Bonanza Peak Renewable Energy Project

Final Initial Study/Addendum

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October 2026

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U Desert Kit Fox and American Badger Management Plan
V Bonanza Peak Energy Project Mitigation Summary

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
AC	alternating current
ACE	Areas of Conservation Emphasis
ACEC	Area of Critical Environmental Concern
ADA	Americans with Disabilities Act
AF	acre feet
AFY	acre feet per year
AHJ	Authority Having Jurisdiction
AJD	Approved Jurisdictional Determination
Amsl	above mean sea level
APLIC	Avian Power Line Interaction Committee
APN	Assessor's Parcel Number
ARD	aquatic resource delineation
ARDR	aquatic resources delineation report
ASTM	American Society for Testing and Materials
Basin	Great Basin Valley Air Basin
BBCS	bird and bat conservation strategy
Bgs	below ground surface
BIOS	Biographic Information and Observation System
BLM	Bureau of Land Management
BMP	best management practices
BODR	Basis of Design Report
BRTR	Biological Resources Technical Report
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGEM	California Geologic Energy Management Division
Cal-IPC	California Invasive Plant Council
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulation
CDFA	California Department of Food and Agriculture
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CH_4	methane

ACRONYMS AND ABBREVIATIONS (cont.)

CHL	California Heritage List
CHP	California Highway Patrol
CHRIS	California Historical Resources Information
CLUP	Comprehensive Land Use and Planning
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	Inyo County
CRA	Cultural Resources Assessment
CREC	Controlled REC
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CWA	Clean Water Act
dB	decibels
DC	direct current
DOC	California Department of Conservation
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DRECP	Desert Renewable Energy Conservation Plan
DTSC	Department of Toxic Substances Control
DWMA	Desert Wildlife Management Area
DWR	California Department of Water Resources
EHSD	Environmental Health Services Department
EIR	Environmental Impact Report
EO	Executive Order
EPC	Engineering, Procurement, and Construction
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Map
FNANM	Flora of North America North of Mexico
FMMP	Farmland Mapping and Monitoring Program
FPD	Fire Protection District
GBUAPCD	Great Basin Unified Air Pollution Control District
Gen-tie	generation tie-in

GHG	greenhouse gas
GNSS	Global Navigation Satellite System
GWP	global warming potential
HA	hydrologic area
HAS	hydrologic subareas
HCP	Habitat Conservation Plan
HELIX	HELIX Environmental Planning, Inc.
HFC	hydrofluorocarbon
HMAP	Hazardous Materials Area Plan
HRA	Health Risk Assessment
HREC	Historical REC
HU	Hydrologic Unit
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
ICC	International Code Council
ICIWMD	Inyo County Waste Integrated Waste Management Department
ICSD	Inyo County Sheriff's Department
IDCEH	Inyo County Department of Environmental Health
In/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
IS/Addendum	Initial Study/Addendum
IS/MND	Initial Study/Mitigated Negative Declaration
ITP	Incidental Take Permit
JEPP	Jeppesen
JESD	Joint Elementary School District
kV	kilovolt
LOS	level-of-service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
MCR	Maximum Incremental Cancer Risk
MCV	Manual of California Vegetation
MDAQMD	Mojave Desert Air Quality Management District
MET	meteorological
MLD	Most Likely Descendant
MMT	million metric tons
Mph	miles per hour
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone

MT	metric tons
MW	megawatt
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NERC	Northern American Electric Reliability Corporation
NESC	National Electrical Safety Code
NO_2	nitrogen dioxide
NO_X	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NPS	National Parks Service
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
NSLU	Noise-sensitive land use
O&M	operation and maintenance
OEHHA	Office of Environmental Health Hazard Assessment
OHV	off-highway vehicle
OPR	Office of Planning and Research
OSR	Open Space and Recreation
OS	Open Space
OVLMP	Owens Valley Land Management Plan
OVSA	Owens Valley Solar Array
PCS	Power Conversion Station
PFC	perfluorocarbons
PM_{10}	coarse particulate matter
$PM_{2.5}$	fine particulate matter
PPV	peak particle velocity
PRA	Paleontological Resources Assessment
PRC	Public Resources Code
PV	Photovoltaic
REAT	Renewable Energy Action Team
REC	recognized environmental conditions
REDA	Renewable Energy Development Agreement
REGPA	Renewable Energy General Plan Amendment
REP	Renewable Energy Permit
ROG	reactive organic gases
ROW	rights-of-way
RPS	Renewable Portfolio Standard
RWQCB	Regional Water Quality Control Board

ACRONYMS AND ABBREVIATIONS(cont.)

SB	Senate Bill
SCADA	Supervisory Control and Data Acquisition
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SEDA	Solar Energy Development Area
Sf	square foot
SF_6	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Officer
SLCP	short-lived climate pollutant
SLF	Sacred Lands File
SO_2	sulfur dioxide
SPCC	Spill Prevention, Control, and Countermeasure
SR	State Route
SRA	State Responsibility Area
SSJVIC	Southern San Joaquin Valley Information Center
SWPPP	Stormwater Pollution Prevention Plan
TAC	Toxic Air Contaminant
THPO	Tribal Historic Preservation Officer
Tpy	tons per year
UPS	uninterruptible power supplies
USACE	United States Army Corps of Engineers
USD	Unified School District
USEPA	United States Environmental Protection Agency
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UTM	Universal Transverse Mercator
VdB	vibration decibels
VFHSZ	Very Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WEAP	Worker Environmental Awareness Program

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INITIAL STUDY INFORMATION SHEET

1.	Project title:	Bonanza Peak Renewable Energy Project
2.	Lead agency name and address:	Inyo County – Planning Department 168 North Edwards Street Independence, CA 93526
3.	Contact person and phone number:	Cathreen Richards, Planning Director (760) 878-0447 crichards@inyocounty.us
4.	Project location:	Charleston View Solar Energy Development Area, Southeastern Inyo County, north of Old Spanish Trail Highway, on the California-Nevada border
5.	General plan designation:	Open Space and Recreation (OSR)
6.	Zoning:	Open Space – 40 acres minimum (OS-40)

7. Description of project:

The proposed Bonanza Peak Renewable Energy Project (project or proposed project) would include construction, operation, and maintenance of an estimated 2,400-acre utility scale solar photovoltaic (PV) energy generating facility in the Charleston View Solar Energy Development Area (SEDA) in southeastern Inyo County, California. Components of the proposed project would include the main solar energy generation area where the solar arrays would be located, power conversion systems including inverters and medium voltage transformers, a medium voltage underground electrical collection system from the Power Conversion Station (PCS) to the main power transformer at the substation facility, a high voltage substation, construction of approximately 0.42-mile of the total 8.89-mile-long 230 kilovolt (kV) generation tie-in line, operation and maintenance (O&M) facilities, power plant control and monitoring system and communications networks, site security and fencing, and perimeter and access roads. When fully operational, the proposed project would have the capacity to convert solar energy up to 500 megawatts (MW) of electricity. The proposed project is anticipated to be developed in two regions within an estimated 18-month construction period.

8. Surrounding land uses and setting:

The project site is located on private land in the southern portion of Pahrump Valley in Inyo County, California. The project site is predominately flat, arid, and sparsely vegetated with elevations that range from approximately 2,560 feet to 2,660 feet above mean sea level (amsl). The project site includes existing dirt roads and sporadic, abandoned buildings.

The project site is surrounded by open space in all directions. Tecopa Road/Old Spanish Trail Highway , is located approximately 0.25-mile south of the project site. The closest localities or towns to the project site include Charleston View, California approximately 1.0-mile to the south; Pahrump, Nevada approximately 25-miles to the north; and Mountain Springs, Nevada approximately 25-miles to the east. The nearest large city to the project site is Las Vegas, Nevada approximately 57-miles to the east.

9. Other public agencies whose approval may be required (e.g., permits or participation agreement):

- California Department of Fish and Wildlife (CDFW)
- Lahontan Regional Water Quality Control Board (RWQCB)
- United States Army Corps of Engineers (USACE)
- United States Fish and Wildlife Service (USFWS)
- Great Basin Unified Air Pollution Control District (GBUAPCD)
- State Historic Preservation Officer (SHPO)

10. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The County carried out tribal consultation under the California Environmental Quality Act (CEQA) for the proposed project (formerly referred to as Assembly Bill (AB) 52). Formal invitations to consult under CEQA were sent by the County to the following tribal representatives on August 27, 2024:

- Cheyenne Stone, Chairperson, Big Pine Paiute Tribe of the Owens Valley
- Danelle Guiterrez, Tribal Historic Preservation Officer (THPO), Big Pine Paiute Tribe of the Owens Valley
- Sally Manning, Environmental Coordinator, Big Pine Paiute of the Owens Valley
- Tribal Administrator, Big Pine Paiute Tribe of the Owens Valley
- Jeff Romero, Vice Chairperson, Bishop Paiute Tribe
- Gloriana M. Bailey, Tribal Administrator, Bishop Paiute Tribe
- Meryl L. Picard, Chairperson, Bishop Paiute Tribe
- Tribal Historic Preservation Officer, Bishop Paiute Tribe
- Jacquelyn Barnum, Environmental Director, Cabazon Band of the Mission Indians
- Carl Dahlberg, Chairperson, Fort Independence Indian Community of Paiutes
- Doug Todd Welmas, Fort Independence Indian Community of Paiutes
- Robert Robinson, THPO, Kern Valley Indian Community
- Janet Hansen, Chairperson, Lone Pine Paiute-Shoshone Tribe
- Bill Eddy, Vice Chairperson, Timbisha Shoshone Tribe
- George Gholson, Chairperson, Timbisha Shoshone Tribe
- Michael Mirelez, Cultural Resource Coordinator, Torez Martinez Desert Cahuila Indians
- Darrell Mike, Tribal Chairperson Twenty-Nine Palms Band of Mission Indians
- Anthony Madrigal, Jr., Tribal Grants Administrator, Twenty-Nine Palms Band of Mission Indians

Each tribal representative was provided with a brief description of the project and its location, the contact information for the County's authorized representative, and a notification that the tribe had 30 days to request consultation. On January 17, 2025, County staff received a letter from the Twenty-Nine Palms Band of Mission Indians initiating consultation between the Tribe and the County.

Inyo County staff have since made four attempts to coordinate with the Twenty-Nine Palms Band of Mission Indians' regarding their consultation request and have not received a response in return. No other tribes requested consultation. The County considers tribal consultation to be complete.

1.0 INTRODUCTION

1.1 Initial Study/Addendum

Inyo County has prepared this Initial Study/Addendum per the requirements of the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code [PRC] Section 21000, et seq.), and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000, et seq.). Inyo County (County) certified a Program Environmental Impact Report (PEIR) for the Renewable Energy General Plan Amendment (REGPA) in March 2015 (State Clearinghouse [SCH] No. 2014061039). This Initial Study/Addendum (IS/Addendum) addresses whether the proposed Bonanza Peak Renewable Energy Project (project or proposed project) may cause significant effects on the environment beyond what was analyzed in the REGPA PEIR. Consistent with PRC Section 20183.3 and CEQA Guidelines Section 15152 and 15162, this IS/Addendum focuses on any effects on the environment that are specific to the proposed project, or to the parcels on which the project would be located, which were not analyzed as potentially significant effects in the previously certified EIR, or for which substantial new information shows that identified efforts would be more significant than described in the EIR.

This IS/Addendum relies on CEQA Guidelines environmental review procedures that allow for the tiering off of a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs or negative declarations on narrower projects. The following subsections of Section 15152 of the CEQA Guidelines state the following with respect to tiering from a certified EIR:

a) “Tiering” refers to using the analysis of general matters contained in a broader EIR with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on issues specific to the later project.

b) Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program or lesser scope, or to a site-specific EIR or negative declaration.

e) Tiering under this section shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.

f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.

    1) Where the lead agency determines that a cumulative effect has been adequately addressed in the prior EIR, that effect is not treated as significant for the purposes of the later EIR or negative declaration, and need not be discussed in detail.

    2) When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and future projects.

3) Significant environmental effects have been adequately addressed if the lead agency determines that:

    A) They have been mitigated or avoided as result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or

    B) They have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

g) When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR and state where a copy of the prior EIR may be examined. The later EIR or negative declaration should state that the lead agency is using the tiering concept and that it is being tiered with the earlier EIR.

The CEQA Guidelines Sections 15162 and 15164 require either the Lead Agency or a Responsible Agency to prepare an Addendum to a certified Initial Study/Mitigated Negative Declaration (IS/MND) or EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 of the CEQA Guidelines calling for preparation of a subsequent environmental document have occurred (refer to the discussion below regarding criteria described in Section 15162). The purpose of this IS/Addendum is to document that no new significant impacts, nor a substantial increase in the severity of previously identified significant impacts, would result from the proposed project as described in this IS/Addendum, relative to what was previously analyzed in the REGPA PEIR.

Sections 15162 and 15164 of the CEQA Guidelines state that an Addendum to a previously certified EIR may be prepared for a project if the criteria summarized below are satisfied:

- **No Substantial Project Changes**. There are no substantial changes proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

- **No Substantial Change in Circumstances**. No substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

- **No New Information of Substantial Importance**. There is no new information of substantial importance, which was not known or could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, which shows any of the following: the project will have one or more significant effects not discussed in the previous EIR; significant effects previously examined will be substantially more severe than shown in the previous EIR; mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or mitigation measures or alternatives which are considerably different from those analyzed in the EIR would

substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

None of the circumstances listed in CEQA Guidelines Section 15152 requiring the preparation of a subsequent EIR are present, and the proposed project is consistent with the general plan and zoning of the County; therefore, an Initial Study tiering off of the REGPA PEIR may be prepared. Furthermore, the County as the Lead Agency under CEQA has determined that the proposed project does not trigger the need for supplemental or subsequent review under Section 15162 of CEQA Guidelines. Therefore, an Addendum was prepared pursuant to Section 15164 of the CEQA Guidelines.

CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects. This IS/Addendum is a public document that assesses the environmental effects of the proposed project. An IS/Addendum need not be circulated for public review but can be included in or attached to the adopted EIR. The decision-making body shall consider the IS/Addendum with the adopted EIR prior to making a decision on the project. The document has been prepared as required by CEQA and in compliance with the CEQA Guidelines (14 California Administrative Code 1400 et seq.).

1.2 Purpose and Document Organization

The purpose of this IS/Addendum is to evaluate whether the project may cause significant effects on the environment beyond what was analyzed in the REGPA PEIR. This document is divided into the following sections:

1.0 Introduction – This section provides an introduction and describes the purpose and organization of the document.

2.0 Project Background – This section provides information on the REGPA PEIR, and project-specific technical studies prepared and incorporated into the analysis included in this IS/Addendum.

3.0 Project Location and Setting – This section provides information on the existing physical conditions of the project site, as well as a brief description of the existing use.

4.0 Project Description – This section discusses the proposed project in detail.

5.0 Environmental Checklist – This section provides a description of the environmental setting and impact analysis for each of the environmental subject areas. Project impact analysis is provided in response to subject-specific questions for each environmental subject area analyzed in the REGPA PEIR, and an impact determination is made for each question. Impact determinations may be “no new impact,” “less than significant impact,” “less than significant impact with mitigation incorporated,” or “new significant impact” in response to the questions included in the environmental checklist for each environmental subject area.

6.0 References – This section identifies documents, websites, people, and other sources consulted during the preparation of this IS/Addendum.

7.0 Initial Study Preparers – This section identifies who worked on this IS/Addendum.

2.0 PROJECT BACKGROUND

2.1 Inyo County Renewable Energy General Plan Amendment

The Inyo County REGPA is intended to facilitate the development of renewable energy facilities within the County, and identified new and modified general plan goals, policies, and implementation measures to include policies for solar energy development within the County. The overall purpose of the REGPA is to regulate and direct the type, siting, and size of potential future renewable energy development within the County and meet the broader goals and visions as expressed in the Inyo County General Plan. The REGPA also included provisions for actual sites identified in the County that may be appropriate for renewable energy development and identified them as Solar Energy Development Areas (SEDA). The REGPA defines a "renewable energy solar facility" as: "any electric transmission line or photovoltaic (PV) power plant to be constructed in Inyo County. A renewable energy solar facility does not include small scale renewable energy solar facilities or a pilot or proof of a concept power plant" (County 2015). The REGPA goes on to define a "utility scale renewable energy facility (more than 20 megawatts [MW])" as: "A renewable energy solar facility that produces more than 20 MW of electricity for offsite use, consumption and/or sale, including all equipment and accessory structures related to the facility, including but not limited to PV panels, mounting posts, substations, electrical infrastructure, transmission lines, operations and maintenance buildings, appurtenant energy storage facilities and other accessory structures."

A PEIR for the REGPA was certified by the County (SCH No. 2014061039) in March 2015. The PEIR found that implementation of the General Plan would have significant and unavoidable impacts to Aesthetics, Biological Resources, and Cultural Resources, and less than significant impacts to agriculture and forestry resources, air quality, geology and soils, greenhouse gas (GHG) emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, socioeconomics, transportation and circulation, and utilities and service systems.

2.2 Charleston View Solar Energy Development Area

The Charleston View SEDA is included in the Eastern Solar Energy Group of the Inyo County REGPA, with a total allowable developable area of approximately 2,400-acres and a total allowable capacity of 500 MW. After adoption of the REGPA, the Inyo County Board of Supervisors directed staff to prepare a Community Plan for Charleston View which included a discussion of the SEDA.

The proposed project would be located within the Charleston View SEDA and meets both definitions of "renewable energy solar facility" and "utility scale renewable energy facility" introduced above. While the transmission line associated with the proposed project could be constructed outside the SEDA, it would be consistent with the Inyo County REGPA Land Use Policy LU-1.17 allowing appurtenant transmission, storage facilities, or related infrastructure to be constructed and operated within any land use designation and any zoning district. Thus, the proposed project would be consistent with and within the scope of the REGPA.

2.3 Project-Specific Technical Studies

The following project specific technical reports, assessments, and/or surveys were prepared or conducted to support the impact analysis included in this IS/Addendum and are incorporated by reference:

- Basis of Design Report, prepared by Stantec Consulting Services Inc. (Stantec), October 2026
- Preliminary Reclamation Plan, prepared by Stantec, September 2026
- Visual Simulations, prepared by ERM on behalf of Bonanza Peak Solar LLC (project applicant), February 2025
- Hidden Hills Airport Email Confirmation, prepared by the project applicant, August 2025
- Glare Analysis Memorandum, prepared by ERM, November 2025
- Air Quality and Greenhouse Gas Emissions Report, prepared by ERM, March 2026
- Biological Resources Technical Report, prepared by Stantec, November 2025
- Non-Confidential Cultural Resources Assessment, prepared by ERM, August 2025
- Paleontological Resources Assessment, prepared by ERM, November 2025
- Geotechnical Report, prepared by Matt MacDonald, March 2021
- Phase I Environmental Site Assessment, prepared by Ninyo & Moore, April 2024
- Wildfire Safety Investigations Memorandum, prepared by ERM, February 2026
- Hydrology and Water Quality Assessment, prepared by ERM, April 2026
- Water Supply Assessment, prepared by ERM, April 2026
- Drainage Report, prepared by Stantec, February 2026
- Transportation Analysis, prepared by Kittelson & Associates, Inc., March 2026
- LeConte's Thrasher CEQA Impact Analysis Memorandum, prepared by ERM, August 2026
- Approved Jurisdictional Delineation, August 2026
- Raven Management Plan, prepared by ERM, August 2026
- Habitat Restoration, Revegetation, and Weed Management Plan, prepared by ERM, September 2026
- Desert Kit Fox and American Badger Management Plan, prepared by ERM, September 2026
- Bonanza Peak Energy Project Mitigation Summary, prepared by ERM, October 2026

3.0 PROJECT LOCATION AND SETTING

3.1 Project Location and Surrounding Uses

The proposed project would be located in the Charleston View SEDA in southeastern Inyo County, California. Charleston View itself is largely undeveloped, except for a grid of unimproved dirt roads dividing it into quarter sections. The project site is comprised of portions of 126 Assessor's Parcel Numbers (APNs): 048-600-01 through -05, 048-610-01 through -13, 048-110-02, -048-620-01 through -16, 048-640-01 through -16, 048-660-01 through -05, 048-630-01 through -16, 048-650-01 through -16, 048-670-01 through -13, 048-120-10, 048-700-01 through -12, and 048-680-01 through -12. Within the estimated total 3,387-acre project area, the project site (or developed area) would encompass 2,400-acres of the total project area.

An 8.89-mile-long 230 kilovolt (kV) generation tie-in (gen-tie) line would be constructed from the proposed substation to land managed by the Bureau of Land Management (BLM) in Nye and Clark Counties, Nevada. Approximately 0.42-mile of the gen-tie line would be in Inyo County, and the

remaining 8.47-miles would be in Nevada. This IS/Addendum covers the 0.42-mile of the total 8.89-mile-long 230 kV gen-tie line from the proposed substation to the California/Nevada border, only addressing the California portion of the project.

The project site is surrounded by open space in all directions. The project site is adjacent to the California – Nevada state line and the Old Spanish Trail Highway/ Tecopa Road, is located approximately 0.25-mile south of the project site. A small amount of commercial and residential zoning is present directly south of the project area in Charleston View, and an existing solar facility (Yellow Pine Energy Center) is located east of the project area in Nevada at the proposed transmission tie-in location. The closest localities or towns to the project site include Charleston View, California approximately 1.0-mile to the south; Pahrump, Nevada approximately 25-miles to the north; and Mountain Springs, Nevada approximately 25-miles to the east. The nearest large city to the project site is Las Vegas, Nevada approximately 57-miles to the east.

The solar facility would occupy portions of Sections 8, 9, 15, 16, 17, 20, 21, 22, 23, 26, 27, and 28 of Township 22 North, Range 10 East, while the gen-tie line would be located on portions of Sections 2, 3, 10, 15, 16, 20, 21, 29, 31, and 32 of Township 22 North, Range 55 East and Sections 35 and 36 of Township 22 North Range 54 East. The project site is located within the Calvada Springs and Mount Spring Meridian, CA USGS 7.5-minute quadrangles. Please see Figure 1-1, Vicinity Map, in the Basis of Design Report (Appendix A).

3.2 Existing Setting

The project site is located on private land in the southern portion of Pahrump Valley in Inyo County, California. The project site is predominately flat, arid, and sparsely vegetated with elevations that range from approximately 2,560 feet to 2,660 feet above mean sea level (amsl). The project site includes existing dirt roads and abandoned buildings. The project location was selected based on a number of factors including its frequent clear sky conditions, very high solar resource availability, and access to the bulk electricity transmission system.

The project site is currently designated by the County as Open Space and Recreation and is zoned by the County as Open Space greater than 40-acres in size (OS-40). The OS-40 zoning designation provides sites for open space and compatible uses. Commercial renewable energy facilities are an allowable use within the OS-40 land use zoning district if also located in a General Plan Solar Energy Development Area overlay.

4.0 PROJECT DESCRIPTION

4.1 Project Objectives from the REGPA PEIR

The seven specific objectives from the Inyo County General Plan that were identified as applying to the REGPA PEIR and thus to the proposed project are as follows:

- Provide for solar development opportunities in Inyo County to generate electricity from solar resources in accordance with the goals established by California State legislation and local policies regarding renewable energy;

- Focus future solar energy development projects to designated development areas that have been selected through an analysis of geographic, physical, political, cultural, environmental, and socioeconomic opportunities and constraints;
- Minimize direct and indirect impact from future solar energy development on the physical, biological, cultural, political, and socioeconomic environments;
- Collaborate effectively with other public resource agencies, tribal governments, nongovernmental organizations, and citizens/residents of Inyo County, and to utilize best available scientific information to aid impact assessment of future solar energy development;
- Locate future solar development near existing electrical conveyance facilities;
- Identify the total allowable capacity and developable acreages per solar energy group and SEDA; and,
- Provide for small scale, community scale, and/or distributed generation solar energy production opportunities throughout the County.

4.2 Project Purpose

The purpose of the project is to provide solar-generated electricity from a site in Inyo County to meet the region's existing and future electricity needs while providing a reliable, economical, and non-polluting, domestic, renewable energy resource in the region. The project would help serve the increase in demand for clean, de-carbonized energy, in a manner that is consistent with federal and California policy mandates and incentives for development of new renewable energy resources, while avoiding and minimizing potential adverse impacts to the environment.

In addition to providing a new source of clean energy, the project pursuant to the REGPA PEIR must provide local community benefits. This could take many forms that could include land and financial support for a new Southern Inyo Fire Protection District (FPD) in Charleston View and financial support for an EIR to evaluate the Draft Community Plan for Charleston View. During the operation and maintenance (O&M) period, the project would employ a small workforce. Local qualified people would be given the opportunity for these jobs.

4.3 Project Features

The proposed project would include construction, operation, and maintenance of an estimated 2,400-acre utility scale solar PV energy generating facility. Components of the proposed project would include the main solar energy generation area where the solar arrays would be located, power conversion systems including inverters and medium voltage transformers, a medium voltage underground electrical collection system from the Power Conversion Stations (PCS) to the main power transformer at the substation facility, a high voltage substation, 0.42-mile of the total 8.89-mile-long 230 kV gen-tie line, O&M facilities, power plant control and monitoring system and communications networks, site security and fencing, and perimeter and access roads. The project components are described in more detail below and are included in the project-specific basis of design report (BODR), included as Appendix A to this IS/Addendum. The proposed site plan is included as Figure 1 to this IS/Addendum.

Site Plan

Photovoltaic Modules and Arrays

The solar facility would utilize bifacial solar PV modules, with a sufficient quantity being installed for a total planned net generating capacity of 500 MW acres. The PV modules would be mounted onto corrosion resistant metal tracking structures which are anchored into the ground via steel posts of standard industry shapes and design. Posts would be driven to the depth required by structural loads and geotechnical conditions, using a vibratory ram or other specialized equipment. The PV modules are arranged in rows to form solar arrays. The array layout would be arranged in a linear pattern as allowed by shading, topography, and other environmental constraints and would be interconnected via underground cabling to electrical inverters located within the solar array field.

The tracking system, including the trackers and actuators, would maintain the PV modules angle toward the sun. These devices change the orientation of the arrays throughout the day to follow the sun's path to maximize energy production. The solar trackers would rotate on one axis moving from east to west each day and returning to a stow position each night. In case of high winds, the control system automatically moves the modules to the stow position to minimize wind loads on the racking and support system. The solar trackers would be powered by motors and would be directed by an actuator that responds to the sun's direction. The use of solar trackers would increase electricity production by between 15-20 percent as compared with modules at a fixed angle.

Power Conversion Stations

PCS would include inverters, step-up transformers, and ancillary electrical protection and control equipment. The PV arrays would be connected to PCS, which would convert direct current (DC) energy produced by the PV modules to medium voltage alternating current (AC) electricity, typically 34.5 kV. PCS would be prefabricated off-site on metal or concrete skids (platforms), along with the associated electrical panels, enclosures, and other equipment necessary for correct operation.

Each PCS would transform the power generated by each inverter unit to medium voltage that is compatible with main power transformer voltage input. Transformers may be dry type, or liquid dielectric, PCB-free (polychlorinated biphenyl). The dielectric fluid would be either natural ester (derived from renewable vegetable oils), synthetic ester, or mineral oil. These fluids are generally accepted as nonhazardous to the environment and would not require secondary containment. Each PCS would be connected via electrical switchgear to an electrical connection system, which would deliver the energy to combining switchgear. The collection system would be installed in accordance with the National Electrical Safety Code (NESC), with underground cables running in underground trenches. Fiber optic communications networks would also run underground, generally in the same trenches as the electrical collection system.

Electrical Substation

The proposed project would step up the collection system voltage to the interconnection system voltage through a project substation. Substation equipment would include main power transformers, circuit breakers, metal-enclosed or open-air switchgear, disconnect switches, safety grounding and lightning protection system, and a transition structure to the overhead gen-tie that would connect to the Trout Canyon substation and associated transmission line. Substation structures would be approximately 150 to 170 feet or higher per NESC requirements for system voltages of 35 to 500 kV and local authority

requirements. Project substation would be fenced and secured in accordance with North American Electric Reliability Corporation (NERC), NESC, and Authority Having Jurisdiction (AHJ) requirements.

Gen-Tie Line and Electrical Collection Lines

The power produced by the project would be generated by the PV modules and collected within the PV arrays via medium voltage (34.5 kV) collection lines. The medium voltage connection lines will carry the generated electricity to the project substation using a typical overhead or underground cable arrangement at 34.5 kV voltage level.

At the project substation, this power would then be converted to high voltage (230 kV). The power would be carried between the project substation and the Trout Canyon substation, located approximately nine miles to the northeast via an 8.89-mile-long 230 kV high voltage overhead gen-tie line. As outlined in Section 3.1, this IS/Addendum will cover 0.42-mile of the total 8.89-mile-long 230 kV gen-tie line from the proposed substation to the California/Nevada border, only addressing the California portion of the project.

The high voltage gen-tie transmission line layout and configuration would be designed to accommodate constraints associated with utility easements and any other existing easements. The transmission line would consist of support pole structures, electrical power conductors, fiber optic communication lines and a lightening protection wire above. The overhead transmission pole structures would be approximately 150-to 170-feet-tall, depending on terrain and rights-of-way (ROW) configuration. Pole foundations would be up to 35-feet-deep. The gen-tie lines and structural design for the proposed project would adhere to Federal Aviation Administration (FAA), International Civil Aviation Organization, and Avian Power Line Interaction Committee (APLIC) guidelines to avoid avian electrocutions and minimize collision potential.

Operation and Maintenance Building

The project would include an estimated 2,000 square foot (sf), prefabricated O&M building. The O&M building would include permanent plumbing and sanitation facilities for use by the staff, and would include heating, ventilation, and air conditioning (HVAC) services to provide a conditioned environment for the safety and health of O&M personnel. The Supervisory Control and Data Acquisition (SCADA) system may be installed within the O&M building.

The O&M building would be constructed near the main entrance to the project site and would include up to 12 unpaved parking spaces including Americans with Disabilities Act (ADA) spaces for staff vehicles, delivery trucks, and service vehicles adjacent to the building.

Shipping Container Storage

Up to twelve, 40-foot-long shipping containers would be installed for solar and electrical spare parts storage and would be fitted with racking as well as interior and exterior lighting. Storage containers would be installed on sleepers on compacted native earth or on a gravel base for drainage and accessibility.

Site Access and Service Roads

Construction Site Access

Primary construction traffic to the project would originate from Nevada Route 160 to Tecopa Road/Old Spanish Trail Highway, then turn north onto Zircon Street for approximately 0.25-mile before entering the project site. This portion of Zircon Street for construction access requires 26-foot-wide travel with 2-foot-wide shoulders and a gravel road base to a depth as required by the Fire Code Standards and Geotechnical Report (Appendix J) recommendations. Existing public roads would remain open to the public during construction.

Operational Site Access

Operational period traffic would also utilize Nevada Route 160 and Tecopa Road, but during operations, one of two potential access points would be used: one would be off of Tecopa Road and Gold Street or the other would be off of Tecopa Road and Zircon Street.

Service Roads

New service roads would be constructed within the project site along electrical collector line corridors to support project construction and operation. The number and length of roads would be minimized to the extent possible to reduce surface disturbance. Such maintenance roads would have a permanent travel width of 16-feet and 2-foot shoulders with a gravel road base to a depth as required by the Fire Code Standards and Geotechnical Report recommendations. The service roads would have an approximately 25-foot radius at road centerline and would have an approximately 35-foot radius at minimum or as dictated by the Fire Code Standards at road corners. The design speed for these roads would be approximately 15 miles per hour (mph). Water would be applied by tanker truck to all project roads up to six times per workday to control fugitive dust. These service roads would be used during construction to facilitate delivery of components, installation, and wiring, and for scheduled and unscheduled maintenance access during operations. All public roads outside of the solar facility would remain publicly accessible, but fencing would be placed along the public roads to prevent unauthorized access to the facility.

Perimeter Fencing and Security

Construction Fencing

A 6- to 7-foot-high security perimeter fence topped with 1-foot of barbed wire would be installed around the arrays and along the public roads through the project site. New fence lines would be established at the edges of the project. There would be lockable double swinging security gates constructed at these locations, but with access provided to emergency service providers. The facility fences and gates would be marked with the emergency contact information in accordance with Federal, State, and local emergency providers' requirements.

Per the U.S. Fish and Wildlife Service (USFWS) General Conservation Plan for the Desert Tortoise of California, during construction, the project would follow the USFWS's most recent protocol for construction of fencing and gates to exclude desert tortoises. The specifications of the perimeter fencing

and gates would be designed under consultation from the USFWS and the California Department of Fish and Wildlife (CDFW).

Operational Fencing

The facility requires security during the operations phase. A permanent fence would be installed around the project site. The typical fence profile is 6- to 7-foot of 2-inch cyclone mesh, with two to three strands of barbed wire above the cyclone. The finished fence is standard for most electrical installations and is required by National Electric and National Safety Codes to prevent unauthorized personnel from gaining access to energized components. Per the USFWS General Conservation Plan for the Desert Tortoise of California, during construction, the Project would follow the USFWS's most recent protocol for construction of fencing and gates to exclude desert tortoises. The specifications of the perimeter fencing and gates would be designed under consultation from the USFWS and CDFW. The project also would be marked with warning and no trespassing signage on fences, gates, and electrical equipment. All gates, access doors, and ports would be locked at all times.

Signage

Signage for safety and identification would be posted around the perimeter of the project site, and safety signage at the electrical equipment. During construction and decommissioning, temporary directional signage would be installed, as needed. No large billboards or other forms of advertising signage are proposed, and any existing signage would remain.

Water Supply

Water for construction and operation would be sourced from one or more existing private groundwater wells within the project applicant's lease. Water rights adequate to support the annual water requirements for construction and operation are within the land lease held by the project applicant. The identification of project water supply wells will be determined upon well testing. All project water supply wells will be reviewed and approved by the Inyo County Environmental Health Department and all appropriate permits would be obtained.

Stormwater Control Basins

Approximately 21 unlined sediment (stormwater) control basins totaling approximately 20 acres would be graded and cleared along the project boundaries outside of the project fence to capture stormwater and sediment leaving the site. These features would be approximately 2 feet deep, range in dimensions up to 95 feet by 670 feet, and would be allowed to revegetate.

Grading would require that affected areas are reseeded after construction is complete, if not covered by gravel roads or equipment foundations. Regrading and revegetation techniques from short-term and permanent disturbance would be provided in a Stormwater Pollution Prevention Plan (SWPPP).

Temporary access to the construction areas would occur by driving over existing vegetation and creating temporary access routes over crushed vegetation; no clearing and grading would be required. This construction method would minimize disturbance of soils and vegetation.

Septic System and Leach Field

A permitted septic system and/or tile field (if permitted) would be installed for wastewater treatment and disposal.

Power Service and Generator

A commercial power service and meter would be sourced from and installed by APS Electric Company to provide power to the switchgear and O&M building. If a commercial power service is not available, then the project may utilize a 175 kW generator for the construction trailers and the well pumps.

Lighting

Site lighting will comply with Inyo County's Outdoor Lighting Ordinance (Title 18.79). The O&M facility and substation would have motion-activated, downward pointing/full cutoff nighttime lighting (designed to limit upward light pollution or across project boundaries) to minimize effects on dark night skies. The lights within the O&M facility would be installed on the exterior of the O&M building and the storage shipping containers. This lighting may also be placed at gates or other locations to provide additional security. Electricity for the lighting would be provided by the local utility via a commercial meter.

SCADA System and Fiber Optic Communications

Measurement, monitoring, safety, and control of the electrical operation would be conducted by a plan SCADA system. This system consists of measurement devices, weather monitoring, industrial computers, network communications, and equipment interfaces. The SCADA system would collect operating and performance data from the project and allow remote monitoring of facility operation and/or remote control of critical components. The PV modules, PCSs, and meteorological (MET) stations would be linked to a central computer in the O&M facility building, or in a separate freestanding insulated and conditioned enclosure. The SCADA system would also be linked to the remote operations center by a fiber optic network (on-site) and cellular, telephone, microwave, or satellite communications (off-site) via a lattice microwave tower located near the O&M building. The SCADA system would interface with the local utility grid operations to allow the utility to monitor plant operations and to disable project output in case of safety or grid-operation requirements. The fiber optic cables required for the SCADA system would be buried with the electrical distribution system in a trench carrying the electrical connection lines to the O&M building.

Meteorological Stations

MET stations would be installed at the project site at various locations. The MET stations instruments are typically mounted on an approximately 10- to 15-foot high tubular steel tower with guy wires, and a small concrete foundation. The MET stations would be located in the interior of the PV arrays to accurately measure conditions within the solar arrays and connected to the SCADA system to collect data for analysis and system monitoring.

4.4 Construction

Construction of the solar facility would commence as early as January 2027. The proposed project will occur over two regions within an approximately 18-month construction period. Construction equipment

would operate between the hours of 7:00 a.m. and 6:00 p.m., Monday through Friday, unless project schedule demands require a temporary extension of those hours.

Preconstruction Activities

Preconstruction activities would include a topographical survey and civil survey to delineate the following: PV modules array boundaries, O&M facility location, access roads, temporary use areas, stormwater features, and the gen-tie line route. Pre-construction wildlife clearance surveys would be conducted within appropriate time windows. Preconstruction surveys include survey crews, utility workers for local station power, supervisors, and engineers. Site preparation and installation of fencing would commence when environmental restrictions are cleared. Workers would be provided with training on potential environmental restrictions and best practices. The project applicant would use qualified local and non-local contractors/subcontractors according to the equipment and personnel needs of the project.

Work Force

Employment during construction may range up to 450 workers depending on construction activities. Workers will commute by private vehicle to the site each workday, most likely from cities and towns in Nevada such as Pahrump, located approximately 25-miles from the project area, and Las Vegas, located approximately 60 miles from the project area, due to availability of housing; camping or staying in recreational vehicles would not be allowed on site or in the local area per Inyo County Code 14.04.040 (Habitation Restrictions). Carpooling to and from the site each workday would be encouraged, which would reduce the number of daily commuter vehicle trips. However, the maximum number of 450 one-way vehicle trips was analyzed. Workers would utilize the construction trailers during the workday for office use and site safety briefings; these trailers would be locked at the end of each workday. Workers would bring their own workday food, or a food truck may be provided. Sanitation facilities for the workers would consist of exterior porta-johns and/or sanitation trailers.

Preconstruction surveys include survey crews, utility workers for local station power, supervisors, and engineers. Site preparation and fencing would commence when environmental restrictions are cleared. Workers would be provided with training on potential environmental restrictions and best practices. The project applicant would use qualified local and non-local contractors/subcontractors according to the equipment and personnel needs of the project.

Equipment

The following equipment, sorted by activity, would be used during project construction:

- Road Construction: Bulldozer, motor grader, drum packer, dump truck/belly dump truck, gannon tractor, water truck, rubber tire backhoe, excavator, scraper
- Electrical Work, Station Construction: Backhoe, bulldozer, cable spool truck, concrete truck, excavator, gannon tractor, water truck, trencher, materials/waste transportation truck, auger rig, forklift to offload spools, bobcat
- Solar Array Assembly and Erection: Fork truck, hydraulic crane, water truck, materials transportation truck, vibratory pile driver

- Project Cleanup: dump truck, front-end loader, dozer, motor grader, materials/waste transportation truck

- Daily Construction Traffic: full-size pickups, gators, buses, FedEx, United Parcel Service, and other delivery trucks

Per the USFWS General Conservation Plan for the Desert Tortoise of California, the project would require that all workers, contractors, and all other participants in the activity check under their vehicles or equipment prior to moving them when they are in areas where desert tortoises are likely to be active.

Transportation

Trucks transporting project components and construction materials would access the project site from Nevada Route 160 to Tecopa Road, Old Spanish Trail Highway and then north on Zircon Street for approximately 0.25-mile before entering the project site road that generally follows near the State line. The project site would include an undeveloped construction parking area for approximately 300 vehicles.

In general, oversized trucks would not be used to transport PV module components to the project site but may be required to deliver the main power transformers. It is not anticipated that any road improvements beyond adding a gravel road base to Zircon Street and the County roads would be needed to accommodate delivery and construction traffic along public roads and highways.

Equipment and material hauling would be performed in a manner to prevent damage to areas outside the project and minimize interference with existing land use activities. Transportation and construction contractors would obtain all necessary permits for transportation-related elements of the project from the California Department of Transportation (Caltrans) and the County. A Traffic Management Plan would be drafted to ensure safety and minimize impacts on traffic flow in the vicinity of the project, as outlined in Section 5.XVII, Transportation and Circulation.

Routine vehicle and equipment maintenance activities would be performed off-site or within the material storage, staging and laydown areas. Broken-down vehicles or equipment would be trucked or towed off-site for repair.

A Habitat Restoration, Revegetation, and Noxious Weed Control Plan would be developed in coordination with environmental permitting agencies, as outlined in Section 5.II, Agriculture and Forestry Services and Section 5.IV, Biological Resources, to minimize potential impacts from the introduction and spread of noxious and invasive weeds due to vehicles entering the construction areas. Best management practices would be employed to reduce the likelihood of the introduction of non-native invasive plant species.

Access and Connector Roads

Construction of the project would require the construction of new roads within electrical collection corridors to provide access for employees and equipment. Access roads would provide permanent vehicle access throughout the construction, O&M, and decommissioning of the project to the arrays, substation, O&M facility, and the MET towers.

The general road design criteria for the perimeter road and roads to facilities would include the following specifications:

- Roads would have gravel road base and a travel width of 16-feet and 2-foot shoulders and be sloped to match existing grades.
- Approximately 25-foot radius at road centerline.
- Approximately 35-foot radius at minimum or as dictated by the Fire Code Standards at road corners.
- Road base with gravel surface, as dictated by the Fire Code Standards or geotechnical report recommendations, which will also serve to reduce fugitive dust.
- Design speed: Approximately 15 miles per hour.

Where access roads would cross existing underground utilities (if identified) the crossing sites would be designed to be protective of the underground utilities. Access road construction would begin with site preparation. The service and maintenance access roads would be scarified and compacted with water bars installed as necessary. Road construction can also start with rough grading and leveling of roadways. Water bars would be cut across roads as needed to allow for natural drainage of water over the road surface and to prevent road washout. Water would be applied by tanker truck to all Project roads up to six times per workday to control fugitive dust.

After construction, all areas exhibiting soil disturbance would be surveyed for the presence of noxious weeds. Noxious weed control would be performed on-site during construction according to the specifications defined in the project's Stormwater Pollution Prevention Plan (SWPPP).

Clearing and Grading

Site preparation of vegetated areas would involve minimal cutting leaving part of the shrub and the root structure intact to minimize soil disturbance and reduce potential impacts to desert tortoise. Details pertaining to vegetation management during construction will be included in a Vegetation Management Plan that would be developed by the project applicant. Minimal grading would occur, primarily at the substation, and O&M building sites, and the interior project roads along electrical collection line corridors. Clearing and grading of these areas (approximately 69-acres of the total 2,400-acre solar facility) would be accomplished using a standard bulldozer, grader, or other similar earthmoving equipment.

Grading would require that affected areas are reseeded after construction is complete, if not covered by gravel roads or equipment foundations. Regrading and revegetation techniques from short-term and permanent disturbance would be provided in a SWPPP.

Temporary access to the construction areas would occur by driving over existing vegetation and creating temporary access routes over crushed vegetation; no clearing and grading would be required. This construction method would minimize disturbance of soils and vegetation.

Temporary Construction Facilities

The project site would have 50-acres of temporary construction facilities, including temporary material storage and staging areas, fueling stations, water storage ponds, temporary construction trailers, and parking areas. All temporary construction facilities are tentative; these locations would be refined throughout the Inyo County permitting and final design process. These construction facilities would be used throughout the construction period and would then be decommissioned in accordance with the project's Reclamation Plan. These temporary construction facilities are described in more detail below.

Temporary Material Storage, Staging, and Laydown Areas

Temporary material storage, staging, and laydown areas would be established within the project site to store components and to facilitate construction activities. The storage, staging, and laydown areas would be used to store office trailers, for parking construction and personal vehicles, storage of construction equipment, and temporary staging and laydown for construction materials. The storage, staging, and laydown areas would be reclaimed following construction.

Temporary Fueling Stations

Fueling stations would be established within the project site to service construction vehicles. Diesel aboveground fuel tanks would be located at the project material storage, staging, and laydown areas for vehicle and equipment fueling. Each fuel tank would be located within a temporary secondary containment berm, would be equipped with a spill kit, and would be operated consistently with the project's Hazardous Materials and Waste Management Plan.

Temporary Water Storage Ponds

It is anticipated that two temporary water storage ponds would be needed during construction. Each construction water storage pond would hold approximately 100,000 gallons, would be lined with a plastic and/or rubber liner, and would have a slight pitch to the corner closest to the transfer pump. Ponds would be filled as necessary from an on-site well according to water demands. Their locations would be identified upon a more detailed project design. Any surface water discharge would be in compliance with water quality and sediment management regulations.

Temporary Construction Trailers

Four to five temporary construction trailers would be provided for construction day use only for office space and for a site safety location. Approximately 500 amps of temporary electrical service would be obtained through a meter installed on a local power line. Sanitation facilities would consist of exterior porta-johns or trailers that contain porta-johns. Approximately 50 people would be using these trailers during construction hours, which would be locked at the end of each workday. Construction employees would bring their own workday food, or a food truck may be provided. Solid waste generated at the trailers would be hauled and disposed of at a permitted facility by a licensed waste removal contractor approved by the County.

Temporary Parking Area

There would be undeveloped construction parking area for trucks and personal vehicles of the construction employees.

Construction Water Needs

Construction of similar, utility-scale PV solar projects on more temperate desert sites (with temperatures below 100 degrees Fahrenheit) spanning up to one (1) square mile have typically entailed the use of approximately 20 water truck fill-ups per day—each carrying 5,000 gallons (approximately 0.015 acre feet [AF])—during summer periods. For such projects, total water uses generally ranged between 0.1 and 0.2 AF per acre annually. The proposed project site, however, is located in a hotter and drier climate and therefore will require additional water. To account for the increased water need, it is conservatively assumed that 0.30 AF would be required for each acre of ground-disturbing activity annually. The proposed project has an estimated construction water demand of 723 AF per year (AFY), based on the 2,400-acre solar facility plus 10-acres associated with the access road and gen-tie corridor in California. Therefore, the 18-month construction period would require a total of 1,085 AF of water.

Postconstruction and Revegetation

The final region of construction is cleanup, and restoration of areas disturbed by construction but not required for facility operations. Areas that have been temporarily disturbed by grading or other earthmoving activities would be restored to the preconstruction contours of the land to the extent possible and consistent with future operating needs. Work may consist of mowing, shrub maintenance, re-contouring areas, establishing vegetation, and applying mulch to provide additional erosion control. Ungraded areas disturbed only by overland travel would be assessed in coordination with Inyo County to determine if restoration is needed for recovery of the area. Temporary disturbance areas would be revegetated using seed mixtures and techniques developed in consultation with Inyo County or CDFW.

Noxious and invasive weed control would continue on-site during the restoration process. Active management after initial seeding would help ensure the success of the revegetation process. Upon completion of construction and restoration, fences and other previously existing structures would be reestablished to as good as condition or better than that existing at the start of site preparation and construction activities.

4.5 Health and Safety

Construction activity, personnel on-site, and worker travel could potentially have impacts on health and safety during the approximately 18-month construction period. However, in general, the project would have minimal impacts on fire, medical, and law enforcement services. During both construction and operation, the plans and procedures described in the following sections would serve to greatly reduce the chances that medical and law enforcement services would be required.

Prior to the start of construction, the project applicant would conduct a safety assessment to identify potential safety issues and to develop measures that would be employed to mitigate them. Potential safety issues include site safety and security, worker on-site and off-site injuries, fire control, safe work practices, heavy equipment transportation, and traffic management. A health and safety program would be developed to protect both workers and the public during project construction, including a Health and Safety Plan with emergency response procedures.

Site Safety and Security

The project would post warning signs along the project access roads from Nevada Route 160 to the site boundary informing the public of construction activities, warning of increased vehicles and potential wide loads on the roads and directing that the public does not enter the site. For areas where public safety risks could exist and site personnel would not be available to control public access (such as excavated foundation holes and electrical distribution system trenches), warning signs and temporary fences or flagging would be erected. Fencing also may be installed around material storage, staging, and laydown areas. Other areas determined to be hazardous or where issues of security or theft are of concern also may be fenced. Temporary fencing around unfinished excavations and other potential hazards typically would consist of a high-visibility plastic mesh or red/yellow danger tape. The project applicant also may use security guards, cameras, and/or additional fencing, if necessary, to protect public health and safety and project facilities. Public safety assistance would be expected to come from the Inyo County Sheriff's Office, Shoshone Substation. Per the County Sheriff's Office, response time from the Shoshone Substation to the project site would be approximately 30-40 minutes.

A site-specific Health and Safety Plan will be provided to all workers and made available electronically and in hard copy on-site. It is generally reviewed and updated at least annually, and all changes are communicated to workers. The purpose of the plan is to provide compliance with federal, State, and local Health and Safety requirements, project and site-specific concerns, and the Engineering, Procurement, and Construction (EPC) corporate Health and Safety guidance. Site safety procedures would address a zero-injury safety policy, responsibilities and roles of personnel, health and safety for subcontractors, worker safety orientation and training, severe weather conditions, and accident/incident reporting procedures. The site safety procedures would also outline employee safe work programs, including drug and alcohol policies, hazardous materials, fire protection, respirator use and maintenance, confined workspaces, and potential work hazards such as blood-borne pathogens, electrical hazards, and environmental dangers.

Emergency Response

An Emergency Response Plan provides information and instructions to guide site managers, workers, and first responders in preparing for, and safely responding to, an incident, fire, or other emergency associated with the solar facility and appurtenant systems. The Emergency Response Plan includes the general hazards and nearby exposures related to construction and operations, as well as detailed information including but limited to the Incident Command System, safety, staging areas, site access, lock box access, and water supply. The EPC contractor must have a qualified health and safety individual at the construction trailer from construction start to completion. This individual must be EMT trained. The construction trailer must contain a first aid kit and a defibrillator.

Emergency response procedures would include emergency recognition and prevention, organization and personnel responsibilities, emergency alerting procedures, maps and diagrams of the facilities, incident documentation, investigation responsibilities, and post-emergency activities. Specific emergency response procedures for medical, severe weather, power outages, and other situations would also be addressed. It is expected that emergency medical responses would typically come from Pahrump, Nevada, located 28-miles (30 minutes) from the project site. Additionally, workers would be trained in access routes and other emergency preparedness, which would assist in reducing impacts related to response times.

Emergency response procedures would be included in a Emergency Response Plan. The project applicant would be responsible for implementing emergency procedures during the course of the project.

Fire Management and Protection Plan

Fire prevention and suppression procedures would be provided in the Emergency Response Plan and would address potential fire sources and appropriate safety and fire prevention measures. Project-specific fire prevention and suppression procedures include vehicle exhaust systems, fueling operations, smoking, electrical work, and on-site flammable liquid storage. Fire suppression, emergency preparedness, and emergency notification and follow-up procedures would be addressed, and other measures such as carrying fire extinguishers and shovels would be incorporated into the procedures. Fire response could come from the Southern Inyo FPD in Tecopa (25-miles/45 minutes) or from Pahrump, Nevada.

Traffic Management Plan

Traffic management and transportation procedures would be included in a Traffic Management Plan. Traffic management procedures would be designed to minimize potential hazards from increased truck traffic and worker traffic and to minimize impacts to traffic flow in the vicinity of the project. The procedures would present project-specific information on traffic and circulation in the project site, truck traffic volumes, traffic situations, areas of congestion, and special traffic concerns such as the location of school bus routes, and specific traffic management measures including informational signs, flaggers when equipment blocks throughways, and traffic cones to identify any temporary changes in lane configuration.

Transportation procedures would address issues specific to transporting project components, as well as construction equipment, including but not limited to trucks, loaders, various-sized bulldozers, shovels and backhoes, welding rigs, generators, and compressors. Equipment and material hauling would be performed in such a manner as to prevent damage to areas outside the Project and to minimize interference with existing uses of lands crossed.

The transportation procedures would describe regional and local access routes and affected roadways, traffic volumes, pavement conditions, and traffic mitigation measures. The procedures would describe travel routes for construction materials, current and predicted traffic volumes for construction access routes, and best management practices (BMP) for handling traffic along these transit routes during project construction. The procedures would also identify the processes for complying with any state requirements.

Grounding

Grounding equipment would be installed at the project substation, PV racking systems, combiner boxes and inverters. Each transformer also would be grounded to protect equipment and personnel. The project substation would include a below grade grounding grid.

4.6 Operation and Maintenance

After construction, the project will enter the operational phase. The solar PV modules at the project site would operate during daylight seven days per week, 365 days per year.

Work Force

Operation of the solar energy facility would require approximately 6 to 10 full-time employees. The operations workforce would include off-site facility managers, administrative support, SCADA instrument and PV module technicians, and other monitoring and maintenance personnel. The majority of the employees would be full-time throughout the anticipated life of the project. During the first several years of project operations (the warranty period), additional personnel employed by the component manufacturer(s) may be on-site conducting equipment performance monitoring and calibration. Seasonal workers would be on-site to support vegetation management as needed.

Operational Activities

Routine maintenance of the PV module arrays would be necessary to optimize performance and to detect potential malfunctions. O&M procedures would be established to define specific routine PV module maintenance and inspection activities based on the PV modules manufacturer's recommendations.

Transformers and inverter units would be maintained as part of normal O&M activities. Periodic inspection and/or maintenance of underground electrical collection lines may be required during the life of the project. These activities would be conducted pursuant to prudent utility practices. Switchgear maintenance activities would include routine, scheduled equipment maintenance, grounds keeping, and emergency maintenance in the event of equipment failure. Switchgear maintenance would be performed by project personnel or approved contractors. Inoperative PV modules would be repaired, replaced, or removed in a timely manner.

Once temporary reclamation is complete and vegetation is stable following construction, noxious weed surveys will continue on an annual basis. Routine maintenance would include weed monitoring and treatment that would be outlined in the SWPPP.

Products used for Monitoring and Maintenance

The project would utilize a meter on a local power line for power during the operational phase. Should the local power source be unavailable, the project may utilize a 20 kW propane generator for service power.

No new raw materials would be routinely required for project operation, once each phase of construction is completed and commercial operation is achieved. Materials brought onto the site after commercial operation is achieved would be limited to those required for O&M, repair or replacement of components, systems or structures necessary for continued safe and reliable operation.

Materials typically used for O&M of the project may include mineral or biodegradable transformer dielectric fluids, natural or synthetic oils as lubricants, cleaning agents, and herbicides for weed control. These materials, some of which may be classed as hazardous, would be stored in small quantities (less

than 50 gallons) securely at the O&M facility. Batteries, for switchgear tripping or uninterruptible power supplies (UPS) for SCADA or computers may include materials classified as hazardous, depending on the specific type of energy storage technology utilized.

Hazardous materials use, storage, and disposal would be in accordance with the project's Hazardous Materials and Waste Management Plan and would comply with applicable local, State, and federal environmental laws and regulations. The plan identifies hazardous materials that would be used, stored, or transported and establishes inspection procedures, storage requirements, storage quantity limits, inventory control, non-hazardous product substitutes, and disposal of excess materials. The plan also identifies requirements for notices to federal and local emergency response authorities and includes emergency preparedness and response plans, including spill response. Accidental releases of hazardous materials would be prevented or minimized through proper containment of these substances during transportation to the site, storage on-site, and use. Hazardous waste would be removed and disposed of off-site in an appropriately permitted disposal facility.

Hazardous substances or hazardous wastes that are oils or mixed with oils are subject to Spill Prevention, Control, and Countermeasure (SPCC) rule requirements and would be managed according to a Project SPCC Plan for Project O&M. The SPCC Plan would be supplemented by other plans, as necessary, describing control and response procedures for other hazardous materials or wastes regulated by the Resource Conservation and Recovery Act and not included in the SPCC Plan.

The project Hazardous Materials and Waste Management Plan would also identify the waste streams expected to be generated at the site and address solid waste determination procedures, waste storage locations, waste-specific management and disposal requirements, inspection procedures, and waste minimization procedures. Disposal of liquid and solid waste produced during operation of the solar energy facility would be done so as not to impact human health and the environment.

Operational Water Needs

Solar panel washing is not anticipated. The main water demand components for the operational phase of the project consist of water use associated with the O&M building. The estimated total annual water use during operations is approximately 0.014 AFY over the life of the project. This water would be obtained from an existing or new well. Drinking water would also be supplied via a five gallon cooler dispenser in the O&M building.

4.7 Decommissioning and Site Reclamation

The project applicant is seeking a 50-year Renewables Energy Development Agreement (REDA) for the project on private land in Inyo County. At the end of the project's useful life, the solar arrays and electrical connection lines would be decommissioned and dismantled, and some components would be recycled or re-used. While it is possible that the project applicant may want to work with the County to repower the site at some point in time, repowering is beyond the scope of this project. Project decommissioning would be completed, including reclamation, in compliance with all applicable federal, State, and local requirements. The project's Preliminary Reclamation Plan provides specific details as to how decommissioning would be accomplished and would be based on a final layout. The Preliminary Reclamation Plan is included as Appendix B to this IS/Addendum.

4.8 Required Permits and Approvals

A list and brief description of the approvals and/or regulatory permits required to implement the proposed project are provided below. This environmental document is intended to address the environmental impacts associated with all the following decision actions and approvals:

Inyo County

- Building Permit
- Grading Permit
- Well Permit
- Septic Permit
- Renewables Energy Development Agreement (REDA)
- Project Approval: Inyo County Board of Supervisors will consider approval of the proposed project.
- Zone Text Amendment addressing setbacks

Other Agencies

- **Great Basin Unified Air Pollution Control District:** Obtain an Authority to Construct and Permit to Operate.
- **California Department of Fish and Wildlife:** Obtain a Fish and Game Code Section 1602 Lake and Streambed Alteration Agreement and Incidental Take Permit (ITP) from CDFW (Region 6, Inland Deserts Region).
- **Lahontan Regional Water Quality Control Board:** Obtain a Clean Water Act (CWA) Section 401 Water Quality Certification and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the Lahontan Regional Water Quality Control Board (Region 6).
- **State Historic Preservation Office:** Conduct Section 106 consultation in accordance with the National Historic Preservation Act, Section 106.
- **U.S. Army Corps of Engineers:** The USACE have verified that waters of the U.S. are absent from the project footprint. Authorization by the USACE to discharge dredged or fill material under Section 404 of the CWA is unwarranted.
- **U.S Fish and Wildlife Service:** Obtain an Endangered Species Act Section 10 Consultation under the General Conservation Plan for the Desert Tortoise of California.

5.0 ENVIRONMENTAL CHECKLIST

The Lead Agency has defined the column headings in the environmental checklist as follows:

A. "New Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "New Significant Impact" entries when the determination is made, an EIR is required.

B. "Less Than Significant with Mitigation Incorporated" applies where the inclusion of mitigation measures has reduced an effect from "New Significant Impact" to a "Less Than Significant Impact." All mitigation measures are described, including a brief explanation of how the measures reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be cross-referenced.

C. "Less Than Significant Impact" applies where the project does not create an impact that exceeds a stated significance threshold.

D. "No New Impact" applies where a project does not create a new impact in that category compared to the determinations made for that category in the REGPA PEIR.

The explanation of each issue identifies the significance criteria or threshold used to evaluate each question; and the mitigation measure identified, if any, to reduce the impact to less than significance. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration [CEQA Guidelines Section 15063(c)(3)(D)]. Where appropriate, the discussion identifies the following:

a) Earlier Analyses Used. Identifies where earlier analyses are available for review.

b) Impacts Adequately Addressed. Identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Incorporated," describes the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

I. AESTHETICS

		New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:					
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	Substantially degrade the existing visual character or quality of public views of the site and its surroundings?	☐	☐	☐	☒
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Visual Simulations of the proposed project were prepared by the project applicant on February 21, 2025, and are incorporated below and included as Appendix C to this IS/Addendum. Email confirmation that Hidden Hills Airport is not an officially recognized airport is incorporated below and included as Appendix D to this IS/Addendum. A Glare Analysis Memorandum was prepared by ERM on November 20, 2025, and is incorporated below and included as Appendix E to this IS/Addendum.

Environmental Setting

Project Area Visual Setting

The proposed project would be located in the Charleston View SEDA in southeastern Inyo County, California. The Charleston View SEDA is located in the in Pahrump Valley in southeastern portion of the County at the California – Nevada border and encompasses approximately is 39,697-acres (62 square miles). The Charleston View SEDA consists of undeveloped land along with a few rural residences in the small community of Charleston View. The St. Theresa Mission includes a church and cemetery with mission style buildings and red roofs that visually contrast with the older buildings and trailers that are scattered throughout the area. The relatively level valley floor provides expansive views across the valley to surrounding mountains ranges and prominent peaks, including the Nopah Range to the west and the Spring Mountains featuring Charleston Peak (at 11,916 feet amsl) in Nevada to the east (County 2015).

The project site is surrounded by open space in all directions. The project site is adjacent to the California – Nevada state line and Tecopa Road/Old Spanish Trail Highway , is located approximately 0.25-mile south of the project site. A small amount of commercial and residential zoning is present directly south of the project area in Charleston View, and an existing solar facility (Yellow Pine Energy Center) is located east of the project area in Nevada at the proposed transmission tie-in location. The closest localities or towns to the project site include Charleston View, California approximately 1-mile to the south; Pahrump, Nevada approximately 25-miles to the north; and Mountain Springs, Nevada

approximately 25-miles to the east. The nearest large city to the project site is Las Vegas, Nevada approximately 57-miles to the east.

The project site is not located near any eligible or designated State scenic highways. The nearest eligible State scenic highway is State Route (SR) 127 located approximately 20-miles west of the project site (Caltrans 2025).

Viewer Groups

Viewer groups who potentially would have views of the proposed project include motorists, recreationalists, and residents. The County contains numerous recreational and destination areas within its vast inventory of natural resources, wilderness areas, historic places, and forest land. Death Valley National Park, Mount Whitney, and the eastern Sierras are probably the most notable of these recreational resources, but there are numerous hiking/biking trails that are well-traveled, several lakes and rivers, and other recreational features (e.g., sand dunes, campgrounds, and off-highway vehicle [OHV] parks) that provide recreation for County visitors and residents. Users of these recreational resources comprise a large viewer group.

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.1, *Aesthetics*, of the REGPA PEIR, while implementation of Mitigation Measures AES-1 through AES-10 may reduce visual impacts for future utility scale, commercial scale, and community scale solar energy projects, impacts would remain significant and unavoidable.

Discussion of Project Impacts

a) Would the project have a substantial adverse effect on a scenic vista?

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

c) Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that proposed solar energy developments within a Class I, Class II, or Class III BLM-managed federal lands would result in significant visual impacts. However, Mitigation Measure AES-1, which requires the preparation of visual studies, and Mitigation Measure AES-8, which requires compliance with the respective federal agency's visual guidelines and policies, would be implemented to reduce impacts on federally managed lands.

While temporary in nature, short-term adverse visual impacts to visual character associated with construction would be potentially significant. Mitigation Measure AES-9, which requires construction-related BMPs and measures to reduce the visual and aesthetic effects of the construction site, would be implemented.

Operational visual impacts resulting from the introduction of solar energy facilities and transmission line connections could be potentially significant. Mitigation Measure AES-1, Mitigation Measure AES-4, which requires natural screens to be installed to protect ground-level views into the project, and Mitigation Measure AES-10, which requires design and installation techniques for overhead electrical transmission connections, would be implemented. Although visual impacts would be reduced with implementation of Mitigation Measures AES-1, Mitigation Measure AES-4, and Mitigation Measures AES-8 through AES-10, impacts would remain significant and unavoidable for questions a) through c).

Impacts from the Proposed Project

The proposed project site is located on private land in the southern portion of Pahrump Valley in Inyo County, California. The project site includes existing dirt roads and abandoned buildings. The project site is surrounded by open space in all directions. The project site is not located near any eligible or designated State scenic highways. The nearest eligible State scenic highway is SR 127 located approximately 20-miles west of the project site (Caltrans 2025). The proposed project would not be located on Bureau of Land Management (BLM) managed lands and therefore, REGPA PEIR Mitigation Measure AES-8, which requires compliance with the respective federal agency's visual guidelines and policies, would not be applicable to the proposed project.

Construction Impacts

Construction-related visual impacts would be short-term and temporary. While temporary in nature, short-term adverse visual impacts to visual character associated with construction would be potentially significant. REGPA PEIR Mitigation Measure AES-9, which requires construction-related BMPs and measures to reduce the visual and aesthetic effects of the construction site, would be implemented to reduce construction-related visual impacts.

Operational Impacts

Operational visual impacts resulting from the introduction of solar energy facilities and transmission line connections could be potentially significant. Visual Simulations were prepared for the project (Appendix C) which shows the proposed infrastructure in relation to the existing conditions and project vicinity. As shown on the Visual Simulations, the proposed project would not degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, as Visual Simulations were prepared, REGPA PEIR Mitigation Measure AES-1, which requires preparation of visual studies, has been satisfied for the proposed project.

Additionally, REGPA PEIR Mitigation Measure AES-4, which requires natural screens to be installed to protect ground-level views into the project, and REGPA PEIR Mitigation Measure AES-10, which requires design and installation techniques for overhead electrical transmission connections, would be implemented into the project design to reduce operational-related visual impacts.

Impact Conclusion

With implementation of Mitigation Measures AES-4, AES-9, and AES-10, the impact for questions a) through c) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that construction activities are not anticipated to result in new sources of substantial light or glare, and therefore, impacts would be less than significant. Operational lighting impacts from exterior security lighting would be consistent with General Plan Policy VIS-1.6 and would therefore not adversely affect nighttime views in the area. Lighting from power towers would result in new substantial sources of daytime lighting. Power towers and electrical transmission towers could require aircraft warning lights, per FAA guidelines. These warning lights could result in new substantial sources of lighting. However, Mitigation Measure AES-5, which requires the preparation of a lighting plan, and Mitigation Measure AES-7, which requires coordination with FAA when considering the use of aircraft warning lights, would be implemented to reduce potential operational lighting impacts. Operational glare from reflective surfaces could result in substantial glare impacts. However, Mitigation Measure AES-2, which requires preparation of glare studies, Mitigation Measure AES-3, which requires the use of colors to blend with the surrounding landscape, and Mitigation Measures AES-6, which requires solar panel glass to be treated with an anti-reflective coating, would be implemented to reduce potential operational glare impacts. Although lighting and glare impacts would be reduced with implementation of Mitigation Measures AES-2, Mitigation Measure AES-3, and Mitigation Measures AES-5 through AES-7, due to the uncertainty of the project location and site-specific details, impacts would remain significant and unavoidable.

Impacts from the Proposed Project

The proposed project site is located on private land in the southern portion of Pahrump Valley in Inyo County, California. The project site includes existing dirt roads and abandoned buildings. The project site is surrounded by open space in all directions.

Construction Impacts

Construction activities would be short-term and temporary and are not anticipated to result in new sources of substantial light or glare.

Operational Impacts

A lighting plan was prepared as part of the project-specific BODR, included as Appendix A. As outlined in the BODR, all site lighting will comply with Inyo County's Outdoor Lighting Ordinance (Title 18.79). The O&M facility and substation would have motion-activated, downward pointing/full cutoff nighttime lighting (designed to limit upward light pollution or across project boundaries) to minimize effects on dark night skies. The lights within the O&M facility would be installed on the exterior of the O&M building and the storage shipping containers. This lighting may also be placed at gates or other locations to provide additional security. Electricity for the lighting would be provided by the local utility via a commercial meter. All operational lighting would be consistent with General Plan Policy VIS-1.6, which requires that all outdoor light fixtures including street lighting, externally illuminated signs, advertising displays, and billboards use low-energy, shielded light fixtures which direct light downward (i.e., lighting shall not emit higher than a horizontal level) and which are fully shielded. Therefore, as a lighting plan

was prepared, REGPA PEIR Mitigation Measure AES-5, which requires the preparation of a lighting plan, has been satisfied for the proposed project.

The proposed project would not require aircraft warning lights as the nearest active airport, Sky Ranch Airport, is located approximately 18-miles south of the project site in Sandy Valley. Hidden Hills Airport is located 1.3-miles northeast of the project site; however, this airport was abandoned about 15-years ago and was removed from the Jeppesen (JEPP) charts. Therefore, Hidden Hills Airport is not an officially recognized airport, according to the FAA. Appendix D provides email confirmation that Hidden Hills Airport is not an officially recognized airport. Therefore, REGPA PEIR Mitigation Measure AES-7, which requires coordination with FAA when considering the use of aircraft warning lights, would not be applicable to the proposed project.

Operational glare from reflective surfaces could result in substantial glare impacts. A Glare Analysis Memo was prepared for the proposed project (Appendix E). As outlined in the Glare Analysis Memo, the PV panels would contain smooth glass with an anti-reflective coating, as required under REGPA PEIR Mitigation Measures AES-6. The Glare Analysis Memo determined that the project would not generate glare and would not require modifications or visual buffers to minimize or limit glare. Therefore, REGPA PEIR Measure AES-3, which requires the use of colors to blend with the surrounding landscape, would not be required. Additionally, as a Glare Analysis Memo was prepared, REGPA PEIR Mitigation Measure AES-2, which requires preparation of glare studies, has been satisfied for the proposed project.

Impact Conclusion

With implementation of REGIA PEIR Mitigation Measure AES-6, construction and operational light and glare impacts would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

The following Mitigation Measures from the REGPA PEIR are applicable to the proposed project, as indicated in the discussion above.

REGPA PEIR MM AES-4: Install natural screens to protect ground-level views into the project

For all proposed solar energy projects greater than 20 MW (utility scale) and for proposed solar energy projects that are commercial scale distributed generation or community scale that have been determined by a qualified County qualified planner to have the potential to impact visual resources within the individual SEDAs and the Owens Valley Solar Array (OVSA), and where existing screening topography and vegetation are absent or minimal, natural-looking earthwork landforms (such as berms or contour slopes), vegetative, or architectural screening shall be installed to screen ground-level views into the project site. The shape and height of the earthwork landforms shall be context sensitive and consider distance and viewing angle from nearby public viewpoints.

REGPA PEIR MM AES-6: Treat PV solar panel glass with anti-reflective coating.

For proposed PV facilities greater than 20 MW (utility scale) and for proposed solar energy projects that are commercial scale or community scale that have been determined by a qualified County planner to have the potential to impact visual resources within the individual SEDAs and the OVSA, glass used to

cover solar panels shall be treated with an anti-reflective coating to further decrease reflection and increase the transmission of light through the glass to the cells.

REGPA PEIR MM AES-9: The project will implement BMPs and measures during construction to reduce the visual and aesthetic effects of the construction site.

The following measures shall be implemented for all proposed solar energy projects greater than 20 MW (utility scale) and for proposed solar energy projects that are commercial scale or community scale that have been determined by a qualified County planner to have the potential to impact visual resources within the individual SEDAs and the OVSA during construction:

- Construction boundaries and staging areas shall be clearly delineated and where appropriate fenced to prevent encroachment onto adjacent natural areas.
- Construction staging and laydown areas visible from nearby roads, residences, and recreational areas shall be visually screened using temporary fencing. Fencing shall be of an appropriate design and color to visually blend with the site's surroundings.
- Existing native vegetation shall be preserved to the greatest extent possible.
- Project grading shall utilize undulating surface edges and contours that repeat the natural shapes, forms, textures, and lines of the surrounding landscape.
- Exposed soils shall be restored to their original contour and vegetation.
- Stockpiled topsoil shall be reapplied to disturbed surfaces.

REGPA PEIR MM AES-10: Projects requiring overhead electrical transmission connections will consider design and installation techniques that reduce visual impacts.

For projects that require overhead electrical transmission connections to existing transmission lines and for the potential off-site transmission corridor to serve the Trona, Chicago Valley, and Charleston View SEDAs, the following shall be considered in the design and alignment of the transmission line connections:

- Avoid placing transmission towers and structures along ridgelines, peaks, or other locations where they would silhouette against the sky and affect the horizon.
- Place transmission corridor connection alignments along edges of clearings or at transition areas (i.e., natural breaks in vegetation or topography).
- To the extent practicable, treat transmission towers and structures with color and surfaces to reduce visual contrast with the surrounding visual landscape. Alternative methods to reduce visual impacts may be considered for structures that cannot use conventional methods of painting without impeding electrical conveyance or without causing long-term environmental impacts through the constant reapplication of paint. These methods may include, but shall not be limited to, galvanizing or similar factory applied conductive non-paint treatments.

- Use of appropriate and context-sensitive transmission tower types (i.e., lattice structures compared to monopoles) to reduce visual contrast with the surrounding visual landscape.

II. AGRICULTURE AND FORESTRY RESOURCES

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (farmlands of concern under CEQA), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with an existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmlands of concern under CEQA to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Environmental Setting

Agriculture is important to the culture, heritage, and economy of the County. Approximately 31,652 acres are designated for agricultural land use in the County General Plan (County 2015).

The Charleston View SEDA is largely undeveloped and not in active agricultural use. Approximately 20,086 acres of the Charleston View SEDA are designated as grazing allotment and managed by the BLM. There is no land in the Charleston View SEDA that is designated as agricultural land in the County General Plan (County 2015). Additionally, no portion of the Charleston View SEDA is mapped as Prime or Unique Farmland or Farmland of Local or State Importance (DOC 2025a).

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.2, *Agriculture and Forestry Resources*, of the REGPA PEIR, with implementation of Mitigation Measures AG-1, AG-2, and AG-3, impacts related to Farmlands would be less than significant.

Discussion of Project Impacts

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that due to budget constraints and lack of published soil surveys, no Prime Farmland, Unique Farmland, nor Farmlands of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program (FMMP) have been identified in Inyo County. However, consistent with the County's goals and policies to conserve and promote agricultural land uses in the County, the County Agricultural Commissioner routinely reviews development proposals adjacent to agricultural operations to ensure they do not significantly impact agricultural operations, which is required under Mitigation Measure AG-1. Mitigation Measure AG-2 would also be implemented which requires site-specific agricultural resource investigations to be completed for proposed solar development projects within the individual SEDAs that are located on land utilized for agricultural operations prior to final project design approval. With implementation of Mitigation Measure AG-1 and AG-2, the impact would be less than significant.

Impacts from the Proposed Project

The proposed project site is not located on or near Prime Farmland, Unique Farmland, nor Farmland of Statewide Importance and is not located on or adjacent to land utilized for agricultural operations. Additionally, based on historical aerial imagery, the project site has not been used historically for agricultural activities. As the project site is not located adjacent to agricultural operations, REGPA PEIR Mitigation Measure AG-1, which requires review of development proposals adjacent to agricultural operations, would not be applicable to the proposed project. Additionally, as the Charleston View SEDA does not include land designated as agricultural land by the County General Plan, REGPA PEIR Mitigation Measure AG-2, which requires site specific investigation for agricultural lands, would not be applicable to the proposed project. The proposed project would not convert any Farmland designated by the FMMP land to a non-agricultural use. The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

b) Would the project conflict with an existing zoning for agricultural use or a Williamson Act contract?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that since the County does not support a Williamson Act program, the project would result in no impact related to a Williamson Act contract. Additionally, all future developments would be consistent with Goal AG-1 of the Conservation/Open Space Element of the County General Plan and therefore, the impact would be less than significant.

Impacts from the Proposed Project

As the County does not support a Williamson Act program, the proposed project would result in no impact related to a Williamson Act contract. Additionally, the project site is zoned OS-40. The proposed project would be implemented consistently with Goal AG-1 of the Conservation/Open Space Element of the County General Plan and would not result in a significant impact to zoning for agricultural use. Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the SEDAs are not zoned for forest land, timberland, or timberland production. Therefore, the project would be no conflict with, or cause for, rezoning of forest land or timberland and as a result, no impact would occur.

Impacts from the Proposed Project

The proposed project is located in the Charleston View SEDA. The project site would not be zoned for forest land, timberland, or timberland production and therefore, would not conflict with, or cause for, rezoning of forest land or timberland. No impact would occur and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that lands within the SEDAs do not meet the PRC Section 12220(g) definition of forest land as land that can support 10 percent native tree cover of any species under natural conditions. Therefore, the project would not result in the loss or conversion of forest land to non-forest use, and no impact would occur.

Impacts from the Proposed Project

The proposed project would be located in the Charleston View SEDA, which does not include forest land that can support ten percent native tree cover of any species under natural conditions, pursuant to PRC Section 12220(g). Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmlands of concern under CEQA to non-agricultural use or conversion of forest land to non-forest use?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that as lands within the SEDAs do not meet the PRC Section 12220(g) definition of forest land, the project would not result in changes to the existing environment which would result in conversion of forest lands to non-forest lands. However, the REGPA PEIR concluded that future development under the REGPA could convert existing agricultural lands to solar facilities. As outlined in question a), Mitigation Measure AG-1, which requires review of development proposals adjacent to agricultural operations, and Mitigation Measure AG-2, which requires site specific investigation for agricultural lands, would be implemented to reduce impacts to a less than significant level. Additionally, the REGPA PEIR concluded that construction and operation of future solar facilities have the potential to provide conditions conducive to non-native invasive plant species introduction and establishment. However, Mitigation Measure AG-3, which requires preparation of a project-specific integrated weed management plan, would be implemented and carried out during the duration of the entire project. With implementation of Mitigation Measures AG-1, AG-2, and AG-3, the impact would be less than significant.

Impacts from the Proposed Project

As outlined in question a), the proposed project site is not located on or near Prime Farmland, Unique Farmland, nor Farmland of Statewide Importance nor is it located on or adjacent to land utilized for agricultural operations. As the project site is not located adjacent to agricultural operations, REGPA PEIR Mitigation Measure AG-1, which requires review of development proposals adjacent to agricultural operations, would not be applicable to the proposed project. Additionally, as the Charleston View SEDA does not include land designated as agricultural land by the County General Plan, REGPA PEIR Mitigation Measure AG-2, which requires site specific investigation for agricultural lands, would not be applicable to the proposed project.

However, construction activities associated with the proposed project could potentially introduce or spread invasive plant species. As outlined in Section 4.4, Construction, the project applicant would perform noxious weed control on-site during construction according to the specifications defined in the project's SWPPP. Additionally, the proposed project would implement REGPA PEIR Mitigation Measure AG-3, which addresses the introduction and spread of noxious weeds, and would develop a project-specific Habitat Restoration, Revegetation, and Noxious Weed Control Plan to minimize potential impacts from the introduction and spread of noxious and invasive weeds due to vehicles entering the construction area. The preparation of the Habitat Restoration, Revegetation, and Noxious Weed Control Plan would satisfy the requirements of REGPA PEIR Mitigation Measure AG-3.

Therefore, with implementation of REGPA PEIR Mitigation Measure AG-3, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

The following Mitigation Measure from the REGPA PEIR is applicable to the proposed project, as indicated in the discussion above.

REGPA PEIR MM AG-3: Invasive plant species or noxious weeds.

To prevent the introduction and spread of noxious weeds, a project-specific integrated weed management plan shall be developed for approval by the permitting agencies, which would be carried out for the duration of the entire project. The plan shall include the following measures, at a minimum, to prevent the establishment, spread, and propagation of noxious weeds:

- The area of vegetation and/or ground disturbance shall be limited to the absolute minimum and motorized ingress and egress shall be limited to defined routes.
- Project vehicles shall be stored on-site in designated areas to minimize the need for multiple washings of vehicles that re-enter the project site.
- Vehicle wash and inspection stations shall be maintained on-site and the types of materials brought onto the site shall be closely monitored.
- The tires and undercarriage of vehicles entering or re-entering the project site shall be thoroughly cleaned.
- Native vegetation shall be re-established as quickly as practicable on disturbed sites.
- Weed Monitor and quickly implement control measures to ensure early detection and eradication of weed invasions.
- Use certified weed-free straw, hay bales, or equivalent for sediment barrier installations.

III. AIR QUALITY

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

An Air Quality and Greenhouse Gas (GHG) Emissions Report was prepared by ERM on October 14, 2026, and is incorporated below and included as Appendix F to this IS/Addendum.

Environmental Setting

The proposed project is located in the Charleston View SEDA, Inyo County, which is part of the Great Basin Valley Air Basin (Basin). The Basin is named for its geological formation of valleys surrounded by mountains. Air rises and sinks in the Basin due to the heat in the valleys and height of the mountains that causes the air and its pollutants to settle in the valleys and basins. The variable climate of the Basin is determined by its diverse terrain and geographic location. The climate of the region is influenced by the Sierra Nevada and is generally semi-arid to arid, characterized by low precipitation, abundant sunshine, frequent winds, moderate to low humidity, and high potential for evapotranspiration.

Air quality in the Basin is regulated by the U.S. Environmental Protection Agency (USEPA) at the federal level, by the California Air Resources Board (CARB) at the State level, by the Great Basin Unified Air Pollution Control District (GBUAPCD) at the regional level, and by the County at the local level.

Regulatory Setting

Criteria Pollutants

Air quality at the regional level is defined by ambient air concentrations of specific pollutants, identified criteria pollutants, are defined and regulated by State and federal law as a risk to the health and welfare of the public, and are categorized into primary and secondary pollutants. Primary air pollutants are those that are emitted directly from sources, including carbon monoxide (CO); reactive organic gases (ROG), also known as volatile organic compounds (VOC);[1] nitrogen oxides (NO_X); sulfur dioxide (SO_2); coarse particulate matter (PM_{10}); fine particulate matter ($PM_{2.5}$); and lead. Of these primary pollutants, CO, SO_2, PM_{10}, $PM_{2.5}$, and lead are criteria pollutants. ROGs and NO_X are criteria pollutant precursors and go on to form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. The principal secondary criteria pollutants are ozone and nitrogen dioxide (NO_2). In addition to being primary pollutants, PM_{10} and $PM_{2.5}$ can be secondary pollutants formed by chemical reactions in the atmosphere.

Ambient air quality is described in terms of compliance with State and national standards and the levels of air pollutant concentrations considered safe to protect the public health and welfare. These standards are designed to protect people most sensitive to respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The USEPA has established national ambient air quality standards (NAAQS) for criteria pollutants. As permitted by the Clean Air Act (CAA), California has adopted the more stringent California ambient air quality standards (CAAQS) and expanded the number of regulated air pollutant constituents.

CARB is required to designate areas of the state as attainment, nonattainment, or unclassified for these standards. An “attainment” designation for an area signifies that pollutant concentrations do not violate the standard for that pollutant in that area. A “nonattainment” designation indicates that a pollutant concentration violated the standard at least once. The area air quality attainment status of the Basin, including Inyo County, is shown in Table 1, *Great Basin Valleys Air Basin Attainment Status*. The Basin is currently in nonattainment for federal and State PM_{10} standards. The Basin is in State nonattainment for ozone (1-hour and 8-hour) standards. Concentrations of all other pollutants meet State and federal standards.

Table 1: Great Basin Valley Air Basin Attainment Status

Pollutant	State of California Attainment Status	Federal Attainment Status
Ozone (1-hour)	Nonattainment	No Federal Standard
Ozone (8-hour)	Nonattainment	Attainment/Unclassified
Suspended Particulate Matter (PM_{10})	Nonattainment	Nonattainment*/Attainment**/Unclassified
Fine Particulate Matter ($PM_{2.5}$)	Attainment	Attainment/Unclassified
Carbon Monoxide (CO)	Attainment	Attainment/Unclassified
Nitrogen Dioxide (NO_2)	Attainment	Attainment/Unclassified
Lead	Attainment	Attainment/Unclassified

[1] CARB defines and uses the term ROGs while the USEPA defines and uses the term VOCs. The compounds included in the lists of ROGs and VOCs and the methods of calculation are slightly different. However, for the purposes of estimating criteria pollutant precursor emissions, the two terms are often used interchangeably.

Sulfur Dioxide (SO_2)	Attainment	Attainment/Unclassified
Sulfates	Attainment	No Federal Standard
Hydrogen Sulfide	Attainment	No Federal Standard
Visibility Reducing Particles	Unclassified	No Federal Standard

Sources: CARB 2025a
*Nonattainment area is the Owens Valley and Mono Basin PM_{10} Planning Area.
**Attainment in the Coso Junction and Mammoth Lake PM_{10} Planning Area.

Toxic Air Contaminants

Toxic air contaminants (TAC) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. TACs can cause long-term chronic health effects such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage, or short-term acute effects such as eye-watering, respiratory irritation (a cough), runny nose, throat pain, and headaches. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For carcinogenic TACs, there is no level of exposure that is considered safe, and impacts are evaluated in terms of overall relative risk expressed as excess cancer cases per one million exposed individuals. Noncarcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

The Health and Safety Code (Section 39655[a]) defines a TAC as “an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health.” All substances that are listed as hazardous air pollutants pursuant to subsection(b) of Section 112 of the CAA (42 United States Code Sec. 7412[b]) are designated as TACs. Under State law, the California Environmental Protection Agency (CalEPA), acting through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

Diesel Particulate Matter

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid materials. The solid material in diesel exhaust is referred to as diesel particulate matter (DPM). Almost all DPM is 10 microns or less in diameter, and 90 percent of DPM is 2.5 microns or less in diameter (CARB 2025b). Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. In 1998, CARB identified DPM as a TAC based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM has a notable effect on California’s population—it is estimated that about 70 percent of the total known cancer risk related to air toxins in California is attributable to DPM (CARB 2025b).

Great Basin Unified Air Pollution District

Rules and Regulations

The GBUAPCD enforces regulations and administers permits governing stationary sources by limiting emissions of criteria air pollutants and TACs. The GBUAPCD has adopted rules and regulations that

regulate visible emissions, nuisance emissions, and fugitive dust emissions (GBUAPCD 2023). The following rules would apply to the project:

- **Rule 216-A. Secondary Sources:** Land development and construction projects must obtain a secondary source permit prior to the start of any land-disturbing activities. The permit must be obtained prior to the grading permit or building permit being issued (whichever comes first).

- **Rules 401 and 402. Fugitive Dust and Nuisance:** Rule 401 requires that airborne particles remain at their place of origin under normal wind circumstances. Mitigation techniques approved by the GBUAPCD must be implemented to ensure the containment of fugitive dust. Rule 401 does not apply to emissions discharged through a stack (point source). Rule 402 specifies that any discharge from any source in quantities of air contaminants or other materials which may cause injury, detriment, nuisance or annoyance, or damage to any public property or considerable number of people should be regulated.

Regional Comprehensive Plan

The Basin is identified as an Isolated Rural area, which means that its emissions are not part of an emissions analysis of any metropolitan planning area or plan. Thus, there is no regional plan to guide growth and transportation in the area.

Inyo County General Plan

Air Quality is addressed within the Public Safety Element of the General Plan 92001, as amended. Section 9.2, Air Quality, of the Public Safety Element contains the following goals and policies to protect air quality in the County:

- Goal AQ-1: Provide good air quality for Inyo County to reduce impacts to human health and the economy.

- Policy AQ-1.1: Regulations to Reduce PM10. Support the implementation of the SIP and the agreement between GBUAPCD and the Los Angeles Department of Water and Power to reduce PM10.

- Policy AQ-1.2: Attainment Programs. Participate in the GBUAPCD's attainment programs.

- Policy AQ-1.3: Dust Suppression During Construction. Require dust-suppression measures for grading activities.

- Policy AQ-1.4: Energy Conservation. Encourage the use of energy-conservation devices in public and private buildings.

- Policy AQ-1.5: Monitor Regional Development. Publicly object to development proposals within the region that do not adequately address and mitigate air quality impacts, especially fugitive dust.

- New Air Quality Implementation Measure, added in REGPA (County 2015). Support appropriate efforts to combine air quality improvements with other social, cultural, and environmental goals, including renewable energy solar facility development.

Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals, known as sensitive receptors, as the most likely to be affected by air pollution: adults over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005; OEHHA 2015). Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptor locations. Examples of these sensitive receptor locations are residences, schools, hospitals, and daycare centers.

Existing sensitive receptors near the project site include residences on Hall Road, 0.15-mile (approximately 800-feet) south of the project site, residences on Hall Lane, 0.40-mile (approximately 2,100-feet) south and east of the project site, and residences on Crystal Road, 0.66-mile (approximately 3,500-feet) east of the project site. A few residences are also located across the California-Nevada state line and within a quarter mile outside of the Charleston View SEDA boundary. There are no hospitals or other non-residence sensitive receptors within the Charleston View SEDA.

Methodology and Assumptions

Emissions were modeled using the California Emissions Estimator Model (CalEEMod), version 2022.1.1.29. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Modeling outputs of Project emissions can be found in Appendix F.

Per CalEEMod User Guide Appendix A, “Land use types are broad categories of land uses with similar operating characteristics. Each of these land use types include several more detailed land use subtypes. CalEEMod has eight land use types: Commercial, Educational, Industrial, Parking, Recreational, Residential, Retail, and Linear. The user-selected land use type is a foundational input to construction and operations modules because it determines many default parameters” (CAPCOA 2022). Industrial was selected as the most appropriate for a solar generation facility and substation.

Construction Assumptions

Watering exposed areas during construction is a standard practice to minimize windblown dust. CalEEMod allows the user to select the number of times watering is performed per day, with a maximum of three times per day. As a conservative estimate, three times per day was used for these calculations, however actual watering could be up to six times per day, as needed.

Construction is anticipated to begin as early as January 2027. In this analysis, it is conservatively assumed that construction would commence in Quarter 4 of 2026. This is considered conservative because older and less efficient vehicles and equipment are expected to be retired and replaced by more efficient units over time, especially as new laws or regulations requiring increased efficiency come into effect. As such, average emissions will decrease over time and assuming an earlier start date is therefore conservative.

Although the project site will be no greater than 2,400-acres, only 89-acres will be graded, primarily for interior access roads along electrical collection line corridors, sediment control/retention basins, the substation, and the operations and maintenance building.

Twenty (20) miles was assumed for the 40 haul trips. These trips include dump trucks, water trucks, waste hauling trucks, and equipment deliveries such as solar panels from warehouses. Some trucks may travel a further distance while others will travel a shorter distance, so 20-miles is a reasonable average and is commonly used as a default value to account for truck traffic within the jurisdiction of GBUAPCD. In addition to water, the onsite and offsite access roads will be graveled to reduce particulate emissions. As a CalEEMod input, a silt content of five percent was used to simulate 1.4-miles of travel on graveled access road.

Operational Assumptions

Operational emissions from an approximately 20 kW propane-powered generator used to provide emergency power the operations and maintenance building were quantified assuming 4 gallons per hour based on generic specifications for a 20 kW propane generator, emission factors from South Coast Air Quality Management District's (SCAQMD) "Combustion Default Emission Factors" guidance document (SCAQMD 2024) for propane combustion, and 100 hours of emergency operation per year. TAC emissions from the generator were calculated using emission factors published by the Santa Barbara County Air Pollution Control District 2023. These emissions, along with project total emissions, can be found in Appendix F.

Significance Criteria

Construction and Operational Emissions

Neither Inyo County nor the GBUAPCD have established numerical significance thresholds for quantitatively determining air quality impacts. CEQA, however, allows lead agencies to rely on standards or thresholds promulgated by other agencies. The REGPA PEIR suggests that the numerical thresholds for Mojave Desert Air Quality Management District (MDAQMD) are adequate to serve as significance thresholds because air quality and pollutant attainment status are similar (County 2015). However, several differences in air quality and pollutant attainment status should be noted. Namely, the project is located in an area designated as attainment for all pollutants, whereas MDAQMD is classified as nonattainment for the federal PM_{10} 24-hour standard as well as the State PM_{10} and $PM_{2.5}$ standards. Therefore, numerical emission thresholds in MDAQMD for PM_{10} and $PM_{2.5}$ are likely to be overly cautious. The REGPA PEIR also states that construction emissions, including TAC emissions from construction activities, should be evaluated qualitatively. Therefore, the construction emissions are quantified for CEQA disclosure purposes but are analyzed qualitatively. This approach found in the REGPA PEIR has been used by other Air Districts. Specifically, implementing BMPs is the construction related threshold of significance for the Bay Area Air District (Bay Area Air District 2022).

Based on the analysis in the REGPA PEIR, solar energy facility projects could result in potentially significant impacts. These impacts require mitigation to reduce them to the maximum extent feasible. The GBUAPCD considers short-term construction equipment exhaust emissions to be less than significant (County 2015).

For operational emissions, the REGPA PEIR states that project operations would have a significant impact to air quality if operational emissions from both direct and indirect sources exceed any of the threshold levels identified in Table 2, *Operational Air Pollutant Significance Thresholds*.

Table 2: Operational Air Pollutant Significance Thresholds

Pollutant	Significance Thresholds (pounds per day)
VOC	137
NO_X	137
CO	548
SO_X	137
PM_{10}	82
$PM_{2.5}$	82

Health Risk Assessment

In addition to numerical emission thresholds, MDAQMD also specify Health Risk Assessment (HRA) thresholds for industrial projects within 1,000-feet of sensitive receptor land uses such as a residence. As there is a residential land use within 1,000-feet directly south of the project location, a health risk screening based on SCAQMD's tools was completed to comply with MDAQMD's HRA thresholds. Specifically, a Tier 2 HRA was performed to conservatively evaluate cancer, chronic, and acute health impacts for both the construction and operational phases of the project.

Although the construction of the project is estimated to be approximately 18-months, 2-years was used as the project duration when evaluating construction impacts since it is the shortest duration available in the tool.

Construction emissions were modeled as a point source at the center of the project area. Using a point source for construction emissions at the center of the project area is conservative for emissions that will be released in the north end of the project area or on roads that are more than 1,000-meters away from residential receptors. This point source approach was also used in a Mitigated Negative Declaration for the Barker-Trona 4 solar project in Inyo County (County 2023).

Meteorological data from the Desert Resorts Regional Airport was used in the tool since the climate is representative of Inyo County. The residential receptor distance during construction was set to 1,000-meters since the nearest residence was more than 1,000 meters from the project area's center.

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.3, *Air Quality*, of the REGPA PEIR, with implementation of Mitigation Measures AQ-1, AQ-2, and AQ-3, air quality impacts would be less than significant.

Discussion of Project Impacts

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that construction activities would be temporary and short-term in nature and would vary day to day depending on the nature of construction. Construction-related dust is addressed in GBUAPCD Rule 401 and 402. The REGPA PEIR also concluded that although operation of

solar facilities could result in reduced dust emissions, their effectiveness would be dependent on a site-specific design. Since details regarding the design of individual solar projects are unknown at the time, project-specific analyses will be necessary to ensure that potential emissions associated with operation comply with the daily emission thresholds. With implementation of Mitigation Measures AQ-1, which requires the preparation of a site-specific air quality technical report, Mitigation Measure AQ-2, which requires fugitive dust and particulate matter emissions to be reduced during construction, and Mitigation Measure AQ-3, which requires implementation of dust control measures during operation, construction and operational-related impacts would be less than significant.

Impacts from the Proposed Project

As the local air district with jurisdiction over the project, the GBUAPCD is the applicable agency tasked with implementing programs and regulations required by the CAA. Project contractors and operators would be required to comply with regional air quality rules promulgated by the GBUAPCD.

The primary air emissions associated with the project would be fugitive dust emissions during construction. Fugitive dust is addressed under GBUAPCD Rules 216A Secondary Sources, 401 Fugitive Dust, and 402 Nuisance. In accordance with GBUAPCD rules, mobile water trucks would also be used on-site throughout the entirety of construction to control the fugitive dust. CARB-certified dust suppressants may also be used on-site to control dust emissions and may remain on certain portions of the project area to reduce dust once the project is put into normal operation.

Development of renewable solar projects in Inyo County was contemplated in the REGPA PEIR as part of the County's REGPA and the project would comply with applicable goals and policies outlined in the REGPA that are meant to reduce air emissions during construction and operation. As outlined in questions b) and c) below, as an Air Quality and Greenhouse Emissions Report was prepared, REGPA PEIR Mitigation Measures AQ-1, which requires the preparation of an air quality technical report, has been satisfied for the proposed project. Additionally, the project applicant would be required to implement fugitive dust and particulate matter reduction measures during construction as outlined in REGPA PEIR Mitigation Measure AQ-2. Given the project's very low operational emissions, REGPA PEIR Mitigation Measure AQ-3 would not be applicable to the project.

Through implementation of on-site fugitive dust control measures consistent with GBUAPCD Rules 216A, 401, and 402 requirements, as well as implementation of REGPA PEIR Mitigation Measure AQ-2, the project would be consistent with applicable air quality plans adopted by the GBUAPCD.

Therefore, with implementation of REGPA PEIR Mitigation Measure AQ-2, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality

standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that although maximum daily construction pollutant impacts could contribute to a cumulatively considerable impact associated with PM_{10} emissions during construction activities, impacts would be temporary, localized to the project site and would not be emitted over long distances. Following completion of project construction, all construction-related criteria pollutant impacts would cease. The REGPA PEIR also concluded that operation of the solar projects associated with implementation of the proposed REGPA is not anticipated to result in a substantial increase in vehicular or stationary emissions once installed. Further, implementation of the REGPA would reduce region-wide emissions by promoting facilities that generate energy from sustainable sources, such as solar, which are not dependent on combustion of fossil fuels to supply energy needs for the region. Therefore, with implementation of Mitigation Measures AQ-1 through AQ-3, construction and operational-related impacts would be less than significant for questions b) and c).

Impacts from the Proposed Project

An Air Quality and GHG Emissions Report was prepared for the proposed project (included as Appendix F). As an Air Quality and Greenhouse Emissions Report was prepared, REGPA PEIR Mitigation Measure AQ-1, which requires preparation of an air quality report, has been satisfied for the proposed project.

Construction Emissions

Construction is scheduled to begin as early as January 2027. Construction-related activities of the proposed project would require approximately 18-months of continuous activity involving two regions. It is noted that construction-related activities that emit air emissions would be a mix of short-term, intermittent, and temporary durations and would vary from equipment usage.

Construction-related activities of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment use, and vehicle emissions. Off-site emissions would be generated by construction workers' daily commute trips and heavy-duty diesel haul and vendor truck trips. Construction-related emissions could vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Construction emissions are quantified and shown in Table 3, *Unmitigated Construction Emissions*.

Table 3: Unmitigated Construction Emissions

Pollutant	Maximum Annual Construction Emissions (pounds per day)
Carbon Monoxide	332.0
Oxides of Nitrogen	95.0
Volatile Organic Compounds	18.0
Oxides of Sulfur	0.7
PM_{10} Dust	179.0
PM_{10} Exhaust	3.4
$PM_{2.5}$ Dust	24.0

$PM_{2.5}$ Exhaust	3.0

As discussed in the REGPA PEIR, "Although maximum daily construction pollutant impacts could contribute to a cumulatively considerable impact associated with the PM_{10} emissions during construction activities, impacts would be temporary, localized to the project site and would not be emitted over long distances. Following completion of project construction, all construction-related criteria pollutant impacts would cease. Accordingly, generation of PM_{10} emissions when combined with other cumulative projects, particularly those occurring nearby and simultaneously, would result in a potentially significant temporary cumulative impact to air quality." GBUAPCD considers short-term construction equipment exhaust emissions to be less than significant. Although the GBUAPCD considers short-term construction emissions less than significant, the project applicant would still be required to implement fugitive dust and particulate matter reduction measures during construction as outlined in REGPA PEIR Mitigation Measure AQ-2.

Operational Emissions

Operational emissions are quantified and shown in Table 4, *Estimated Operational Emissions*.

Table 4: Unmitigated Construction Emissions

Pollutant	Operational Emissions (tpy)	REGPA PEIR Operational Thresholds (tpy)	REGPA PEIR Threshold Exceeded?
Carbon Monoxide	0.27	100	No
Oxides of Nitrogen	0.06	25	No
Volatile Organic Compounds	0.06	25	No
Oxides of Sulfur	0.0007	25	No
PM_{10}	0.06	15	No
$PM_{2.5}$	0.01	12	No

Note: tpy = tons per year

As shown on Table 4, the operational emissions would not exceed the annual thresholds for any criteria pollutant. Given the project's very low operational emissions, REGPA PEIR Mitigation Measure AQ-3 would not be applicable to the project.

Impact Conclusion

GBUAPCD considers short-term construction equipment exhaust emissions to be less than significant. Although the GBUAPCD considers short-term construction emissions less than significant, the project applicant would still be required to implement fugitive dust and particulate matter reduction measures during construction as outlined in REGPA PEIR Mitigation Measure AQ-2. Additionally, as shown in Table 4, operational emissions would not exceed the annual thresholds for any criteria pollutant. Given the project's very low operational emissions, REGPA PEIR Mitigation Measure AQ-3 would not be applicable to the project.

Therefore, with implementation of REGPA PEIR Mitigation Measure AQ-2, the impact for questions b) and c) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that construction-related traffic is not expected to cause an exceedance of CO CAAQS and that construction-related emissions of TACs would not expose sensitive receptors to substantial emissions of TACs. The REGPA PEIR also concluded that operation of the project would not expose sensitive receptors to substantially high concentrations of CO or contribute traffic volumes to intersections that would result in an exceedance of the CO CAAQS and that operations would not generate any major operational sources of TAC or DPM. Therefore, construction and operational-related impacts to sensitive receptors would be less than significant.

Impacts from the Proposed Project

As outlined in the Air Quality and GHG Emissions Report, a Health Risk Screening was performed to evaluate the effects of TACs, including DPM from vehicle engines, and various substances emitted by the propane generator. Health risks associated with the project are presented in Table 5, *Project Health Risk Screening Results*, which shows impacts are well below SCAQMD screening thresholds (SCAQMD 2008).

Table 5: Project Health Risk Screening Results

Health Risk Screening Phase	Risk Type Assessment	Risk Units	Max Risk Value	Risk Threshold	Threshold Exceeded?
Construction	Chronic	Hazard Index	0.004	1.0	No
	Cancer	MICR per Million Exposed	7.57	10	No
Operation	Chronic	Hazard Index	0.00006	1.0	No
	Cancer	MICR per Million Exposed	0.02	10	No
	Acute	Hazard Index	0.02	1.0	No

Note: MICR = Maximum Incremental Cancer Risk

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

e) Would the project create objectionable odors affecting a substantial number of people?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that construction would result in the emission of diesel fumes and other odors typically associated with construction activities; however, odors would be typical of most construction sites and would be temporary in nature. The REGPA PEIR also concluded that the land use of the project is not associated with odor complaints. Therefore, construction and operation of the project would not create objectionable odors affecting a substantial number of people and the impact would be less than significant.

Impacts from the Proposed Project

Construction-related activities would result in diesel exhaust emissions from construction equipment and activities and diesel-fueled vehicles entering and exiting the construction site which may release odors into the atmosphere. However, construction-related emissions would be temporary and intermittent, and are not anticipated to affect a substantial number of local property owners. Furthermore, construction activities would occur within the proposed project area and any potential odors associated with construction would dissipate before affecting property owners adjacent to the project. Operation of the project would not emit any odorous compounds.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

The following Mitigation Measure from the REGPA PEIR is applicable to the proposed project, as indicated in the discussion above.

REGPA PEIR MM AQ-2: Reduce fugitive dust and particulate matter emissions during construction

To control emissions of particulate matter, and to ensure compliance with GBUAPCD Rules 401 and 402 as well as applicable BMPs from Renewable Energy Action Team (REAT) Best Management Practices and Guidance Manual (REAT 2010), solar projects shall implement fugitive dust and particulate matter emissions control measures including, but not limited to the following:

- Water and/or coarse rock all active construction areas as necessary and indicated by soil and air conditions;
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard;
- Pave or apply (non-toxic) soil stabilizers on all unpaved access roads;
- Sweep daily (with water sweepers) all paved access roads;
- Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets;
- Suspend excavation and grading activity when sustained winds make reasonable dust control difficult to implement, e.g., for winds over 25 mph.
- Limit the speed of on-site vehicles to 15 mph.

IV. BIOLOGICAL RESOURCES

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:				
a) Result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans (including the current Draft of the Solano HCP), policies, regulations, or by the CDFG or USFWS?	☐	☐	☐	☒
b) Result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFG or USFWS?	☐	☐	☐	☒
c) Result in a substantial adverse effect on federally regulated wetlands as defined by the Porter-Cologne Water Quality Control Act through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any applicable land use plans, policies, regulations, or ordinances, of an agency with jurisdiction over the project, adopted for the purpose of protecting biological resources or avoiding and mitigating impacts to biological resources?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☒

A Biological Resources Technical Report (BRTR) was prepared by Stantec on November 7, 2025, and is incorporated below and included as Appendix G to this IS/Addendum. The listed technical studies in Appendix G have been augmented with recently completed technical studies, including LeConte's Thrasher CEQA Impact Analysis Memorandum (Appendix Q), Raven Monitoring, Management, and Control Plan (Appendix S), Habitat Restoration, Revegetation, and Weed Management Plan (Appendix T), Desert Kit Fox and American Badger Management Plan (Appendix U) and the proposed project's Mitigation Summary (Appendix V).

Environmental Setting

The project site is located on private land in the southern portion of Pahrump Valley in Inyo County, California. The project site is predominately flat, arid, and sparsely vegetated with elevations that range from approximately 2,550-feet to 2,660-feet amsl.

Soils

According to the Natural Resource Conservation Service (NRCS) Web Soil Survey, majority of the project site is located in the Mojave Desert Area of California, where no NRCS digital data is available. The area immediately northeast of the project site consists of Corbilt gravelly loamy fine sand unit, which is reasonably assumed to be consistent with the site's subsurface conditions. Corbilt gravelly loamy fine sand unit is well drained with low to moderate available water storage (Matt McDonald 2021).

Vegetation

The vegetation in the project area is generally typical of alkali desert scrub and desert scrub vegetation native to southeastern California and is dominated by two types: *Larrea tridentata–Ambrosia dumosa* shrubland alliance (creosote bush–white bursage scrub) on the east and *Atriplex confertifolia* shrubland alliance (shadscale scrub) in the central-west. The western two-thirds of the project area is also interspersed with areas of low vegetative cover dominated by noxious weeds such as cheatgrass (*Bromus tectorum*) and saltlover (*Halogeton glomeratus).*

The site is gridded by dirt roads. Other evidence of anthropogenic disturbance was observed during field surveys, including off-highway vehicle tracks, trails, trash, residences and outbuildings, and evidence of historic cattle grazing.

Methodology

Literature and Database Review

Biological resource data from the Hidden Hills Solar Project, a proposed project with a development footprint overlapping the current project site, was reviewed. According to the biological resources section of the Application for Certification, several special-status plant and animal species were observed during the fall 2010 and spring 2011 surveys, including eight California Rare Plant Rank (CRPR) plant species and 10 wildlife species, which include desert tortoise (*Gopherus agassizii*) and burrowing owl (*Athene cunicularia*) (Hidden Hills Solar, LLC 2011). At least three species of cactus and 11 species of invasive, non-native plants were also documented during the surveys. Sixty-nine desert ephemeral streams were also mapped within the Hidden Hills Solar Project site.

A query of the CDFW California Natural Diversity Database (CNDDB) special-status plant and animal records was conducted using the RareFind 5 internet application (CNDDB 2025). The query consisted of three US Geological Survey quadrangles that include the project area (*Calvada Springs*, *Mound Spring, and Stump Spring*) and eight immediately adjacent in California: *Blackwater Mine, Horse Thief Springs, Nopah Peak, North of Tecopa Pass, Sixmile Spring, Tecopa Pass, Green Monster Mine, and West of Shenandoah Peak.* The results of the CNDDB query for species occurrences with the project area and the surrounding quadrangles within California are included in Appendix G. A species list for the project area generated from the USFWS Information for Planning and Consultation database was also reviewed and

is included in Appendix G. The California National Plant Society (CNPS) Rare Plant Inventory was also queried for all CRPR 1, 2, 3, and 4 species occurring in the same quadrangles included in the CNDDB query (Appendix G).

Additional data regarding the potential occurrence of special-status species and policies relating to these special-status natural resources were gathered from the following sources:

- Natural Community Conservation Plans/Habitat Conservation Plans (CDFW 2024a)
- Inventory of Rare and Endangered Vascular Plants of California (CNPS 2025a)
- USFWS Information for Planning and Consultation (USFWS 2024a)

Field Surveys

Wetlands and Other Waters

Two aquatic resource delineations (ARDs) have been conducted for the project. The initial ARD was conducted for the project by a team of Stantec biologists from September 30 to October 3, 2024, and an accompanying aquatic resources delineation report (ARDR) was drafted. The 2024 ARD study area covered some 2,558-acres, equivalent to the project site (or developed area) at that time plus a 200-foot buffer. However, since the 2024 ARD, the project area has been adjusted to include generation tie-in areas and an access route to the nearest state highway. The 2025 ARD study area covered an additional 150.2-acres, for a total ARD survey area of 2,708.4-acres, and the ARDs were conducted by Stantec biologists in May and June of 2025 (Appendix R).

Both surveys were conducted on foot, and all aquatic resources found on-site were mapped and documented. The field teams visited locations of features mapped in the 3D National Hydrography Dataset and/or National Wetlands Inventory database while traversing the study area to document presence or absence of the features. Data was collected to a sufficient level of detail to inform the jurisdictional assessment for each relevant regulatory agency on a by-feature basis.

Botanical Resources

Stantec conducted a protocol-level floristic survey over two survey periods to correlate with the blooming periods of the species identified in the desktop review (CNPS 2001; CDFW 2018a). The first round of surveys for the field assessment was conducted April 27 to May 2 and May 5 to May 9, 2025; the second round was conducted August 4 to 8 and August 11 to 14, 2025. The botanical survey area included 2,708.4-acres of contiguous parcels divided into 0.5- by 0.5-mile sections, and each section was divided into transects approximately 300-feet-wide. The survey area associated with the gen-tie and access route was divided into transects as appropriate. Per CDFW/CNPS guidelines, all areas were meandered on foot, ensuring as close to 100 percent visual coverage as possible; intuitive control was used to adjust meander widths as appropriate.

Plant species identification and nomenclature followed the Jepson eFlora (2025). The treatment for the genus *Ephedra* in the Jepson eFlora does not currently include *E. torreyana* (Torrey's ephedra), the *Ephedra* treatment from the *Flora of North America North of Mexico* (FNANM) was used to key out all ephedras within the botanical survey area (Stevensen 2021). Stantec botanists sampled vegetation cover and mapped vegetation communities and land cover types in Field Maps within the survey area during both survey visits. After completion of field work, vegetation was classified using the Manual of

California Vegetation (MCV; CNPS 2025b). Each vegetation association was checked for sensitivity against the CDFW Natural Community List (CDFW 2025).

To the extent practicable, nearby reference populations of special-status plant species were visited to determine whether the species was identifiable at the time of the survey. Reference sites were visited on April 27, May 8, and August 4, 2025.

Noxious weed locations were also mapped, including general counts and phenology. For the purposes of the botanical survey, noxious weeds are defined as those rated by the California Invasive Plant Council (Cal-IPC) as High on the current list (Cal-IPC 2025) and/or species included on the California Department of Food and Agriculture's (CDFA's) Weed Pest Rating list (CDFA 2021) or listed as a noxious weed in the California Code of Regulation (CCR) Section 4500.

Special-Status Wildlife

Desert Tortoise

Three desert tortoise surveys have been conducted for the project. All three surveys were conducted under the direction of an authorized desert tortoise biologist, using USFWS guidance and protocol, to determine presence or absence of desert tortoises, estimate the number of tortoises by age class, and estimate the density of desert tortoises.

The first survey was conducted by biologists from Ironwood Consultants, a Stantec subconsultant, October 15 to 24, 2020 (Ironwood 2021); it covered 3,100-acres and included the 2,783-acre project site at that time as well as a 150-foot perimeter buffer (excluding private land areas) and 4.8-kilometers of access roads. The second survey was conducted by Stantec biologists May 20 to 25, 2024 (Stantec 2024); it covered 580.6-acres and surveyed an area just south of the area surveyed by the Ironwood Consultants biologists, encompassing an addition to the project site. The third survey was conducted by Allied Pacific Partners, LLC, biologists April 20, 22, 23-26, 29-30 and May 1-3, 6-10, 13-17, and 20-28, 2025 (Appendix G); it covered 2,452-acres, encompassing the current 2,400-acre project site and the 52-acres that covers the gen-tie corridors and access roads.

During the surveys, biologists walked pedestrian transects spaced ten meters apart adjusting for sighting distance and topography, to achieve 100 percent coverage of the area. They searched for and recorded all signs of desert tortoise including live individuals, scat, burrows, tracks, skeletons, or eggshell fragments using submeter accuracy GPS devises. The 2020 survey also documented presence and potential habitat for burrowing owl, American badger (*Taxidea taxus*), and desert kit fox (*Vulpes macrotis arsipus*). During the 2020 and 2024 surveys, observations and signs of common wildlife and plant species were also recorded. These surveys were conducted in accordance with the USFWS protocol in Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise (USFWS 2019).

Burrowing Owl

A habitat assessment and breeding season protocol surveys for western burrowing owl were conducted by Stantec biologists between March 10 and June 19, 2025. The objective of the surveys was to determine the presence or absence of the species and, if present, to record breeding activity within the survey area. The survey area included the project's proposed 2,400-acre project site, the 52-acres that

covers the gen-tie corridors and access roads, and a 500-foot buffer extending outward from the project site. The surveys were conducted by walking parallel transects roughly 10-meters apart, accounting for topography and sighting distance, through all potential habitat identified by desktop analysis and previous reports.

The habitat assessment, conducted within the survey area concurrently with the first breeding season survey in March 2025, verified the presence of potential habitat within the survey area. Historic burrow observations were visited and verified. Potential burrows were identified, which are defined as burrows or burrow surrogates greater than 11-centimeters in diameter (height and width) and greater than 150-centimeters in depth. The vicinity of each potential burrow was searched for burrowing owl activity or sign at each survey event. If determined potentially active, burrows were revisited by Stantec biologists and observed for a longer duration to determine occupation and breeding status. Some areas within the 500-foot buffer were not surveyed due to access restrictions, and instead, were viewed from a distance using binoculars and spotting scopes.

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.4, *Biological Resources*, of the REGPA PEIR, at a program level of analysis, impacts to biological resources are considered significant and unavoidable for the Charleston View SEDA with implementation of Mitigation Measures BIO-1 through BIO-25. However, during future project level analysis, mitigation measures would be implemented for the individual resources as outlined in the REGPA PEIR. With implementation of Mitigation Measures BIO-1 through BIO-3, BIO-6, BIO-17, BIO-18, BIO-20 through BIO-25, impacts to biological resources are expected to be reduced to a less than significant level for the proposed project.

Discussion of Project Impacts

a) Result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans , policies, regulations, or by the CDFW or USFWS?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that impacts to special-status plant and wildlife species could occur during construction and/or operation of the future solar developments under the REGPA. These impacts are considered to be potentially significant. Impacts to birds from solar flux and luminosity associated with solar thermal power towers, as well as collision with utility scale solar facilities would remain significant and unavoidable even with implementation of Mitigation Measure BIO-18. Additionally, the location of the SEDAs were chosen specifically to minimize potential impacts to biological resources. With implementation of the remaining mitigation measures, impacts to special-status plant and wildlife species would be less than significant.

Impacts from the Proposed Project

A BRTR was prepared for the proposed project (included as Appendix G). As a BRTR was prepared for the project, REGPA PEIR Mitigation Measure BIO-1, which requires preparation of a project-level biological resources evaluation and mitigation and monitoring plan, has been satisfied for the proposed project. Recently completed supplemental technical studies, incorporated by reference into this IS/Addendum, include LeConte's Thrasher CEQA Impact Analysis Memorandum (Appendix Q), Raven Monitoring, Management, and Control Plan (Appendix S), Habitat Restoration, Revegetation, and Weed Management Plan (Appendix T), Desert Kit Fox and American Badger Management Plan (Appendix U) and the proposed project's Mitigation Summary (Appendix V).

Special-Status Plant Species

Potential to Occur

As outlined in the BRTR, the CNDDB and CNPS Rare Plant Inventory queries returned 50 special-status plant species within the queried quads as having a potential to occur. None of the species are State or federally listed species. Based on the review of existing information, species habitat requirements, and habitat characteristics present in the botanical survey area, 30 of the 50 special-status plant species were determined to have some potential to occur in the botanical survey area; three species were detected during the 2025 surveys; eleven species are considered to have a high potential to occur based upon 2011 and 2013 floristic survey results that are also reported in the CNDDB. An additional three species are considered to have a high potential to occur based on the CNDDB query results and presence of suitable habitat. A comprehensive list of all special-status plant species detected during 2025 surveys, including species that were not returned in the database queries are outlined in the Biological Resources Technical Report (BRTR; Appendix G).

Survey Results

A total of 63 plant species were observed during the April/May and August botanical surveys; four are considered noxious weeds, three are invasive, and the remaining 56 are native species. Of the native species, eight are special-status; five are protected under the CDNPA and three are listed by the CNPS with a CRPR; no federally or state-listed species were detected within the botanical survey area. The three species listed by the CNPS were previously documented in the CNDDB as occurring within the survey area.

Special-Status Wildlife Species

Potential to Occur

The CNDDB query returned 11 special status animal species within the queried quads as having potential to occur and the USFWS query added two additional species. Based on the review of existing information, species habitat requirements, and habitat characteristics present in the project area, nine of the 13 special-status wildlife species were determined to have some potential to occur in the project area. In addition, 10 species, including eight species not included in the database query results, are considered present in the wildlife study area (which includes the project area along with the proposed

access route) based on results of the wildlife surveys conducted. A list of wildlife species with some potential to occur in the project area is further discussed in the BRTR (Appendix G).

Wildlife Species Observations

Sixty wildlife species, including nine special-status species, have been observed in the wildlife surveys study area. A complete list of wildlife species and/or wildlife species sign observed within the wildlife surveys study area is presented in the BRTR (Appendix G).

Survey Results

Desert Tortoise

2020 Survey

One live desert tortoise was identified along Stateline Road, which follows the California/Nevada border. Thirty-one other records of sign, including desert tortoise carcasses, were also recorded.

Signs of other species-status wildlife and plant species were identified. Signs of both American badger and desert kit fox included carcasses, scat, burrows, and tracks. There was also an abundance of Botta's pocket gopher (*Thomomys bottae*) activity, commensurate with concentrations of American badger activity, likely due to the latter's heavy reliance on pocket gophers as prey. Burrowing owl sign included two live owls, as well as burrows, pellets, whitewash, and tracks. Other special-status bird species observed include LeConte's thrasher (*Toxostoma lecontei*), loggerhead shrike (*Lanius ludovicianus*), and prairie falcon (*Falco mexicanus*). A portion of a horn, possibly from a desert bighorn sheep (*Ovis canadensis nelsoni*), was documented within the survey area and believed to have washed downslope from the nearby mountains. Torrey's Mormon tea (*Ephedra torreyana*) was also identified.

2024 Survey

Two live desert tortoises, both observed in burrows, were identified in the desert scrub habitat within the eastern one-third of the survey area. Two other burrows and one pellet were also recorded, which were believed to be associated with the two live individuals.

Thirty-two plant species, 10 bird species, two mammal species, and nine reptile species were observed during the survey. A burrowing owl was seen near a burrow complex in the far western part of the survey area, within alkali desert scrub habitat. The burrow complex appeared to be old predator burrows or diggings.

Significant disturbance from human activity was also observed and recorded in the survey area, including a grid of unpaved roads, residences, and outbuildings in the eastern portion of the survey area as well as evidence of off-road vehicle driving and illegal dumping.

2025 Survey

No live desert tortoises were observed during the 2025 surveys; however, 24 burrows and one pallet, a shallow groove beneath a shrub or other foliage that desert tortoises use to rest in during the day, were observed.

Raven Monitoring, Management, and Control Plan

In accordance with REGPA PEIR Mitigation Measure BIO-6, a Raven Monitoring, Management, and Control Plan was prepared in August 2026 and is included as Appendix S to this IS/Addendum. The objective of the Raven Monitoring, Management, and Control Plan is to minimize project-related increases in common raven (*Corvus corax*) abundance and associated predation pressure on the Mojave desert tortoise and other special-status species. The following measures are proposed as project Conditions of Approval (COAs) to avoid or minimize conditions and subsidies that could increase raven abundance and predatory activities.

Water

All water tanks will be secured to prevent leaks. Water use for dust control, vehicle washing, and equipment maintenance will be managed to avoid the creation of standing or pooled surface water. Any accidental releases or accumulation of water will be promptly addressed to eliminate availability to wildlife.

Anthropogenic Food Sources and Trash

All personnel will receive Worker Environmental Awareness Program (WEAP) training prior to working on the project. The training will include requirements for proper food storage, waste management, and trash disposal to minimize the availability of anthropogenic food sources that could attract ravens and other wildlife.

All trash will be disposed of in self-closing, sealable containers with latching lids to prevent wind and wildlife from opening them. All trash receptacles will be regularly inspected and emptied to prevent spillage and maintain sanitary conditions. Trash will be removed from the project site and taken to an appropriate disposal location at least once per week.

Carcasses

To reduce the potential for wildlife vehicle strikes and associated attractants for ravens, project personnel will be required to comply with established project speed limits on all access roads and within work areas. Road-killed animals or other animal carcasses encountered within the project site will be promptly removed from roadways or work areas, reported to biological monitors, and made inaccessible to ravens (e.g., relocated or covered) until properly disposed of. Any carcasses or mortalities of special-status species associated with Project activities will be immediately reported to CDFW, Inyo County, and/or USFWS, as appropriate.

Sites for Nesting, Roosting, and Perching

All buildings, fences, generation-tie line infrastructure, and other vertical structures associated with the project will be designed utilizing BMPs intended to minimize nesting, perching, and roosting per current standards and practices, including applicable and appropriate Avian Powerline Interaction Committee guidelines. Perch and nest deterrents will be installed where necessary and appropriate to discourage use by ravens.

Inactive Nest Removal

The project applicant or a qualified biologist may remove inactive common raven nests from project structures or other anthropogenic features only as authorized by CDFW and/or USFWS and in accordance with applicable state and federal laws and permits. Prior to any nest removal, a qualified biologist will assess occupancy and coordinate with the appropriate wildlife agencies regarding removal requirements and authorization. Any authorized nest removal activities will generally occur outside of the avian breeding season (typically September 1 through December 31) to minimize the potential for impacts to nesting birds.

Nests will be removed in a manner that renders the material unsuitable for reuse (e.g., dismantling to make nesting material unrecognizable), and all nesting material will be disposed of at an appropriate off-site facility (e.g., landfill). Nest removal efforts will focus on nest sites associated with documented offending ravens within the project site.

Raven Monitoring

Raven monitoring and reporting will be implemented to track raven activity and identify potential project-related effects, as outlined below:

- Annual surveys will be conducted during the breeding season to identify and monitor active raven nests built on project infrastructure. If any active raven nests are identified in the project site, biologists will conduct surveys for remains of special-status species beneath nests. Any such remains will be immediately reported to CDFW, Inyo County, and USFWS.

- If raven monitoring indicates an increase in local raven activity attributed to the project, further measures shall be implemented in coordination with USFWS and CDFW to deter ravens from the project site. Measures include actions such as additional worker education, more stringent restrictions on water use or trash disposal, additional installation of nest or perch deterrents on project infrastructure, nest removal, specific measures to “haze” ravens from project infrastructure or subsidies, or lethal removal in coordination with USFWS and CDFW.

- Because the project is likely to attract common ravens over its active life, the project applicant will provide funds to the Renewable Energy Action Team (REAT) account established with the National Fish and Wildlife Foundation (NFWF) to support implementation of a regional common raven management and monitoring program. The contribution will be provided as a one-time payment based on the approved disturbance acreage at a rate of $105 per acre.

- Results of raven monitoring and any implemented management or adaptive measures will be documented and incorporated into annual reporting prepared for the project’s USFWS and CDFW Incidental Take Permits, as applicable

As required by REGPA PEIR Mitigation Measure BIO-6, prior to initiation of any project-related ground disturbing activities, the project applicant would coordinate with the County, CDFW, and USFWS for review and approval of the Raven Monitoring, Management, and Control Plan (Appendix S).

Burrowing Owl

Four burrowing owls, two living burrowing owls and two carcasses, were detected during the breeding season surveys, but no pairs or breeding activity were observed. Numerous potential burrowing owl burrows, and burrowing owl sign in the form of whitewash, feathers, pellets, or bones were also observed within the survey area. Evidence and ground squirrels, mice, insects (especially dragonflies), and reptiles were observed within the survey area, which constitute the prey base for a local burrowing owl population. Burrowing owl predators and sign observed during the survey included short-eared owl (*Asio flammeus)*, red-tailed hawk (*Buteo jamaicensis)*, prairie falcon*,* common raven (*Corvus corax*), desert kit fox (*Vulpes macrotis*), and domestic dogs.

Desert kit fox signs in the form of scat, burrows, and tracks, were also observed during the surveys. Other CDFW special-status bird species observed include short-eared owl, Swainson's hawk (*Buteo swainsoni*), northern harrier (*Circus hudsonius*), and loggerhead shrike. All other common wildlife species observed during the surveys were also recorded.

Recently Listed Special-Status Wildlife Species

LeConte's thrasher (*Toxostoma lecontei*) was designated as a candidate species under the California Endangered Species Act (CESA) in 2026 and currently receives the same protections as a State-listed threatened or endangered species pending completion of the formal status review process.

Due to the recent State designation of LeConte's thrasher and the potentially suitable habitat on the project site, a CEQA Impact Analysis Memorandum was prepared in August 2026 and is included as Appendix Q to this IS/Addendum.

Surveys for LeConte's thrasher were conducted in the project site in May 2026. One survey was conducted during the recommended survey period; however, the full three-survey protocol was not completed. The presence of suitable LeConte's thrasher habitat was confirmed within the project site. Observations of individuals foraging within the project site were recorded during both the 2020 and 2024 desert tortoise survey efforts. In addition, approximately 77 percent of the project site was determined to contain potentially suitable habitat for the species.

The following measures are proposed as project COAs to reduce potential impacts to LeConte's thrasher. Additionally, the project applicant is in the process of obtaining an Incidental Take Permit (ITP) from CDFW for LeConte's thrasher. Coordination with CDFW is currently ongoing at the time this IS/Addendum was prepared.

Pre-Construction Nesting Birds Surveys

If construction occurs during the nesting bird season (1 February through 31 August), a qualified biologist will conduct pre-construction nesting bird surveys within the work area and applicable buffer areas no more than 5 days prior to ground disturbance. If active nests are identified, species-appropriate avoidance buffers will be established and maintained until nesting activities are complete or the nest is

otherwise determined to be inactive by a qualified biologist. Buffer distances may be adjusted based on site conditions, construction activities, and observed bird behavior.

Worker Environmental Awareness Training

Prior to construction, all project personnel will receive Worker Environmental Awareness Training from a qualified biologist. Training will cover LeConte's thrasher, other special-status species that may occur in the project site, applicable regulatory protections, and required avoidance and minimization measures. All personnel will be required to complete training before beginning work on the project. A log will be maintained of all personnel who receive training.

Biological Monitor

A CDFW-approved biological monitor will be present during initial ground-disturbing activities and other construction activities that have potential to take LeConte’s thrasher. The biological monitor will ensure implementation of avoidance and minimization measures, monitor for special-status wildlife, document observations and compliance, and have authority to stop work if activities have the potential to affect LeConte's thrasher or other special-status species until appropriate measures are implemented.

Avian Power Line Interaction Committee Guidelines

Transmission lines and electrical components will be designed, installed, and maintained to reduce the likelihood of bird electrocutions and collisions and to comply with the Migratory Bird Treaty Act, Bald Eagle and Golden Eagle Protection Act, and CESA. Avian Power Line Interaction Committee guidelines will be implemented as appropriate, such as line marking and/or other bird deterrents (spikes, reflectors, owl deterrents).

Compensatory Mitigation

The project applicant proposes to provide compensatory mitigation through habitat preservation at the Kingston View mitigation site, an approximately 1,859-acre property owned by the applicant and located approximately 2 miles southeast of the project site. Habitat assessments determined that approximately 1,594.8 acres (86 percent) of the site consists of potentially suitable Le Conte's thrasher habitat.

Le Conte's thrasher surveys conducted at the mitigation site in May 2026 confirmed both occupancy and breeding activity. Surveyors documented two individuals and an active nest containing three eggs within suitable desert scrub habitat. These observations indicate that the mitigation site supports occupied LeConte's thrasher habitat and conservation values relevant to the species.

The final compensatory mitigation requirements for LeConte's thrasher will be determined through coordination with CDFW as part of the ITP process and may include additional measures beyond those currently proposed.

Impact Conclusion

As outlined in the BRTR, the CNDDB and CNPS Rare Plant Inventory queries returned 50 special status plant species within the queried quads as having a potential to occur and a total of 63 plant species were observed during the April/May and August botanical surveys. REGPA PEIR Mitigation Measure BIO-2, which requires impacts to special status plants to be minimized, would be implemented.

As also outlined in the BRTR, the wildlife data captured from desktop review and field surveys suggest that several special-status animal species may be present in the project area. One federally and State-listed wildlife species, desert tortoise, one state candidate listed species, burrowing owl, were observed during both the 2020 and 2024 desert tortoise surveys. Burrowing owl individuals were additionally observed during the 2025 burrowing owl surveys. Additional special-status wildlife species given rankings by the CDFW and CFGC were also observed during the 2020, 2024, and 2025 desert tortoise and burrowing owl surveys. REGPA PEIR Mitigation Measure BIO-3, which requires impacts to special status wildlife to be minimized, REGPA PEIR Mitigation Measure BIO-6, which requires impacts to the desert tortoise to be minimized, REGPA PEIR Mitigation Measure BIO-7, which requires impacts to special status reptiles (except desert tortoise) to be minimized, REGPA PEIR Mitigation Measure BIO-8, which requires impacts to Swainson's hawk to be minimized, REGPA PEIR Mitigation Measure BIO-9, which requires impacts to burrowing owl to be minimized, REGPA PEIR Mitigation Measure BIO-12, which requires impacts to bald and golden eagle to be minimized, REGPA PEIR Mitigation Measure BIO-14, which requires impacts to bighorn sheep to be minimized, REGPA PEIR Mitigation Measure BIO-17, which requires impacts to American badger and kit fox to be minimized, and REGPA PEIR Mitigation Measure BIO-18, which requires impacts to other special status birds, raptors, migratory birds, nesting birds and bats to be minimized, would be implemented.

Additionally, the project applicant will implement the COAs associated with the LeConte's thrasher and is anticipated to obtain an ITP. Coordination with CDFW is currently ongoing at the time this IS/Addendum was prepared.

With implementation of REGPA PEIR Mitigation Measures BIO-2, BIO-3, BIO-6 through BIO-9, BIO-12, BIO-14, BIO-17, and BIO-18, and with implementation of the COAs listed above for the LeConte's thrasher, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

b) Result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFG or USFWS?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that future development under the REGPA could result in the disturbance or loss of special status natural communities and protected natural areas. Loss or degradation of special status and protected natural communities would be considered a significant impact. However, with implementation of Mitigation Measure BIO-19, which requires impacts to special status natural communities and protected natural areas to be minimized, and Mitigation Measure BIO-22, which requires the preparation of a project-specific integrated weed management plan, impacts to riparian habitat or other sensitive natural communities would be less than significant.

Impacts from the Proposed Project

A BRTR was prepared for the proposed project (Appendix G). As discussed in the BRTR, eleven MCV vegetation alliances and land cover types were mapped within the survey area. Of the 18 MCV vegetation associations, five (407.4-acres) are considered sensitive natural communities by CDFW. Some of the vegetation within the survey area is highly disturbed by human activity and has been impacted by

grading, grazing, and alteration of hydrology. Because of the historical, varied, and ongoing disturbance within and surrounding the survey area, the vegetation communities support a high number of non-native and invasive species. CDFW typically requires a 1:1 or greater mitigation ratio for sensitive natural communities depending on community type. Final mitigation ratios are usually determined in consultation with CDFW. The proposed project would implement REGPA PEIR Mitigation Measure BIO-19, which requires impacts to special status natural communities and protected natural areas to be minimized through the preparation of a management plan in consultation with CDFW and/or USFWS.

As also discussed in the BRTR, four annual noxious weed species were detected in the survey area. These species are listed by Cal-IPC as High, included on the CDFA Weed Pest Rating list, and/or listed as a noxious weed in CCR Section 4500. Noxious weeds are present in most of the botanical survey areas, facilitated by historical and ongoing disturbance. All but a few observations were of plants from the 2024 growing season; very few appeared to have germinated in the 2025 growing season. In areas where noxious weeds were not observed, it is likely that they lie dormant in the seed bank and would be detectable in years outside current drought conditions. In addition, there are likely significantly more *Bromus rubens* (red brome) and *Bromus tectorum* (cheat grass) because all those detected were from 2024 and only detectable because they were under larger plants shielded from being blown away.

The proposed project would implement REGPA PEIR Mitigation Measure BIO-22, which addresses the introduction and spread of noxious weeds, and a project-specific Habitat Restoration, Revegetation, and Noxious Weed Control Plan (Appendix T) to minimize potential impacts from the introduction and spread of noxious and invasive weeds due to vehicles entering the construction area. The preparation of the Habitat Restoration, Revegetation, and Noxious Weed Control Plan satisfies the requirements of REGPA PEIR Mitigation Measure BIO-22.

With implementation of REGPA PEIR Mitigation Measure BIO-19 and BIO-22, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

c) Result in a substantial adverse effect on federally regulated wetlands as defined by Section 404 of the Clean Water Act and/or State protected wetlands as defined by the Porter-Cologne Water Quality Control Act through direct removal, filling, hydrological interruption, or other means?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that future solar development projects have the potential to impact federally protected wetlands and other waters of the US and/or State, and adjacent riparian or wetland vegetation. These impacts are considered to be potentially significant. However, with implementation of Mitigation Measure BIO-20, impacts to federally protected wetlands as defined by Section 404 of the CWA would be less than significant.

Impacts from the Proposed Project

As discussed in the BRTR, during the 2024 and 2025 ARD, 69 aquatic resources were mapped within the surveyed portion of the project area and assessed for potential jurisdiction under USACE, RWQCB, and CDFW. These resources consisted of 64 ephemeral drainages and drainage segments and five water courses/active floodplains. All resources mapped as CDFW watercourses via the Mapping Episodic

Stream Activity protocol were also considered USACE floodplain systems (i.e., compound systems with channel[s] associated with a floodplain) with co-located boundaries. No riparian vegetation, wetlands, seeps, playas, or springs were found in the project area.

All 69 resources were determined to be ephemeral and therefore likely not under the jurisdiction of USACE. In addition, the project area is located within a closed basin, and none of the delineated resources have a surface connection to a traditional navigable water, further supporting a determination of no jurisdiction under USACE. A previously issued USACE Approved Jurisdictional Determination (SPK- 2024-00318, July 24, 2024) for an unrelated Project within the same watershed supports these findings. An Approved Jurisdictional Determination (AJD) was issued for the proposed project by the USACE on August 18, 2026 (SPL-2025-00902) and is included as Appendix R of this IS/Addendum. The AJD notes that the aquatic resources in the project area do not meet the definition of Waters of the United States as defined in 33 Code of Federal Regulation 328.3 and are therefore not jurisdictional under the CWA.

All 69 resources potentially fall under the jurisdiction of both CDFW and the RWQCB. The ARDR further details the characteristics associated with the aquatic features. The results of the ARD are considered preliminary until RWQCB and CDFW provide verification. As the results are preliminary, REGPA PEIR Mitigation Measure BIO-20, which lists measures to be incorporated to avoid, minimize, and mitigate for potential impacts to waters of the State including wetlands, would be implemented.

With implementation of REGPA PEIR Mitigation Measure BIO-20, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that project activities that would interfere with the movement of residents or migratory species or impede fish or wildlife corridors, or nursery habitat would be considered to have a potentially significant impact. However, with implementation of Mitigation Measure BIO-21, impacts to movement or migratory corridors or native wildlife nursery sites would be less than significant. Additionally, the REGPA PEIR concluded that the spread of invasive or noxious weeds would have the potential to have an adverse effect on a variety of special status species and sensitive natural communities through alteration of a broad range of ecological interactions. The spread of invasive plant species or noxious weeds would have a significant impact. However, with implementation of Mitigation Measure BIO-22, which requires the preparation of a project-specific integrated weed management plan, impacts due to the spread of invasive plant species or noxious weeds would be less than significant.

Impacts from the Proposed Project

As discussed in the BRTR, no designated critical habitat (DCH) for desert tortoise or any other listed species is present in the survey area (USFWS 2024b). CDFW's Biographic Information and Observation System (BIOS) Habitat Connectivity Viewer displays both Interstate Connections – California Essential Habitat Connectivity and Areas of Terrestrial Connectivity – Areas of Conservation Emphasis (ACE). The ACE dataset is a compilation and analysis of statewide spatial information in California on biodiversity, rarity and endemism, harvested species, significant habitats, connectivity and wildlife movement, climate vulnerability, climate refugia, and other relevant data (e.g., other conservation priorities such as those identified in the State Wildlife Action Plan, stressors, land ownership). The model addresses as many of CDFW's statewide conservation and recreational mandates as feasible using high-quality data sources (CDFW 2024b).

According to the CDFW BIOS Habitat Connectivity Viewer, the project area is located within a CDFW designated ACE (CDFW 2024b). Three separate model rankings of 2.5-square-mile hexagon grid data are visible within the project area, including ACE Rank 1 (Limited Connectivity Opportunity), ACE Rank 3 (Connections with Implementation Flexibility), and ACE Rank 5 (Irreplaceable and Essential Corridors). ACE Rank 5 includes channelized areas as identified in The Nature Conservancy's Omniscape model and priority species movement corridors. The Nature Conservancy-mapped channelized areas are those areas where surrounding land use and barriers are expected to funnel, or concentrate, animal movement. Channelized areas may represent the last available connection(s) between two areas, making them a high priority for conservation. Further descriptions of the information contained in the dataset of the rankings are included the ACE Dataset Fact Sheet (CDFW 2024c).

The biodiversity scores are based on species distribution and occurrence data from CNDDB and were not adjusted based on the level of urbanization or disturbance present (CDFW 2018b); thus, any grid area may contain pockets of natural habitat that may support native, rare, or endemic species and the survey data is not uniform across the landscape. Isolated populations of rare species with restricted distributions in disturbed areas can result in high irreplaceability scores in those locations (CDFW 2018b). In the case of the project area, the documented large numbers of rare species occurrences may be due in part to the intensity of survey effort in the general vicinity of the project area, and not necessarily implicative of uniqueness or high quality of the area as an Irreplaceable and Essential Corridor.

As the project area is located within a CDFW designated ACE, the project would implement REGPA PEIR Mitigation Measure BIO-20, which requires implementation of measures to minimize impacts to movement or migratory corridors or native wildlife nursery sites.

Four annual noxious weed species were detected in the survey area. These species are listed by Cal-IPC as High, included on the CDFA Weed Pest Rating list, and/or listed as a noxious weed in CCR Section 4500. Noxious weeds are present in most of the botanical survey areas, facilitated by historical and ongoing disturbance. All but a few observations were of plants from the 2024 growing season; very few appeared to have germinated in the 2025 growing season. In areas where noxious weeds were not observed, it is likely that they lie dormant in the seed bank and would be detectable in years outside current drought conditions. In addition, there are likely significantly more *Bromus rubens* (red brome) and *Bromus tectorum* (cheat grass) because all those detected were from 2024 and only detectable because they were under larger plants shielded from being blown away.

The proposed project has implemented REGPA PEIR Mitigation Measure BIO-22, which addresses the introduction and spread of noxious weeds, through the development of a project-specific Habitat Restoration, Revegetation, and Noxious Weed Control Plan to minimize potential impacts from the introduction and spread of noxious and invasive weeds due to vehicles entering the construction area. The Habitat Restoration, Revegetation, and Noxious Weed Control Plan in presented in Appendix T and satisfies the requirements of REGPA PEIR Mitigation Measure BIO-22.

Therefore, with implementation of REGPA PEIR Mitigation Measure BIO-21 and BIO-22, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

e) Conflict with any applicable land use plans, policies, regulations, or ordinances, of an agency with jurisdiction over the project, adopted for the purpose of protecting biological resources or avoiding and mitigating impacts to biological resources?

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the County strives to conserve biological resources within its boundaries. The General Plan contains a goal (BIO-1) and associated polices related to maintaining and enhancing the biological diversity and healthy ecosystems in the County. The locations of the SEDAs were chosen specifically to minimize potential impacts to biological resources. Constraining solar developments in the County and guiding those developments to previously disturbed areas within each SEDA and the OVSA as proposed under the REGPA would be consistent with BIO-1. Implementation of the REGPA would be consistent with the policies of the General Plan protecting biological resources.

Although the SEDAs and OVSA are within the boundaries of proposed Habitat Conservation Plans (HCP), neither HCPs, Desert Renewable Energy Conservation Plan (DRECP) and Owens Valley Land Management Plan (OVLMP) are not currently approved or being implemented. If eventually approved, the OVLMP HCP would only apply to actions on Los Angeles Department of Water and Power (LADWP) lands. Pursuant to existing policies of the General Plan, future development on BLM or LADWP lands under the REGPA would be required to be consistent with that HCP. If the DRECP is approved, future projects within the boundaries of the DRECP would be required to comply with the requirements of the HCP, although the County would get Section 10 coverage only if It becomes a signatory to the DRECP. Implementation of the REGPA would be consistent with the regionally occurring HCPs, if approved. Therefore, the impact for questions e) and f) would be less than significant.

Impacts from the Proposed Project

As outlined in the REGPA PEIR, the County strives to conserve biological resources within its boundaries. The General Plan contains a goal (BIO-1) and associated polices related to maintaining and enhancing the biological diversity and healthy ecosystems in the County. The locations of the SEDAs, including the project site, were chosen specifically to minimize potential impacts to biological resources. Constraining

solar developments in the County and guiding those developments to previously disturbed areas within each SEDA and the OVSA as proposed under the REGPA would be consistent with BIO-1.

The project site is located within the DRECP Planning Area Boundary. In 2016, BLM signed its Record of Decision approving the DRECP Land Use Plan Amendment, which covers the 10 million acres of BLM-managed lands in the DRECP Plan Area. In 2022, the BLM and CDFW signed a 2022 amendment to the Durability Agreement and Co-Management Plan, which is a key conservation agreement that provides innovative tools to manage impacts to wildlife and their habitats in California. The JB Eastern Slope Mitigation Lands is the first state-required mitigation project on BLM-managed public lands in the California Desert Conservation Area. These lands encompass 158,000-acres that will be restored to improve habitat for desert Tortoise, Mohave ground squirrel, burrowing owl and the American badger. The proposed project would be located on private land within the DRECP; however, the project would not be located on BLM-managed land. As the project is not located on BLM-managed land, the project would not be subject to DRECP.

Additionally, the project applicant is in the process of obtaining an ITP under the USFWS General Conservation Plan for the Desert Tortoise, and coordination with USFWS is ongoing at the time this IS/Addendum was prepared. The project would comply with the applicable requirements of the USFWS General Conservation Plan for the Desert Tortoise of California.

Therefore, the impact for questions e) and f) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures from the REGPA PEIR

The following Mitigation Measures from the REGPA PEIR are applicable to the proposed project, as indicated in the discussion above.

REGPA PEIR Mitigation Measure BIO-2: Minimize impacts to special status plants.

Prior to the approval of any solar development projects or related infrastructure under the REGPA, a CDFW-approved botanist shall evaluate the potential for special status plant species to occur on the site and conduct surveys, if necessary, to determine presence or infer absence of special status plants on the site following the November 24, 2009 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* or the most current guidelines. When special status plants are found on a site, the project shall be redesigned or modified to avoid direct and indirect impacts on special status plants, to the maximum extent feasible, as determined by the County. In order to avoid direct and indirect impacts to special status plants, the projects should be re-sited or re-configured to provide an avoidance buffer of at least 0.25-mile from special status plant populations to account for the physical and biological processes that provide these species with their habitat and pollinator needs.

If special status plants are identified in the project area and complete avoidance of direct and indirect impacts is not feasible as determined by the County, the following measures shall be implemented to avoid and minimize impacts on special status plants:

- If feasible, when special status plants are found on a site, the project shall be redesigned or modified to avoid direct and indirect impacts on special status plants, as determined by the

County. In order to avoid direct and indirect impacts to special status plants, the projects should be re-sited or re-configured to provide an avoidance buffer of at least 0.25-mile from special status plant populations to account for the physical and biological processes that provide these species with their habitat and pollinator needs.

- For projects that are determined to have the potential to result in "take" of state or federally listed plant species, consultation shall be conducted with CDFW or USFWS respectively prior to project commencement, and appropriate mitigation measures developed if necessary.

- No project shall destroy the entire known population of a special status plant species within any SEDA or the OVSA. When individuals of a special status species occur within an area proposed for construction and take cannot be avoided mitigation shall be developed in coordination with USFWS and/or CDFW to reduce impacts on the local population of the special status species. Mitigation measures approved by USFWS and/or CDFW may include transplantation under the direction of a CDFW-approved botanist if transplantation of such species is deemed likely to succeed, or seed shall be collected prior to destruction of the plants and dispersed in suitable habitats not impacted by construction, if such habitats exist and seed collection is deemed likely to be successful by a CDFW-approved botanist with experience propagating the species in question. In all cases, CDFW will be notified at least 10 days prior to removal of any special status plant to allow transplantation or collection of seed at their discretion.

- If transplanting is proposed, the botanist shall coordinate with the appropriate resource agencies and local experts to determine whether transplantation is feasible. If the agencies concur that transplantation is a feasible mitigation measure, the botanist shall develop and implement a transplantation plan through coordination with the appropriate agencies. The special status plant transplantation plan shall involve identifying a suitable transplant site; moving some or all of the plant material and seed bank to the transplant site; collecting seed material and propagating it in a nursery (in some cases it is appropriate to keep plants onsite as nursery plants and sources for seed material); and monitoring the transplant sites to document recruitment and survival rates. Monitoring shall be conducted for a period of five years and transplantation shall be considered successful if an 80 percent survival rate has been achieved by the end of the five-year monitoring period.

- A mitigation and monitoring plan shall be developed by a qualified botanist/ restoration ecologist and submitted to CDFW for approval prior to approval of the proposed project. The mitigation and monitoring plan will dictate appropriate avoidance and minimization measures, compensatory mitigation, and monitoring requirements as pertinent to the specific species and level of impact(s). Mitigation shall include, but is not limited to 1) protection of special status plant populations not directly impacted by construction or implementation of the project as stated above; 2) transplantation and/or collection of seed from impacted plants if feasible, as stated above; and, 3) the preservation in perpetuity of an equivalent or larger off-site population for every individual or population of special status plant impacted including sufficient land surrounding the preserved population to ensure its survival in perpetuity as determined by a qualified botanist/ restoration ecologist. The qualified botanist/ restoration ecologist shall include plans to restore and enhance the preserved populations to the extent feasible.

- If any solar development projects are proposed in the Laws SEDA that would require groundwater pumping, a hydrologic study shall be conducted to determine the potential for

impacts to the hydrology of Fish Slough and/or populations of Fish Slough milk- vetch, pursuant to Mitigation Measure HYD-2 in Section 4.9, Hydrology and Water Quality. If any solar development projects are proposed in the Chicago Valley or Charleston View SEDAs that would require groundwater pumping, a hydrologic study shall be conducted to determine the potential for down-watershed impacts to the habitats for special status plants in the Amargosa Watershed including the portion of the Amargosa River that has been designated by Congress as "Wild and Scenic." If such studies conclude that any project has the potential to result in indirect impacts to the hydrology of off-site habitat for special status plant species (e.g., Fish Slough, marshes, riparian areas, alkaline flats in the Amargosa Watershed and the portion of the Amargosa River that has been designated by Congress as "Wild and Scenic"), a management plan will be prepared in coordination with the County and submitted to the appropriate resource agency with oversight for the species or habitat in question. The plan shall describe any appropriate monitoring, such as vegetation and/or water table monitoring, and prescribe mitigation to offset the impacts of the project on off-site habitat for special status plants such as preservation of suitable habitat or funding of activities to restore, enhance or conserve habitat within the County.

REGPA PEIR Mitigation Measure BIO-3: Minimize impacts to special status wildlife.

Prior to the approval of any solar development projects or related infrastructure under the REGPA with the potential to impact special status wildlife as determined by a qualified biologist, a CDFW-approved wildlife biologist shall conduct a survey to document the presence or absence of suitable habitat for special status wildlife in the project site. The following steps shall be implemented to document special status wildlife and their habitats for each project, as determined by the CDFW-approved wildlife biologist:

- Review Existing Information. The wildlife biologist shall review existing information to develop a list of special status wildlife species that could occur in the project area or be impacted by the proposed project, either directly or indirectly (e.g., groundwater pumping could result in indirect impacts to off-site habitats for special status wildlife). The following information shall be reviewed as part of this process: the USFWS special status species list for the project region, CDFW's CNDDB, previously prepared environmental documents, and USFWS issued biological opinions for previous projects. If the project is taking place on BLM or state administered lands (e.g., BLM, State Trust Lands), the list of special status wildlife from that land managing agency shall be obtained and reviewed in addition to the lists previously mentioned.

- Coordinate with State and Federal Agencies. The wildlife biologist shall coordinate with the appropriate agencies (CDFW, USFWS, BLM) to discuss wildlife resource issues in the project region and determine the appropriate level of surveys necessary to document special status wildlife and their habitats.

- Conduct Field Studies. The wildlife biologist shall evaluate existing habitat conditions and determine what level of biological surveys may be required. The type of survey required shall depend on species richness, habitat type and quality, and the probability of special status species occurring in a particular habitat type. Depending on the existing conditions in the project area and the proposed construction activity, one or a combination of the following levels of survey may be required:

- Habitat Assessment. A habitat assessment determines whether suitable habitat is present. The wildlife biologist shall conduct project-specific habitat assessments consistent with protocols and guidelines issued by responsible agencies for certain special status species (e.g., USFWS' and CDFW have issued protocols for evaluating bald eagle habitat (2004 Protocol for Evaluating Bald Eagle Habitat and Populations in California). Habitat assessments are used to assess and characterize habitat conditions and to determine whether return surveys are necessary. If no suitable habitat is present for a given special status species, no additional species-focused or protocol surveys shall be required.

- Species-Focused Surveys. Project-specific species-focused surveys (or target species surveys) shall be conducted if suitable habitat is present for special status wildlife and if it is necessary to determine the presence or absence of the species in the project area. The wildlife biologist shall conduct project-specific surveys focusing on special status wildlife species that have the potential to occur in the region. The surveys shall be conducted during a period when the target species are present and/or active.

- Protocol-Level Wildlife Surveys. The wildlife biologist shall conduct project specific protocol level surveys for special status species with the potential to be impacted by the proposed project. The surveys shall comply with the appropriate protocols and guidelines issued by responsible agencies for the special status species. USFWS and CDFW have issued survey protocols and guidelines for several special- status wildlife species that could occur in the project region, including (but not limited to): bald eagle, burrowing owl, golden eagle, Swainson's hawk, least Bell's vireo, willow flycatcher, desert tortoise, and desert kit fox. The protocols and guidelines may require that surveys be conducted during a particular time of year and/or time of day when the species is present and active. Many survey protocols require that only a USFWS- or CDFW-approved biologist perform the surveys. The project proponent shall coordinate with the appropriate state or federal agency biologist before the initiation of protocol level surveys to ensure that the survey results would be valid. Because some species can be difficult to detect or observe, multiple field techniques may be used during a survey period, and additional surveys may be required in subsequent seasons or years as outlined in the protocol or guidelines for each species. Individual, project-specific impact analysis and/or management plans for potentially present sensitive wildlife species within the project footprint are presented in Appendix Q (LeConte's Trasher CEQA Impact Analysis) and Appendix U (Desert Kit Fox and American Badger Management Plan).

- Habitat Mapping. The wildlife biologist shall map special status wildlife or suitable habitat identified during the project-specific field surveys. The project-specific Habitat Restoration, Revegetation, and Weed Management Plan is presented in Appendix T; the proposed project's mitigation strategy is summarized in Appendix V.

- A Scientific Collecting Permit is required to take, collect, capture, mark, or salvage, for scientific, educational, and non-commercial propagation purposes, mammals, birds and their nests and eggs, reptiles, amphibians, fishes and invertebrates (Fish and Game Code Section 1002 and Title 14 Sections 650 and 670.7). All biologists will be required to obtain a Scientific Collecting Permit that may be required to handle any live or dead animals during construction or operation of a project.

In addition, the following measures should be implemented to avoid and minimize impacts on special status species and their habitats if they occur within a site:

- For projects that are determined to have the potential to result in "take" of state or federally listed animal species, consultation shall be conducted with CDFW or USFWS respectively and appropriate mitigation measures developed as necessary, and take authorization shall be obtained prior to project commencement, if relevant.

- If ground disturbing activities are required prior to site mobilization, such as for geotechnical boring or hazardous waste evaluations, a CDFW-approved biologist shall be present to monitor any actions that could disturb soil, vegetation, or wildlife.

- In areas that could support desert tortoise or any other sensitive wildlife species, a qualified biologist with the appropriate CDFW and/or USFWS approvals for the species being salvaged and relocated shall be on-site and respond accordingly should an animal need to be relocated.

REGPA PEIR Mitigation Measure BIO-6: Minimize impacts to desert tortoise.

The following measures shall be implemented for any solar development project(s) or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect desert tortoise in order to avoid, minimize, and mitigate impacts:

- Consultation shall be conducted with CDFW and USFWS for any projects where desert tortoise or signs of their presence are found on the site and/or the project is determined by a CDFW-approved biologist to have the potential to impact desert tortoise. In such cases, permits under Section 2080 of the Fish and Game Code and Section 7/10 of Federal Endangered Species Act (FESA) authorizing incidental take of desert tortoise will be obtained from CDFW and USFWS respectively prior to implementation of the project, including any project-related ground disturbing activities. All requirements of the 2081/2080.1 permit and the Biological Opinion shall be implemented.

- The project proponent shall fully mitigate for habitat loss and potential take of desert tortoise. The project specific mitigation shall be developed in coordination with CDFW and USFWS and would be reflective of the mitigation measures described in the Biological Opinion prepared by the USFWS for the project.

- The project developer shall provide funds for regional management of common ravens through the payment of a per-acre fee as determined in consultation with the USFWS. The fee shall be commensurate with current per-acre fees (at the time of project approval) required by the BLM and the CEC for development projects in the desert with the potential to provide subsidies to common ravens such as shelter, perching sites, and food. The fee shall be used by the Desert Managers Group to manage common ravens in the California desert with the goal of reducing their predation on desert tortoises.

- Projects shall not be sited within areas identified for desert tortoise recovery or conservation according to the Draft Revised Recovery Plan for the Mojave Population of the Desert Tortoise (Gopherus agassizii) (USFWS 2011) (such as designated critical habitat, Area of Critical

Environmental Concern [ACEC], Desert Wildlife Management Area [DWMA], priority connectivity areas, and other areas or easements managed for desert tortoises).

- On project sites containing desert tortoise, consultation shall be conducted with USFWS and CDFW to determine the need for and/or feasibility of conducting desert tortoise translocation (changing location or position) to minimize the taking of the tortoises, if they are observed within the proposed project area. Federal translocation plan guidance may be accessed at: http://www.fws.gov/ventura/speciesinfo/protocols_guidelines/. Translocation plan development and implementation may require, but not be limited to: additional surveys of potential recipient sites; translocated and resident tortoise disease testing and health assessments; monitoring protocols; and consideration of climatic conditions at the time of translocation. Due to the potential magnitude of proposed renewable energy project impacts on desert tortoises, USFWS and CDFW must evaluate translocation efforts on a project by project basis in the context of cumulative effects.

- A desert tortoise authorized biologist approved by CDFW and USFWS shall be contracted to oversee and be responsible for ensuring compliance with desert tortoise avoidance and minimization measures before initiation of and during ground-disturbing activities. The desert tortoise biologist shall conduct clearance surveys, tortoise handling, artificial burrow construction, egg handling, and other procedures in accordance with the Guidelines for Handling Desert Tortoise During Construction Projects (Desert Tortoise Council 1999) or the most current USFWS guidance. The desert tortoise biologist shall be present on site from March 15 through October 31 (active season) during ground disturbing activities in areas outside the tortoise exclusion fencing. It is recommended that the biologist be on call from November 1 to March 14 (inactive season) and checks such construction areas immediately before construction activities begin.

- Refer to the Ventura Fish and Wildlife Office website http://www.fws.gov/ventura/endangered/species/surveys-protocol.html for desert tortoise authorized biologist and monitor responsibilities and qualifications, and survey and translocation guidance, and refer to the Nevada Fish and Wildlife Office (desert tortoise recovery office) website http://www.fws.gov/nevada/desert_tortoise/dtro/.html for desert tortoise federal recovery plan documents. Methods for clearance surveys, fence specification and installation, tortoise handling, artificial burrow construction, egg handling and other procedures shall be consistent with those described in the 2013 USFWS Desert Tortoise Field Manual available at the Ventura Fish and Wildlife Office website listed above, or more current guidance provided by CDFW and USFWS. All terms and conditions described in the Biological Opinion for the project prepared by the USFWS shall be implemented.

- The project owner shall undertake appropriate measures to manage the construction site and related facilities in a manner to avoid or minimize impacts to desert tortoise. These measures include, but are not limited to, the following:

    - The project applicant shall notify the USFWS and CDFW prior to project commencement and prior to the commencement of any ground disturbing activities.

    - Before starting project ground disturbing activities, the project proponent shall avoid potential desert tortoise harm by incorporating desert tortoise exclusion fencing into

permanent fencing surrounding the proposed facility, and installing desert tortoise exclusion fencing around temporary project construction areas such as staging area, storage yards, excavations, and linear facilities. The tortoise exclusion fencing shall be constructed consistent with the USFWS 2010 Desert Tortoise Exclusion Fence Specifications or the most current guidance provided by USFWS and CDFW, and should be constructed in late winter or early spring to minimize impacts to desert tortoise and accommodate subsequent tortoise surveys.

- Within 24-hours before starting tortoise exclusion fence construction, the desert tortoise biologist shall survey the fence alignment and utility right-of-way alignments and clear desert tortoises from the area. The surveys and relocation methods shall be conducted using techniques approved by the CDFW and USFWS. Following construction of the tortoise exclusion fence, the desert tortoise biologist shall conduct clearance surveys within the fenced area to ensure as many desert tortoises as possible have been removed from the site. Burrows and tortoises identified within the project area shall be handled according to the 2013 USFWS Desert Tortoise Field Manual, and tortoises requiring relocation shall be handled in accordance with the project Desert Tortoise Relocation/Translocation Plan.

- Heavy equipment may enter the project site following the completion of project area desert tortoise clearance surveys by the desert tortoise biologist. Monitoring initial clearing and grading activities by the biologist will help ensure that tortoises missed during the initial clearance survey are moved from harm's way.

- The desert tortoise biologist shall be responsible for appropriate documentation and reporting to the permitting agencies for desert tortoises handled, in accordance with the project Desert Tortoise Relocation/Translocation Plan.

- Security gates shall be designed with minimal ground clearance to deter ingress by tortoises. The gates shall be kept closed, except for the immediate passage of vehicles, to prevent desert tortoise passage into the project area. Following installation of the desert tortoise exclusion fencing, both the permanent site fencing and temporary fencing in the utility corridors, the fencing shall be regularly inspected by the biological monitor. The biological monitor shall ensure that damage to the permanent or temporary fencing is immediately blocked to prevent tortoise access and permanently repaired within 72-hours between March 15 and October 31, and within seven days between November 1 and March 14. The biological monitor shall inspect permanent fencing quarterly and after major rains to ensure fences are intact and there is no ground clearance under the fence that would allow tortoises to pass. The biologist shall inspect construction pipes, culverts, or similar structures: (a) with a diameter of one inch or greater, (b) stored for one or more nights, (c) less than 8-inches aboveground, and (d) within desert tortoise habitat (outside the permanently fenced area), before the materials are moved, buried, or capped. As an alternative, the materials may be capped before storing outside the fenced area or placing on pipe racks. Inspection or capping is not necessary if the materials are stored within the permanently fenced area after completing desert tortoise clearance surveys.

  - The project proponent shall ensure vehicular traffic does not exceed 25 mph within the delineated project areas or on access roads in desert tortoise habitat. On unpaved roads suppress dust and protect air quality by observing a 10-mile per hour speed limit.

  - To avoid vehicle impacts to desert tortoise, workers shall be responsible for inspecting the ground under the vehicle for the presence of desert tortoise any time a vehicle or construction equipment is parked in desert tortoise habitat outside the permanently fenced area. If a desert tortoise is seen, it may move on its own. If it does not move within 15-minutes, the desert tortoise biologist may remove and relocate the animal to a safe location.

- The project proponent shall develop and implement a Desert Tortoise Relocation/Translocation Plan that is consistent with current USFWS approved guidelines. The goal of the plan will be to safely exclude desert tortoises from within the fenced project area and relocate/translocate them to suitable habitat capable of supporting them, while minimizing stress and potential for disease transmission. The plan shall be developed in consultation with the USFWS to ensure the document does not conflict with conditions issued under an Incidental Take Statement. The plan will utilize the most recent USFWS guidance on translocation that includes siting criteria for the translocation site and control site, methods for translocation/relocation including the holding pen, and post translocation/relocation monitoring. Development and implementation of a translocation plan may require, but may not be limited to, additional surveys of potential recipient sites; disease testing and health assessments of translocated and resident tortoises; and consideration of climatic conditions at the time of translocation. The plan shall designate a relocation site as close as possible to the disturbance site that provides suitable conditions for long term survival of the relocated desert tortoise and outline a method for monitoring the relocated tortoise.

- The Desert Tortoise Relocation/Translocation Plan must be approved by the County, CDFW and USFWS prior to any project-related ground disturbing activity. Plans may also be subject to approval by the County as part of the conditions of approval for future projects.

- Within 30-days after initiation of relocation and/or translocation activities, the Designated Biologist shall provide to the Project Manager for review and approval, a written report identifying which items of the plan have been completed, and a summary of all modifications to measures made during implementation of the plan. Written monthly progress reports shall be provided to the Project Manager for the duration of the plan implementation.

- The project proponent shall design and implement a Raven Monitoring, Management, and Control Plan that is consistent with the most current USFWS raven management guidelines. The goal of the plan shall be to minimize predation on desert tortoises by minimizing project-related increases in raven abundance. The plan shall be approved by the County, CDFW and USFWS prior to the start of any project-related ground disturbing activities. Plans may also be subject to approval by the County as part of the conditions of approval for future projects.

REGPA PEIR Mitigation Measure BIO-7: Minimize impacts to special status reptiles (except desert tortoise).

The following measures shall be implemented for any solar development project(s) or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect special status reptiles (with the exception of desert tortoise which has separate mitigation measures):

- Surveys for special status reptiles including but not limited to northern sagebrush lizard, Panamint alligator lizard, and Mojave fringe-toed lizard shall be conducted by a CDFW-approved biologist with experience surveying for and/or handling these species. If construction is scheduled to commence during the optimal period of identification for these species, then surveys shall be conducted within two weeks prior to the commencement of construction. If construction is not scheduled to commence during the optimal period of identification for these species, then surveys shall be conducted during the optimal period of identification for these species (in the calendar year prior to construction) and again within two weeks prior to the commencement of construction.

- If any of these species are found on a project site during the surveys, CDFW will be contacted and avoidance and mitigation measures appropriate to the species will be developed. Avoidance measures could include actions such as waiting to begin construction until the animal passively disperses from the project site, active relocation of the animal, or allowing construction to begin with the institution of an appropriate no disturbance buffer until the animal has passively dispersed. Mitigation measures could include restoration of temporarily disturbed habitats.

- If federal or state-listed reptiles not discussed above are determined to have the potential to occur on a project site or otherwise be impacted by the project, consultation shall be conducted with USFWS and CDFW respectively to determine the survey protocol and mitigation measures appropriate to the species.

REGPA PEIR Mitigation Measure BIO-8: Minimize impacts to Swainson's hawk.

The following measures shall be implemented for any solar development project(s) or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect Swainson's hawk:

- Surveys shall be conducted for Swainson's hawk by a CDFW-approved biologist according to the 2010 Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California (CDFG 2010) or more recent guidance, unless otherwise directed by CDFW. This guidance dictates survey methods for detecting Swainson's hawk nesting in or in the vicinity of a project site and measure to avoid and/or reduce impacts to nesting Swainson's hawk if they are found. The project applicant shall be responsible for coordinating with CDFW and ensuring that the CDFW guidance is implemented.

REGPA PEIR Mitigation Measure BIO-9: Minimize impacts to burrowing owl.

The following measures shall be implemented for any solar development project(s) or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect burrowing owl, unless otherwise directed by CDFW:

- In the calendar year that construction is scheduled to commence, surveys will be conducted by a CDFW-approved biologist to determine presence/absence of burrowing owls and/or occupied burrows in the project site and accessible areas within 500-feet according to the CDFW's Staff Report on Burrowing Owls (CDFG 2012). A winter non-breeding season survey will be conducted between December 1 and January 31 and a nesting breeding season survey will be conducted between April 15 and July 15 according to established protocols (CDFG 2012). Pre-construction surveys will also be conducted within 30-days prior to construction to ensure that no additional burrowing owls have established territories since the initial surveys. If no burrowing owls are found during any of the surveys, no further mitigation will be necessary. If burrowing owls are found, then the following measures shall be implemented prior to the commencement of construction:
    - During the non-breeding season (September 1 through January 31) burrowing owls should be evicted by passive relocation as described in the Staff Report on Burrowing Owl Mitigations (CDFG 2012). A burrowing owl exclusion plan will be prepared and submitted to CDFW for approval prior to implementation of burrowing owl exclusion or relocation activities.
    - Occupied burrows shall not be disturbed during the nesting season (February 1 through August 31); occupied burrows shall not be disturbed and shall be provided with a 75-meter protective buffer as stipulated in the Staff Report on Burrowing Owl Mitigation (CDFG 2012), unless a qualified biologist approved by CDFW verifies through non-invasive means that either: (1) the birds have not begun egg laying or, (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival.
    - If on-site avoidance is required, the location of the buffer zone will be determined by a CDFW-approved biologist. The developer shall mark the limit of the 75-meter buffer zone with yellow caution tape, stakes, or temporary fencing. The buffer will be maintained throughout the construction period.
    - Where on-site avoidance is not possible, CDFW should be consulted regarding the appropriate avoidance and minimization measures to avoid impacts to this species.
    - Impacts to occupied burrowing owl habitat as defined by CDFW will be mitigated in compliance with the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012) including restoration of temporarily disturbed habitats to pre-project conditions and compensatory mitigation for permanent impacts. A burrowing owl mitigation plan will be prepared and submitted to CDFW for approval prior to commencement of any ground disturbing activities. The plan will describe potential impacts to burrowing owl

resulting from the proposed project and prescribe mitigation measures in accordance with CDFW guidelines.

REGPA PEIR Mitigation Measure BIO-12: Minimize impacts to bald and golden eagle.

Prior to the approval of any solar development projects or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect bald and golden eagles, the project proponent shall implement the following measures to avoid and offset impacts:

- Site specific surveys and monitoring of known or suspected eagle nesting and foraging habitat in areas where eagles occur (i.e., all of California) shall be conducted to provide background information related to bald eagle take permits (golden eagle is fully protected pursuant to Fish and Game Code and no permits may be issued for their take). Surveys shall be conducted using (at least) methods and qualified personnel as recommended by CDFW and USFWS. Surveys shall be conducted according to the USFWS's 2010 *Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations* (available online at http://www.fws.gov/southwest/es/oklahoma/documents/te_species/wind%20power/usfws_interim_goea_monitoring_protocol_10march2010.pdf), the USFWS's 2004 *Protocol for Evaluating Bald Eagle Habitat and Populations in California* and CDFW's 2010 *Bald Eagle Breeding Survey Instructions* (both documents are available online at http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html) or the most recent guidance regarding non-breeding season surveys for winter, migratory, and floating populations of eagles determined in coordination with CDFW and USFWS.

- Where proposed projects may result in take of bald or golden eagles, the USFWS shall be consulted to determine the standards and requirements for the permit titled "Eagle Take – Necessary to Protect Interests in a Particular Locality." Bald Eagle take permits are performance based and will hinge on the merits of the application. The permit application form and related information are on the USFWS website: http://www.fws.gov/migratorybirds/baldeagle.htm. The final rule (Federal Register / Vol. 74, No. 175, September 11, 2009), Environmental Assessment (http://www.fws.gov/migratorybirds/CurrentBirdIssues/BaldEagle/FEA_EagleTakePermit_Final.pdf), implementation and protocol documents, and consultations with USFWS will provide additional guidance.

- Projects shall avoid, to the extent needed to comply with state and federal requirements, siting project facilities and infrastructure in a location or manner that would cause bald and golden eagle mortality, injury, and/or disturbance, i.e., locate facilities outside of eagle breeding home ranges as well as important breeding, wintering, and dispersal foraging areas, migration stopovers and corridors, and areas used by eagles for thermal or orographic lift.

- Projects shall incorporate actions to avoid eagle disturbance (refer to the USFWS National Bald Eagle Management Guidelines, May 2007 and Interim Golden Eagle Technical Guidance: Inventory and Monitoring Protocols; and Other Recommendations in Support of Golden Eagle Management and Permit Issuance, Attachment II) in consultation with the USFWS to obtain the most current guidance and measures.

REGPA PEIR Mitigation Measure BIO-14: Minimize impacts to bighorn sheep.

Prior to the approval of any solar development projects or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect bighorn sheep, the project applicant shall retain a qualified biologist, approved by the USFWS and CDFW, to conduct preconstruction surveys for Sierra Nevada bighorn sheep and/or Peninsular and Mojave bighorn sheep depending on the location of the project. Due to low detection probabilities, the following data shall be used when evaluating potential projects impacts to the species: data relative to historic ranges of bighorn sheep; known and potential wildlife corridors (such as, those identified in the BLM Mojave and Colorado deserts land use plans); point location data; and existing literature. If bighorn sheep or their migration routes exist, are known or likely to occur on or in the vicinity of the project site, and may be affected by project-related activities, the consultation shall be conducted with USFWS, CDFW, and other stakeholders, as appropriate, regarding avoidance, minimization, compensatory mitigation, or site abandonment.

REGPA PEIR Mitigation Measure BIO-17: Minimize impacts to American badger and kit fox.

Appendix U presents the project's Desert Kit Fox and American Badger Management Plan. As outlined in the Plan, prior to the approval of any solar development projects or related infrastructure under the REGPA that is determined during the project level biological resource evaluation (Mitigation Measure BIO-1) to have the potential to affect American badger and/or kit fox, the following measures shall be implemented to avoid, minimize, and mitigate for impacts to these species:

- The project proponent shall prepare and implement an American badger and/or kit fox management plan. The plan shall be prepared in accordance with the most current CDFW guidelines for these species. The plan shall be approved by CDFW prior to implementation. The plan shall include the following components:
    - Preconstruction surveys and mapping efforts: biological monitors shall perform preconstruction surveys for badger and kit fox dens in the project area, including areas within 250 feet of all project facilities, utility corridors, and access roads. If dens are detected, each den shall be classified as inactive, potentially active, or definitely active, including characterization of den type for kit fox (natal, pupping, likely satellite, atypical) per CDFW guidance, and mapped along with major project design elements.
    - Inactive dens that would be directly impacted by construction activities shall be excavated by hand and backfilled to prevent reuse by badgers or kit fox. Excavation and filling activities shall be performed by a CDFW-approved biologist. Potentially and confirmed active dens shall not be disturbed during the whelping/pupping season (February 1 to September 30).
    - Monitoring requirements. Potentially and definitely active dens that would be directly impacted by construction activities shall be monitored by the CDFW-approved biologist for three consecutive nights (during weather conditions favorable for detection) using a tracking medium (such as diatomaceous earth or fire clay) and/or infrared camera stations at the entrance. If no tracks are observed in the tracking medium or no photos of the target species are captured after three nights, the den shall be excavated and

backfilled by hand. If tracks are observed, the den shall be progressively blocked with natural materials (rocks, dirt, sticks, and vegetation piled in front of the entrance) for the next three to five nights to discourage the badger or kit fox from continued use. After verification that the den is unoccupied it shall then be excavated and backfilled by hand to ensure that no badgers or kit fox are trapped in the den.

- Passive relocation strategies. The management plan shall contain, at a minimum, several strategies to passively relocate animals from the site. These methods may involve strategic mowing, fencing, or other feasible construction methods to assist in moving animals offsite toward desirable land. The plan shall address location of preferred offsite movement of animals, based on CDFW data and land ownership. Private Even with permission from the landowner, private land is to be avoided to the maximum extent practicable.

- Escape dens shall be installed along the perimeter fencing to reduce predation risk.

- Kit fox disease prevention measures. The CDFW-approved biologist shall notify the County project manager and CDFW within 24-hours if a dead kit fox is found or appears sick. The plan must also detail a response to a kit fox injury, including a necropsy plan, reporting methods, and scope of adaptive methods in the event of a known or suspected outbreak. The project owner will pay for any necropsy work.

REGPA PEIR Mitigation Measure BIO-18: Minimize impacts to other special status birds, raptors, migratory birds, nesting birds and bats.

The following measures apply to all projects developed under the REGPA that are determined during the project level biological resource evaluation to have the potential to impact nesting birds and/or bats and shall be implemented to avoid, minimize, and mitigate impacts to birds and bats. These measures are for bird species without established protocols and non-listed bird species that lack species-specific mitigation measures (not applicable to the common raven). For future development proposed to be located on or near land with old mines, specific survey protocols and mine closure considerations shall be developed.

Pre-Construction Bird Surveys and Avoidance Measures

If project construction occurs between roughly February 1 and August 31, a CDFW-approved biologist shall conduct preconstruction surveys for nesting birds. The biologist(s) conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques. Surveys shall be conducted in accordance with the following guidelines:

- CDFW and/or USFWS (depending on the avian species in question) shall be contacted to obtain approval of pre-construction survey methodology prior to commencement of the surveys.

- Surveys shall cover all potential nesting habitat in the project site and within 500-feet of the project site and linear facilities boundaries – inaccessible areas outside of the project boundary may be surveyed from within the project site or publicly accessible land with the aid of binoculars.

- Vegetation removal or other ground disturbing activities should be avoided between February 1 and August 31; however if it cannot be avoided, the CDFW-approved avian biologist shall survey breeding/nesting habitat within the survey radius described within one week prior to the start of project activities.

- CDFW and/or USFWS must provide concurrence with the survey findings prior to the start of construction. Site preparation and construction activities may begin after receiving the concurrence and if no breeding/nesting birds are observed. Additional follow up surveys shall be conducted if periods of construction inactivity exceed one week in any given area, an interval during which birds may establish a nesting territory and initiate egg laying and incubation.

If active nests are detected during the survey, a no-disturbance buffer zone (protected area surrounding the nest, the size of which is to be determined by the project biologist in consultation with CDFW and /or USFWS) and a monitoring plan shall be developed. The nesting bird plan shall identify the types of birds that may nest in the project area, the proposed buffers, monitoring requirements, and reporting standards that will be implemented to ensure compliance with the Migratory Bird Treaty Act (MBTA) and Fish and Game Codes 3505 and 3505.3. The CDFW-approved biologist shall monitor the nest until he or she determines that nestlings have fledged and dispersed.

Pre-Construction Bat Surveys and Avoidance Measures

Preconstruction bat surveys shall be conducted by a CDFW-approved biologist(s) familiar with standard bat survey techniques. If night or day roosting bats are identified in project structures they shall not be disturbed and a 100-foot non-disturbance buffer shall be placed between the roost and the construction activities until a determination is made whether the roost is a maternity roost or a non-breeding roost. Maternity colonies shall not be disturbed until coordination with CDFW is conducted to determine appropriate measures including an appropriate no-disturbance buffer. If the CDFW-approved bat biologist determines roosting bats consist of a non-breeding roost, the individuals shall be safely evicted under the direction of a CDFW-approved bat biologist. CDFW shall be notified of any bat evictions within 48-hours.

Bird and Bat Conservation Strategy

A bird and bat conservation strategy (BBCS) shall be prepared to reduce potential project impacts on migratory birds. The BBCS shall describe proposed actions to avoid, minimize, and mitigate adverse effects to migratory birds protected under the Migratory Bird Treaty Act (MBTA) during construction and operations of the proposed project. The BBCS shall be submitted to USFWS and CDFW for approval prior to the start of ground disturbing activities. The BBCS shall address buffer distances for specific bird species and include a robust, systematic monitoring protocol to document mortality and habitat effects to birds. The monitoring protocol should incorporate the following objectives at a minimum: (1) a minimum of weekly monitoring for mortality and immediate necropsy to determine cause of death, both during construction and throughout the life of the project; (2) systematic data collection and reporting of bird mortality including data on the following: species, date, time, how the animal died (e.g., exhaustion, trauma), as well as any information on what might be attracting animals to the photovoltaic cells (light, insects, etc.); (3) a method to estimate the overall annual avian mortality rate associated with the facility, including mortality associated with all the features of the project that are likely to result in injury and mortality (e.g., fences, ponds, solar panels); and, (4) methods to determine whether there is spatial differentiation within the solar field in the rates of mortality (i.e., panels on the

edge of the field versus interior of the field). Biologists performing this work would be required to have a Scientific Collecting Permit from CDFW. Standardized and systematic data on bird and bat mortalities will be collected to contribute to the improvement of the scientific communities' understanding of both baseline and photovoltaic related mortality that occurs in solar projects in the desert and is needed in order to identify improved methods to minimize adverse effects on migrating birds and bats.
In the absence of a permit from the USFWS, the temporary or permanent possession of protected migratory birds and their carcasses is a violation of the MBTA. Because of the need for carcass collection to adequately monitor avian impacts during BBCS implementation and to reduce the food subsidy that carcasses may provide to common ravens (*Corvus corax*) and other predators, developers shall be required to obtain a special purpose utility permit from the USFWS allowing the collection of migratory birds and/or their carcasses prior to implementation of the monitoring protocol.

General Bird Mortality Avoidance Measures

The following measures are recommended by the USFWS Forensics Laboratory and shall be implemented to minimize bird mortality from birds attracted to solar facilities:

- All potential nesting vegetation (e.g., trees, shrubs) shall be removed within the fenced area of the facility to decrease attractive habitat.

- The most current science regarding visual cues to birds that the solar panel is a solid structure shall be implemented. This may include but is not limited to UV-reflective or solid, contrasting bands spaced no further than 28 centimeters from each other. An adaptive management approach for reducing bird collisions with solar panels shall be implemented in coordination with the USFWS so that measures used are systematically tested and modified as appropriate. This may include but is not limited to UV-reflective or solid, contrasting bands spaced no further than 28-centimeters from each other.

- Projects with documented avian mortality shall work with the USFWS to conduct additional research to test measures for reducing avian mortality. Such measures could include, but are not limited to, experimental lighting within the solar field and use of detection and deterrent technologies.

- Developers of power tower operations shall implement adaptive management in consultation with the USFWS should mortality monitoring indicate that suspension of power tower operations during certain periods is necessary to reduce impacts on local or regional bird populations. Such measures may include, but are not limited to, suspending or reducing project operations during peak migration seasons.

- Vertical orientation of mirrors shall be avoided whenever possible (for example, mirrors shall be tilted during washing).

- Perch deterrent devices shall be placed on tower railings.

- Exclusionary measures shall be employed to prevent bats from roosting in and around the facility.

Avoid Impacts from Electric Lines and Lights

The following design measures shall be implemented for applicable projects to minimize impacts to bats and birds:

- Transmission lines and electrical components shall be installed and maintained in accordance with the Avian Power Line Interaction Committee's (APLIC) *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* (APLIC 2006) or the most recent guidance to reduce the likelihood of electrocutions of raptors and other large birds.

- Transmission lines and electrical components shall be installed and maintained in accordance with the APLIC's *Reducing Avian Collisions with Power Lines: The State of the Art in 2012* (Edison Electric Institute and APLIC 2012) or the most recent guidance to reduce the likelihood of bird collisions.

- Low and medium voltage connecting power lines shall be placed underground, if feasible. If burial of the lines is not feasible due to cost or other logistical reasons (for example in shallow bedrock areas) or may cause unacceptable impacts to biological habitats and their dependent species, overhead lines may be installed in compliance with the following requirements:

    - low and medium voltage overhead lines shall be sited away from high bird crossing locations, such as between roosting and feeding areas or between lakes, rivers, and nesting areas; and/or

    - low and medium voltage overhead lines shall be installed parallel to tree lines or be otherwise screened so that collision risk is reduced.

- Permanent communication towers and permanent meteorological towers shall not be constructed with guy wires, if feasible. If guy wires are necessary for permanent or temporary towers, bird flight diverters or high visibility marking devices shall be used. In such cases a monitoring plan shall be developed and carried out to determine the diverters'/devices' effectiveness in reducing bird and bat mortality.

- Facility lighting shall be installed and maintained to prevent upward and side casting of light towards wildlife habitat and motion sensors shall be used. If the FAA requires turbine or tower lighting to alert aircraft, red or white strobe lights shall be used on the structures to minimize avian collision risks. The strobes shall be on for as brief of a period as possible and the time between strobe or flashes shall be the longest allowable. Strobes shall be synchronized so that a strobe effect is achieved and towers are not constantly illuminated.

- Lights with sensors and switches shall be used to keep lights off when not required.

- The use of high-intensity lighting, steady-burning, or bright lights such as sodium vapor or spotlights shall be minimized.

Compensatory Mitigation for the Cumulative Loss of Migratory Bird Habitat along the Pacific Flyway

The County shall require solar development projects implemented under the REGPA to mitigate for the loss of habitat by funding activities to restore, enhance, or conserve important habitat for migratory birds or to remove other mortality sources from the Pacific Flyway. Such funding may be directed to the Sonoran Joint Venture (http://sonoranjv.org), Central Valley Joint Venture (http://www.centralvalleyjointventure.org), or Intermountain West Joint Venture (http://iwjv.org), or other groups able to implement conservation of migratory birds within the Pacific Flyway. The amount of funding will be determined by the County in coordination with USFWS and shall be commensurate with the level of impact.

REGPA PEIR Mitigation Measure BIO-19: Minimize impacts to special status natural communities and protected natural areas.

Solar development authorized under the REGPA will not be sited within any special status natural communities or protected natural areas. If solar development is sited adjacent to any special status natural communities or protected natural areas or is determined to have the potential to impact any off-site special status natural communities or protected natural areas during the project level biological resources evaluation (e.g., projects in the Laws SEDA could impact the hydrology of critical habitat for Fish Slough milk-vetch; projects in the Chicago Valley SEDA could negatively impact off-site mesquite bosque by altering drainage patterns or altering groundwater levels; projects in the Charleston View and Chicago Valley SEDAs could impact down-watershed habitats in the Amargosa Watershed (including habitats within the portion of the Amargosa River that has been designated by Congress as “Wild and Scenic.”), a management plan will be developed in consultation with CDFW and/or USFWS. The management plan will address the potential offsite effects of the construction and on-going operations of the facility on special status species including but not limited to the effects of human disturbance, noise, nighttime maintenance activities, increased lighting, increased traffic on desert roads, and barriers to movement for special status species. The management plan will also address potential mechanisms of offsite habitat degradation such as introduction of invasive weeds, introduction or attraction of feral animals or other species attracted to areas with anthropogenic disturbance, hydrologic disruption due to groundwater impacts or alteration of surface drainage patterns, and increased risk of wildfires. The management plan will also outline the specific measures to be undertaken to avoid and/or minimize indirect effects of the solar development on the adjacent sensitive habitat and special status species and include a plan for long term monitoring of the adjacent habitat as well as an adaptive management plan.

If riparian communities (other than water birch riparian scrub which is a special status natural community that must be avoided) are present in a project area, impacts to riparian communities shall be avoided or minimized by implementing the following measures:

- The project shall be redesigned or modified to avoid direct and indirect impacts on riparian communities, if feasible.
- Riparian communities adjacent to the project site shall be protected by installing environmentally sensitive area fencing, if necessary, in coordination with the project biologist.
- The potential for long-term loss of riparian vegetation shall be minimized by trimming vegetation rather than removing the entire shrub. Shrub vegetation shall be cut at least 1 foot

above ground level to leave the root systems intact and allow for more rapid regeneration of the species. Cutting shall be limited to a minimum area necessary within the construction zone. This type of removal shall be allowed only for shrub species (all trees shall be avoided) in areas that do not provide habitat for special status species (e.g., willow flycatcher).

- If riparian vegetation is removed as part of a project, the loss of riparian vegetation shall be mitigated to ensure no net loss of habitat functions and values. Compensation ratios shall be based on site-specific information and determined through coordination with state and federal agencies (including CDFW and USFWS). Compensation shall be provided at a minimum 1:1 ratio (1 acre restored or created for every 1 acre removed) and may be a combination of on-site restoration/creation, off-site restoration, or mitigation credits. A restoration and monitoring plan shall be developed and implemented that describes how riparian habitat shall be enhanced or recreated and monitored over a minimum period of time, as determined by the appropriate state and federal agencies.

REGPA PEIR Mitigation Measure BIO-20: Minimize impacts to waters of the US/State, including wetlands.

The following measures apply to all projects developed under the REGPA that are determined during the project level biological resource evaluation to have the potential to impact waters of the US or waters of the State, including wetlands, and shall be implemented to avoid, minimize, and mitigate for such impacts. These measures shall be incorporated into contract specifications and implemented by the construction contractor. In addition, the project proponent shall ensure that the contractor incorporates all state and federal permit conditions into construction specifications.

- Wetlands and other waters of the US/state shall be delineated on the project site using both USACE and CDFW definitions of wetlands. USACE jurisdictional wetlands shall be delineated using the methods outlined in the USACE 1987 Wetlands Delineation Manual and the Arid West Manual, or the most recent guidance. This information shall be mapped and documented as part of the CEQA documentation, as applicable, and in wetland delineation reports. All applicable permits shall be obtained prior to impacting waters of the US/State including CWA Section 404 and 401 permits from the USACE and the RWQCB respectively and a Streambed Alteration Agreement from CDFW.

- The project shall be redesigned or modified to avoid direct and indirect impacts on waters of the U.S./State, if feasible.

- Standard erosion control measures shall be implemented for both regions of construction and operation where sediment runoff from exposed slopes threatens to enter waters of the State and/or waters of the US. Sediment and other flow-restricting materials shall be moved to a location where they shall not be washed back into the stream. All disturbed soils and roads within the project site shall be stabilized to reduce erosion potential, both during and following construction. Areas of disturbed soils (access and staging areas) with slopes trending towards a drainage shall be stabilized to reduce erosion potential.

- Wetland habitats that occur near the project site shall be protected by installing environmentally sensitive area fencing if necessary, in coordination with the project biologist.

- All construction vehicles and equipment shall use existing roadways to the extent feasible to avoid or reduce impacts to waters of the U.S./State.

- Installation activities shall be avoided in saturated or ponded wetlands during the wet season (spring and winter) to the maximum extent possible. Where such activities are unavoidable, protective practices, such as use of padding or vehicles with balloon tires, shall be used.

- Where determined necessary by resource specialists, geotextile cushions and other materials (e.g., timber pads, prefabricated equipment pads, or geotextile fabric) shall be used in saturated conditions to minimize damage to the substrate and vegetation.

- Exposed slopes and stream banks shall be stabilized immediately on completion of installation activities. Other waters of the US shall be restored in a manner that encourages vegetation to reestablish to its pre-project condition and reduces the effects of erosion on the drainage system.

- In highly erodible stream systems, banks shall be stabilized using a non-vegetative material that will bind the soil initially and break down within a few years. If the project engineers determine that more aggressive erosion control treatments are needed, geotextile mats, excelsior blankets, or other soil stabilization products shall be used.

- During construction, trees, shrubs, debris, or soils that are inadvertently deposited below the ordinary high-water mark of drainages shall be removed in a manner that minimizes disturbance of the drainage bed and bank.

- If wetlands are filled or disturbed as part of the highway solar project, compensation will be implemented for the loss of wetland habitat to ensure no net loss of habitat functions and values. Compensation ratios shall be based on site-specific information and determined through coordination with state and federal agencies (including CDFW, USFWS, and USACE). The compensation shall be at a minimum 1:1 ratio (1-acre restored or created for every 1-acre filled) and may be a combination of on-site restoration/creation, off-site restoration, or mitigation credits. A restoration and monitoring plan shall be developed and implemented if on-site or offsite restoration or creation is chosen. The plan shall describe how wetlands shall be created and monitored for the duration established by the regulatory agency.

- For solar projects proposing groundwater pumping, hydrological studies shall be performed to assess the potential for off-site impacts to jurisdictional waters that depend on groundwater. Projects shall be designed to avoid and/or minimize impacts to groundwater-dependent jurisdictional resources off-site, and all proposed impacts to such resources shall be reviewed by the agencies with jurisdiction over the affected resources and mitigated according to those agencies' requirements.

REGPA PEIR MM BIO-21: Minimize impacts to movement or migratory corridors or native wildlife nursery sites.

The following mitigation measures will be implemented to minimize impacts to movement or migratory corridors or native wildlife nursery sites:

- Solar development authorized under the REGPA shall not be sited in or within 1,000-feet of any areas determined by the County in consultation with responsible and trustee agencies to be Important Bird Areas, essential connectivity areas or linkages identified in the 2001 Missing Links in California's Landscape Project (Penrod et al. 2001), or tule elk and mule deer movement corridors unless potentially significant impacts are avoided. The appropriate buffer distance shall be determined on a project-by-project basis as determined by the County in consultation with responsible and trustee agencies.

- Any proposed solar development projects in the OVSA shall be required to study the potential impact of the project on tule elk and mule deer movement corridors prior to project approval. If a proposed project is determined to be located within an important tule elk and mule deer movement corridor, the applicant shall be responsible for the preparation of a plan to avoid and/or minimize impacts to such corridors in coordination with CDFW.

- As stated in Mitigation Measure BIO-6, projects shall not be sited within areas identified for desert tortoise recovery or conservation according to the Draft Revised Recovery Plan for the Mojave Population of the Desert Tortoise (USFWS 2011) (such as designated critical habitat, ACECs, DWMAs, priority connectivity areas, and other areas or easements managed for desert tortoises).

REGPA PEIR MM BIO-22: Minimize spread of invasive plant species or noxious weeds.

For projects implemented under the REGPA that are determined during the project level biological resource evaluation to have the potential to result in the spread of invasive plant species or noxious weeds, the following mitigation measures shall be implemented:

To prevent the introduction and spread of noxious weeds, a project-specific integrated weed management plan has been developed for approval by the permitting agencies. A draft Habitat Restoration, Revegetation, and Weed Management Plan has been prepared and included as Appendix T. The plan shall include the following measures, at a minimum, to prevent the establishment, spread, and propagation of noxious weeds:

- The area of vegetation and/or ground disturbance shall be limited to the absolute minimum and motorized ingress and egress shall be limited to defined routes.

- Project vehicles shall be stored on-site in designated areas to minimize the need for multiple washings of vehicles that re-enter the project site.

- Vehicle wash and inspection stations shall be maintained on-site and the types of materials brought onto the site shall be closely monitored.

- The tires and undercarriage of vehicles entering or reentering the project site shall be thoroughly cleaned.

- Native vegetation shall be re-established quickly on disturbed sites.

- Weed Monitor and quickly implement control measures to ensure early detection and eradication of weed invasions.

- Use certified weed-free straw, hay bales, or equivalent for sediment barrier installations.

V. CULTURAL RESOURCES

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5 and PRC Section 21083.2?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5 and PRC Section 21083.2?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries (State CEQA Guidelines Section 15064.5[d])?	☐	☐	☐	☒

A Non-Confidential Cultural Resources Assessment (CRA) was prepared by ERM on October 15, 2026, and is incorporated and included as Appendix H to this IS/Addendum. A Paleontological Resources Assessment (PRA) was prepared by ERM on November 25, 2025, and is incorporated and included as Appendix I to this IS/Addendum.

Environmental Setting

The proposed project is situated within the southern portion of the Basin and Range Geomorphic Province, characterized by a series of angular, approximately parallel, fault-bounded mountain ranges separated by desert basins characteristic of the horst and graben structure (California Geological Survey 2002; Eaton 1982; Norris and Webb 1990; Parsons 2006; Stewart 1980). This horst and graben fault block pattern resulted from crustal extension and faulting caused by subduction of the Farallon Plate and rotation along the San Andreas Fault beginning approximately 30 million years ago in the early Oligocene and continuing to approximately 10 million years ago in the late Miocene (Cohen et al. 2013; Norris and Webb 1990; Parsons 2006).

In the Pliocene (approximately 2.58 to 5.33 million years ago), erosion, flash floods, steep mountain slopes, and deep basins were common features of the arid or semiarid Basin and Range Geomorphic Province (Cohen et al. 2013; Norris and Webb 1990). During periods of glaciation in the Pleistocene (with glacial advances estimated from approximately 14,500 to 28,000 in the Western United States), glaciers were likely only present along mountain summits in this province, but climates were cool and dry, with less evaporation than today, resulting in permanent drainages and lakes in basins (Hughes et al. 2013; Norris and Webb 1990). Mountain ranges in the province are flanked by plateaus formed by alluvial fan and axial valley drainage deposits with varying amounts of eolian (windblown sand) deposits (Schmidt and McMackin 2006). Alluvial fans are formed from single-thread channels exiting higher gradient bedrock areas and discharging water and sediment into basins (Schmidt and McMackin 2006). Axial valley drainages are generally located at topographically lower portions of a valley, flow for longer

distances, and deposit sediment from numerous sources (Schmidt and McMackin 2006). Eolian deposits mobilize sediment typically in areas with little to no vegetation and commonly grade into distal portions of alluvial fan deposits as sand sheets with small dunes and vegetation mounds (Schmidt and McMackin 2006). Topographically flattened, fine-grained playa deposits form in areas of groundwater discharge and widespread low-energy flooding (Schmidt and McMackin 2006). The project lies within the Pahrump Valley, a broad, internally drained basin flanked by the Spring Mountains to the east and the Kingston Range to the west (DWR 2003).

Cultural Setting

The study area, which includes the 2,400-acre project site and a 200-foot buffer zone following along the northern and eastern boundary of the project site, the gen-tie corridor, and the access road corridor, lies within the Great Basin, a large contiguous area comprised of internally draining watersheds and characterized by basin and range topography (Grayson 2011). The region encompasses Nevada, Utah, and portions of Colorado, Idaho, Oregon, and eastern California (Grayson 2011; d'Azevedo 1978). In addition to its natural definitions, such as hydrographic, botanic, or physiographic boundaries, anthropologists also use the term Great Basin to describe a cultural region, one defined by shared lifeways, subsistence strategies, and material culture traditionally practiced by groups across the region (Grayson 2011).

The chronological framework of the Great Basin is divided into cultural stages characterized by such adaptive strategies (Elston 1986). Precontact archaeological sequences in the western Great Basin consist of the Paleoarchaic period and the Archaic period, which is further divided into three distinct phases: Early Archaic, Middle Archaic, and Late Archaic. More nuanced cultural complexes incorporate region specific models that may focus on specific patterns of change through time, often defined by projectile point types, like those developed for the Mojave Desert region (Bettinger and Taylor 1974; Gardner 2005; Giambastiani et al. 2005; Gilreath and Hildebrandt 1997; Sutton et al. 2007; Sutton 2023; Warren 1984; Warren and Crab Tree 1986). Archaeologists frequently define these periods with reference to geologic time periods, e.g., Late Pleistocene or Middle Holocene and/or with reference to other cultural complexes.

Methodology

Background Research

On December 26, 2024, ERM requested a confidential California Historical Resources Information System (CHRIS) records search from the Southern San Joaquin Valley Information Center (SSJVIC) to identify previously documented cultural resources and cultural resource studies within a 0.5-mile radius of the 3,382-acre project area. A supplemental request for a CHRIS records search was submitted to the SSJVIC on February 11, 2025, to encompass the 32.6-acre portion of the previously proposed access road corridor that extends beyond the study area, connecting the project to Old Spanish Trail.

The background research also involved a comprehensive review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Points of Historical Interest list, the Cultural Heritage List (CHL) list, and the California Historical Resources list. In addition, ERM analyzed historical aerial imagery in conjunction with historical USGS 7.5-minute quadrangle maps for Mound Spring, Calvada Springs, Stump Spring, as well as 15-minute quadrangle maps for Pahrump and Horse Thief Springs. This review included documenting modifications to the topographical setting

and identifying distinguishable natural or artificial features that could potentially indicate the presence of cultural resources.

NAHC Consultation

As the REGPA PEIR was certified prior to implementation of tribal consultation under CEQA (formerly referred to as AB 52), therefore the required Tribal consultation for this project has been conducted under Senate Bill (SB) 18. On August 27, 2024, Inyo County initiated Tribal consultation by mailing letters offering an opportunity to consult on proposed renewable energy projects county-wide to one or more representatives of the following Tribes:

- Big Pine Paiute Tribe of the Owens Valley
- Bishop Paiute Tribe
- Cabazon Band of the Mission Indians
- Fort Independence Indian Community of Paiutes
- Kern Valley Indian Community
- Lone Pine Paiute-Shoshone Tribe
- Timbisha Shoshone Tribe
- Torez Martinez Desert Cahuila Indians
- Twenty-Nine Palms Band of Mission Indians

Twenty-Nine Palms Band of Mission Indians was identified as culturally affiliated and contacted in regard to this project.

On December 26, 2024, ERM submitted a supplemental Sacred Lands File (SLF) request to the NAHC via email. The request commenced a search for known Native American resources and the contact information of Native American groups or individuals with cultural affiliation to the 3,382-acre project area and the 32.6-acre portion of the previously proposed access road corridor that extends beyond the study area.

Fieldwork

The methodology for fieldwork is determined by the specific types and characteristics of the resources common to the geographical region. The scope of the Phase I survey efforts included identifying and documenting cultural resources within the study area that exceeds 45-years in age and evaluating newly discovered resources for historical significance based on criteria for listing in the CRHR. Modern land surface conditions, the landform context, and existing geomorphic data within all areas with planned disturbance were assessed for the potential of subsurface cultural deposits.

An intensive pedestrian survey of the study area was conducted in two separate field sessions under the direction of Anthony H. Morales. The first field session occurred from March 4 through 12, 2025, and the second field session from April 1 through 4, 2025. The survey methodology consisted of transect intervals spaced no greater than 15-meters apart, with no portion of the study area excluded from pedestrian investigations. Considerations were made regarding depositional context and the extent of modern disturbances, providing an integrated evaluation of the potential for subsurface preservation. A

survey of the 0.25-mile stretch of Zircon Street, which will have gravel placed upon it, is not required as all proposed ground disturbances will be within the established road.

Cultural resources were documented with iPads using the ArcGIS Field Maps application connected to a Juniper Geode Global Navigation Satellite System (GNSS) receiver, providing sub-meter accuracy for recordation. The Universal Transverse Mercator (UTM) location of artifacts, features, and isolated resources were documented as single points. Archaeological sites were recorded in more detail, incorporating individual points as well as the site boundaries and intra-site concentrations or features as needed. Detailed photographs of cultural materials and overviews of sites were documented using a digital camera with iPad photographs serving as a supplementary backup. Standardized paper forms supplemented the collection of these data. ERM archaeologists did not collect any artifacts.

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.5, *Cultural Resources*, of the REGPA PEIR, although Mitigation Measure CUL-1, Mitigation Measures CUL-1a through CUL-1g, and Mitigation Measure CUL-2 will be applied to reduce cultural resources impacts, the impacts to cultural resources would remain significant and unmitigable, as it is not possible to know precisely the location, extent, and particular characteristics of impacts to these resources at the programmatic level of analysis.

For paleontological resources, Mitigation Measure PALEO-1 would reduce the impacts related to ground disturbance and excavation during construction as well as the indirect effect of increased public access to paleontological resources by requiring appropriate collection and salvage of any important paleontological resources. With implementation of the mitigation measure, impacts to paleontological resources would be reduced to less than significant at the programmatic level of analysis.

Discussion of Project Impacts

a) Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5 and PRC Section 21083.2?

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5 and PRC Section 21083.2?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that construction of solar facilities could potentially affect historical resources, cultural landscapes, and archaeological resources when excavations and other activities alter the existing surface. Substantial adverse changes in the existence of a recognized cultural landscape would result in a potentially significant impact. Additionally, substantial adverse changes to a historical resources or an archaeological resources, as defined in Section 15064.5 of the CEQA Guidelines would have a potentially significant impact.

Impacts from the Proposed Project

A Non-Confidential CRA was prepared for the proposed project (included as Appendix H).

Records Search Results

As discussed in the CRA, on January 21 and February 17, 2025, ERM received the confidential CHRIS records search results from the SSJVIC. The search identified four previously conducted cultural resource studies within a 0.5-mile radius of both the project area and the previously proposed access road corridor, three of which intersect the study area (Table 6). Six previously recorded resources were also identified within the same radius, four of which are located within the study area (Table 7). All previously recorded resources within the study area are found within the 2,400-acre project site and not located within the gen-tie corridor or the previously proposed access road corridor.

Table 6: Previous Cultural Resources Studies within a 0.5-Mile Radius of the Project Area and Access Road Corridor

Report Number	Title	Year	Author
IN-00053	Deteriorated Pole Replace. Project, Arch. Survey of Eight Pole Locations on the Color 4 kilovolts (kV) Desolate 12kV, Earth 12kv, Lockhart 33kv, Nipton 33 kV, Police 12kV, And Potosi 25kV T/L, San Bernardino County, and the Pahrump 25kV T/L Inyo County, California.	2005	Pollock, Kathleen, and Kathleen Hull
IN-00069*	Archaeological Survey of the Hidden Hills Ranch Project Site, Inyo County, California.	1979	Breece, William H., and A. Schilz
IN-00938*	Archaeological Survey Report for Southern California Edison's Interset Pole Project on the Pahrump 25 kV Circuit North of Highway 16, Inyo County, California, and Clark County, Nevada.	2010	Heidelberg, Kurt
IN-00967*	Historic Trails and Roads Technical Study; Hidden Hills Solar Electric Generating System.	2012	Lawson, Natalie, and W. Geoffrey Spaulding

*Previous studies that intersect the study area

Table 7: Previously Recorded Cultural Resources within a 0.5-Mile Radius of the Project Area and Access Road Corridor

Resource Number / Primary Number	Age	Site Description	CRHR/NRHP Eligibility
P-14-002492 / CA-INY-2492	Precontact	Lithic scatter of two chert or chalcedony cores and numerous flakes	Not Evaluated
P-14-011677 / CA-INY-10323H*	Historic	Historic road segment connecting the old Nevada State Route 16 to the Tecopa Pass Road	Recommended not eligible
P-14-011678 / CA-INY-10322*	Precontact	Single, ephemeral trail or footpath that measures approximately 35 to 40 centimeters wide, possibly precontact	Recommended not eligible
P-14-011679 / CA-INY-10320H*	Historic	Narrow historic road parallel to the California-Nevada border	Recommended not eligible
P-14-011680 / CA-INY-10321H	Historic	Historic track on the south side of Tecopa Road	Not evaluated

P-14-011681 / CA-INY-010370H*	Historic	Shallow graded historic road connecting Hidden Hills Ranch to Sandy Valley	Recommended not eligible

*Previously recorded resources that intersect the study area

In addition to the CHRIS records search, the review of the NRHP, the CRHR, the California Points of Historical Interest list, the CHL, and relevant historical maps and aerial imagery did not indicate the presence of previously known or unknown cultural resources within the project area or its immediate vicinity.

NAHC Results

Tribal consultation under SB 18 was initially conducted by Inyo County in connection with its renewable energy development plans as part of the REGPA PEIR. In response to the letters mailed pursuant to AB 52, on August 27, 2024, one Tribe, the Twenty-Nine Palms Band of Mission Indians, requested formal consultation. As part of the consultation process, Inyo County staff have made four attempts to coordinate with the Twenty-Nine Palms Band of Mission Indians' request and have not received a response in return. No other Tribes requested consultation. The County considers tribal consultation to be complete. On December 31, 2025, ERM received a response from the Native American Heritage Commission (NAHC) to the supplemental SLF search request associated with the Project. The NAHC reported negative results for Tribal Cultural Resources or areas of traditional or cultural significance to the Tribe and provided a list of Tribes culturally affiliated with the project area.

Field Survey Results

ERM's archaeologists surveyed the entire study area. The Phase I fieldwork resulted in the documentation of 90 newly identified cultural resources, including 65 isolated artifacts and 25 archaeological sites (Table 8). In addition, site visits were conducted to the four previously recorded resources located within the study area. Documentation for the recordation of each includes California Department of Parks and Recreation (DPR) Series 523 forms, along with maps. Updated records reflecting current site conditions have been prepared for the four previously recorded sites.

The 25 archaeological sites and eligibility recommendations for listing in the CRHR are outlined below in Table 8, *Newly Recorded Sites within the Study Area*.

Table 8: Newly Recorded Sites within the Study Area

Resource Number	Age	Resource Description	NRHP/CRHR Eligibility Status	Proposed Mitigation Measures
ERM-2025-INY-S-001	Multicomponent	Precontact artifact scatter; Historic features and refuse scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-002	Precontact	Artifact Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-003	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-004	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-005	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable

Resource Number	Age	Resource Description	NRHP/CRHR Eligibility Status	Proposed Mitigation Measures
ERM-2025-INY-S-006	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-007	Multicomponent	Precontact Lithic Scatter; Historic Refuse Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-008	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-009	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-010	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-011	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-012	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-013	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-014	Precontact	Artifact Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-015	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-016	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-017	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-018	Indeterminate	Feature of unknown age	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-019	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-020	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-021	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-022	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-023	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-024	Precontact	Lithic Scatter	Not Evaluated	MM-CR-1 though MMCR-8 as applicable
ERM-2025-INY-S-025	Historic	Refuse Scatter	Recommended Not Eligible	Preservation in place is preferred (MM-CR- 1)

Notes: CRHR = California Register of Historical Resources; NRHP = National Register of Historic Places

Of the 25 newly identified sites listed under Table 8, one site, ERM-2025-INY-S-025, is recommended as not eligible for listing in the CRHR. As the remaining 24 newly documented sites would be considered potentially significant, REGPA PEIR Mitigation Measure CUL-1a, which requires cultural resources staff to be designated and retained, REGPA PEIR Mitigation Measure CUL-1b, which requires preparation of a Historical Resources Treatment Plan, REGPA PEIR Mitigation Measure CUL-1c, which requires preparation of a Monitoring and Treatment Plan, REGPA PEIR Mitigation Measure CUL-1d, which grants

authority to halt project activities, REGPA PEIR Mitigation Measure CUL-1e, which requires cultural resources WEAP training, REGPA PEIR Mitigation CUL-1f, which requires cultural resources reporting, and REGPA PEIR Mitigation Measure CUL-1g, which requires proper curation of cultural resources collections, would be implemented to reduce impacts to these documented sites to a less than significant level.

Therefore, with implementation of REGPA PEIR Mitigation Measures CUL-1a through CUL-1g, potential impacts for questions a) and b) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR determined that construction of solar facilities as part of the REGPA could potentially destroy paleontological resources or unique geologic features primarily during the excavation and earth-moving activities during construction. The REGPA PEIR went on to determine that construction and operational activities associated with the REGPA could indirectly impact paleontological resources via hydrologic effects and increased public access, and that there would be a potentially significant impact to paleontological resources. However, Mitigation Measure PALEO-1, which requires protection of paleontological resources, would be implemented. With implementation of Mitigation Measure PALEO-1, impacts to paleontological resources would be less than significant.

Impacts from the Proposed Project

A PRA was prepared by ERM for the proposed project. The PRA evaluated the potential for the proposed project to result in significant impacts to paleontological resources and provided recommendations to reduce such impacts to less-than-significant levels. The PRA included a review of published geologic maps, scientific literature and online fossil locality databases, geotechnical assessment for the Project, and museum records, as well as a pedestrian reconnaissance survey. The pedestrian survey conducted as part of the PRA determined that the surface of the project site is mapped as intermittently active fluvial fine-grained alluvium, youngest alluvium, older fine-grained deposits, active valley-axis deposit intermixed with young valley-axis deposit, young alluvium, older young alluvium, undivided alluvium, young eolian sand deposit overlying intermediate valley-axis deposit, young eolian sand deposit overlying intermediate groundwater discharge deposit, young mixed alluvial and eolian deposit overlying intermediate valley-axis deposit, and young mixed alluvial and eolian sand deposit overlying intermediate groundwater deposit. No paleontological resources were identified during the survey.

The PRA determined that while these surficial units have no or low paleontological sensitivity, they are underlain by sediments capable of preserving paleontological resources at approximately 4-feet-below ground surface (bgs) based on subsurface geologic information and regional fossil databases. Therefore, the PRA concluded that ground-disturbing activities associated with the project with the potential to impact previously undisturbed sediments at depths 4-feet-bgs or greater could result in potentially significant impacts to “unique” paleontological resources, and recommended implementation of REGPA PEIR Mitigation Measure PALEO-1. REGPA PEIR Mitigation Measure PALEO-1 requires the preparation of a PRA report and, if recommended by the PRA, a Paleontological Resources Management Plan.

With implementation of REGPA PEIR Mitigation Measure PALEO-1, potential impacts to paleontological resources would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

d) Disturb any human remains, including those interred outside of formal cemeteries?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the potential also exists for the construction of solar facilities to lead to the inadvertent uncovering or damaging of unknown buried human remains or cultural items, including associated funerary objects, sacred objects, and objects of cultural patrimony, which are typically unmarked. Mitigation Measure CUL-2, which requires implementation of proper actions in the event of the incidental discovery of human remains, would be implemented. Although Mitigation Measure CUL-2 will be applied to reduce potential impacts from discovery of human remains, the impact would remain significant and unmitigable, as it is not possible to know precisely the location, extent, and particular characteristics of impacts to these resources at the programmatic level of analysis.

Impacts from the Proposed Project

A Non-Confidential CRA was prepared by ERM for the proposed project. The CRA concluded that if human remains are unexpectedly encountered during any project activities, all work in the immediate area shall be suspended, and the County Coroner shall be notified within 24-hours, pursuant to Section 7050.5 of the California Health and Safety Code. Should the remains be determined to be Native American, the Coroner will notify the NAHC, which will initiate consultation with the Most Likely Descendant (MLD) in accordance with PRC Section 5097.98 to determine appropriate treatment and disposition. These procedures for the discovery of humans remains are outlined in REGPA PEIR Mitigation Measure CUL-2, which require proper actions in the event of the incidental discovery of human remains.

With implementation of REGPA PEIR Mitigation Measure CUL-2, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures from the REGPA PEIR

The following Mitigation Measures from the REGPA PEIR are applicable to the proposed project, as indicated in the discussion above.

REGPA PEIR MM CUL-1a: Designate project cultural resources staff.

<u>Project Cultural Resources Specialist</u>. Prior to the approval of a Renewable Energy Permit, Renewable Energy Development Agreement, or Renewable Energy Impact Determination by the County Planning Department, a cultural resources specialist whose training and background conforms to the US Secretary of Interior's Professional Qualifications Standards, as published in Code of Federal Regulations Title 36, part 61 shall be retained by the project owner to conduct a cultural resources inventory, evaluate any resources, produce a Cultural Resources Management and Treatment Plan and

other related plans for the approved project and to implement any required plans and mitigation, as necessary as determined by the cultural resource specialist.

Their qualifications shall be appropriate to the needs of the project and shall include local knowledge. If the project primarily impacts resources archaeological in nature, the cultural resources specialist shall have a background in archaeology, anthropology or cultural resource management. If the project impacts primarily built environment resources, the cultural resources specialist shall have a background in architectural history. Resumes of the proposed cultural resources staff shall be submitted to the County Planning Department or other CEQA lead agency for review and approval. The Monitoring and Treatment Plan (Mitigation Measure CUL-1c) shall be prepared and implemented under the direction of the cultural resources specialist and shall address and incorporate CUL-1a through CUL-1g.

Additional Cultural Resources Staff. The project's cultural resources specialist may obtain the services of specialists, cultural resources monitors and field crew if needed, to assist in identification, evaluation, mitigation, monitoring, and curation activities. Cultural resources staff shall have a Bachelor's degree in anthropology, archaeology, history, architectural history or related field, and demonstrated field experience. These individuals must also meet local lead agency qualifications, and their resumes must be reviewed and approved by local lead agency staff prior to beginning work.

REGPA PEIR MM CUL-1b: Draft a Historical Resources Treatment Plan.

To mitigate the potential impacts on historical resources identified during inventory of the project area, a treatment plan for historical resources shall be developed by, depending on the nature of the resources identified, an archaeologist and/or architectural historian who meets the Secretary of Interior's Professional Qualifications Standards. This treatment plan would include data recovery plans that would address NRHP/CRHR-eligible cultural resources that would be impacted by the project by requiring some level of extracting the scientific value and analysis of the resources prior to development.

REGPA PEIR MM CUL-1c: Draft a Monitoring and Treatment Plan.

To mitigate the potential impacts related to inadvertent discovery of archaeological resources during construction, the project proponents shall have a Secretary of the Interior-qualified archaeologist implement a monitoring program and an unanticipated archaeological resource treatment plan. The qualified archaeologist will evaluate any resources uncovered during ground disturbing activities implement appropriate treatment as specified in the archaeological resource treatment plan. During all activities related to the project that include ground disturbance, these ground- disturbing activities will be observed by an archaeological monitor, as determined necessary by the archaeologist.

- If, during the course of monitoring, a potentially significant resource is discovered, the qualified archaeologist will have the authority to stop or redirect ground disturbing activities away from the resource until it can be evaluated.

- If previously unknown cultural deposits are discovered during the course of construction, such as previously undiscovered stratified cultural deposits, a testing program will be implemented to evaluate the stratified cultural deposit.

- A separate Native American monitor shall be retained by the project proponent to monitor ground disturbing activities in and around archaeological resources. The Native American monitor shall be selected through consultation with Native American tribal groups. The Native American monitor shall work in conjunction with the qualified archaeologist.

REGPA PEIR MM CUL-1d: Grant authority to halt project activities.

Prior to the approval of a Renewable Energy Permit, Renewable Energy Development Agreement, or Renewable Energy Impact Determination by the County or the relevant CEQA lead agency, the project owner shall submit a written document granting authority to halt project related activities to the project's cultural resources specialist (as defined in Mitigation Measure CUL-1a) and cultural resources monitors in the event of a discovery or possible damage to a cultural resource. Redirection of project related activities shall be accomplished under the direction of the project supervisor in consultation with the cultural resources specialist. The details of this agreement shall be stipulated in the Cultural Resources Management and Treatment Plan as required in Mitigation Measure CUL-1b.

REGPA PEIR MM CUL-1e: Develop a Cultural Resources Worker Environmental Awareness Program.

Prior to and for the duration of project activities, the project owner shall provide WEAP training to all new workers within their first week of employment at the project site. The training shall be prepared by the project's cultural resources specialist (as defined in CUL-1) in consultation with local Native Americans and shall incorporate the traditions and beliefs of local Native American groups into the presentation. The presentation may be conducted by any qualified cultural resources specialist and a Native American, if possible, and may be presented in the form of a video. A consulting fee or honorarium shall be negotiated with the local Native American consultants and presenter and paid to them for their participation. The training may be discontinued when project activities are completed or suspended but must be resumed when project activities resume.

The training shall include:

1. A discussion of applicable laws and penalties under the law;

2. Samples or visuals of artifacts that might be found in the project vicinity;

3. A discussion of what such artifacts may look like when partially buried, or wholly buried and then freshly exposed;

4. A discussion of what prehistoric and historical archaeological deposits look like at the surface and when exposed during ground-disturbance, and the range of variation in the appearance of such deposits;

5. A discussion of what local Native American beliefs are, how those beliefs are related to cultural resources that may be found in the area, and the appropriate respectful behavior towards sacred places and objects;

6. Instruction that all cultural resources specialists have the authority to halt ground disturbance in the area of a discovery to an extent sufficient to ensure that the resource is protected from further impacts, as determined by the project cultural resources specialist (as defined in CUL-1);

7. Instruction that employees are to avoid areas flagged as sensitive for cultural resources;

8. Instruction that employees are to halt work on their own in the vicinity of a potential cultural resources discovery and shall contact their supervisor and the project cultural resources specialist (as defined in CUL-1), and that redirection of work would be determined by the project supervisor and the project cultural resources specialist;

9. An informational brochure that identifies reporting procedures in the event of a discovery;

10. An acknowledgement form signed by each worker indicating that they have received the training which shall be submitted to the County Planning Department and any other CEQA lead agency; and,

11. A sticker that shall be placed on hard hats indicating that environmental training has been completed.

REGPA PEIR MM CUL-1f: Conduct cultural resources reporting.

The project cultural resources specialist shall document results in interim and final reports as necessary. The contents and timing of these reports shall be stipulated in the Cultural Resources Management and Treatment Plan (CUL-1b). Final reports for archaeological resources, human remains, and some landscapes, shall be written by or under the direction of a Secretary of the Interior qualified archaeologist or architectural historian as appropriate for the project. Reports shall be provided in the State Office of Historic Preservation's *Archaeological Resource Management Reports: Recommended Contents and Format* and local agency formats. Final documents shall report on all field activities including dates, times and locations, results, samplings, and analyses. All survey reports, Department of Parks and Recreation 523 forms, data recovery reports, and any additional research reports not previously submitted to the CHRIS and the State Historic Preservation Officer shall be included as appendices.

REGPA PEIR MM CUL-1g: Proper curation of cultural resources collections.

All archaeological materials retained as a result of the cultural resources investigations (survey, testing, data recovery) shall be curated in accordance the California State Historical Resources Commission's *Guidelines for the Curation of Archaeological Collections*, into a retrievable storage collection in a public repository or museum. Additionally, all collection and retention of archaeological materials as a result of cultural resources investigations must comply with the regulations and policies of the land managing agency or property owner.

REGPA PEIR MM CUL-2: Implement Proper Actions in the Event of the Incidental Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be notified within 24-hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie potential remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are or are believed to be Native American, the Coroner shall notify the NAHC within 24-hours. In accordance with California PRC Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant of the deceased Native American. The descendants shall complete their inspection within 48-hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the County, the disposition of the human remains. Should human remains be discovered at any time during construction of the project, construction in the vicinity would halt and the County Coroner would be contacted immediately. If the Coroner determines that the remains do not require an assessment of cause of death and are probably Native American, then the NAHC would be contacted to identify the most likely descendant.

REGPA PEIR MM PALEO-1: Protect Paleontological Resources

Project developers shall document in a paleontological resources assessment report whether paleontological resources exist in a project area on the basis of the following: the geologic context of the region and site and its potential to contain paleontological resources (including the fossil yield potential), a records search of institutions holding paleontological collections from California desert regions, a review of published and unpublished literature for past paleontological finds in the area, and coordination with paleontological researchers working locally in potentially affected geographic areas (or studying similar geologic strata).

If paleontological resources are present at the site or if the geologic units to be encountered by the project (at the surface or the subsurface) have a high/very high or moderate/unknown fossil yield, a Paleontological Resources Management Plan shall be developed.

The plan shall include the following types of requirements:

1. The qualifications of the principal investigator and monitoring personnel.
2. Construction crew awareness training content, procedures, and requirements.
3. Any measures to prevent potential looting, vandalism, or erosion impacts.
4. The location, frequency, and schedule for on-site monitoring activities.
5. Criteria for identifying and evaluating potential fossil specimens or localities.
6. A plan for the use of protective barriers and signs, or implementation of other physical or administrative protection measures.
7. Collection and salvage procedures.
8. Identification of an institution or museum willing and able to accept any fossils discovered.
9. Compliance monitoring and reporting procedures.

If the geologic units that would be affected by the project have been determined to have low fossil yield potential, paleontological resources shall be included as an element in construction worker awareness training. The training shall include measures to be followed in the event of unanticipated discoveries, including suspension of construction activities in the vicinity.

The Paleontological Resources Management Plan shall evaluate all of the construction methods proposed, including destructive excavation techniques. Where applicable, the principal investigator shall include in the plan an evaluation of the potential for such techniques to disturb or destroy paleontological resources, an evaluation of whether loss of such fossils would represent a significant impact, and discussion of mitigation or compensatory measures (such as recordation/recovery of similar resources elsewhere on the site) that are necessary to avoid or substantially reduce the impact.

VI. GEOLOGY AND SOILS

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:	☐	☐	☐	☒
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area, or based on other substantial evidence of a known fault (refer to CGS Special Publication 42)?	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☐	☒
iii. Seismic related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

A Geotechnical Recommendation Report was prepared on March 2, 2021, by Matt MacDonald, and is incorporated below and included as Appendix J to this IS/Addendum.

Environmental Setting

Stratigraphy

The Charleston View SEDA includes mostly level topography, with some minor uplands in the southwestern SEDA “panhandle” area associated with the adjacent Nopah Range to the west and/or the northernmost extension of the Kingston Range. Surface exposures within the SEDA consist predominantly of late Quaternary alluvial/lake deposits, alluvial fans, older Quaternary alluvial/sedimentary deposits, and sandy to loamy topsoils in the more level areas (with impervious substrata, or hardpans, occurring locally); also present are a mix of Precambrian/ Paleozoic

metasedimentary rocks and older Quaternary alluvial/sedimentary deposits in the "panhandle" area uplands. The Nopah Range to the west includes primarily Precambrian and Paleozoic metasediments, with areas to the south (Kingston Range) exhibiting Precambrian/ Paleozoic metasedimentary strata and a mix of Tertiary granitic and metamorphic rocks (County 2015).

Groundwater

The Charleston View SEDA is within the area extent of the Pahrump Valley and California Valley groundwater basins. Local groundwater levels for the Pahrump Valley Basin in the site vicinity are approximately 130-feet below the surface, with reported well depths of between 8- and 42-feet for the California Valley Basin and perched groundwater is also potentially present in both basins. The northern portion of the Pahrump Valley Basin has also experienced an overall decline of aquifer levels in recent decades with an associated area of potential subsidence (although this area is located northeast of the Charleston View SEDA and is primarily in the State of Nevada (County 2015). As outlined in the Geotechnical Recommendation Report, groundwater was not encountered within any of the boring nor test pits at the time of the subsurface investigation (Matt McDonald 2021).

Structure and Seismicity

No active or potentially active faults (or associated California Geological Survey [CGS] Earthquake Fault Zone designations) are mapped within the Charleston View SEDA, although the potentially active Pahrump Valley Fault is adjacent to the northwest and several additional faults occur within nearby areas to the north and northwest. The Charleston View SEDA is within a Seismic Zone 3 designation, with major regional faults capable of generating large-magnitude earthquake events (County 2015).

As outlined in the Geotechnical Recommendations Report, data was obtained from the soil boring explorations to determine the Seismic Site Class for the proposed project. It was determined that there is a moderate risk of significant seismic activity (Matt McDonald 2021).

Soils

According to the NRCS Web Soil Survey, majority of the project site is located in the Mojave Desert Area of California, where no NRCS digital data is available. The area immediately northeast of the project site consists of Corbilt gravelly loamy fine sand unit, which is reasonably assumed to be consistent with the site's subsurface conditions. Corbilt gravelly loamy fine sand unit is well drained with low to moderate available water storage (Matt McDonald 2021).

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.6, *Geology and Soils*, of the REGPA PEIR, with implementation of Mitigation Measure GEO-1, impacts related to geology and soils would be less than significant.

Discussion of Project Impacts

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

   i. Rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area, or based on other substantial evidence of a known fault (refer to CGS Special Publication 42)?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that because no active or potentially active faults are mapped or known to occur within the Charleston View SEDA, ground rapture hazards are generally low, and associated impacts would be less than significant. However, surface displacements such as lurching or cracking could potentially occur at locations within or adjacent to the Charleston View SEDA as a result of off-site seismic activity, although the probability of such events is considered low. Since assessment of seismic ground rupture potential is a standard element of a geotechnical investigation, this potential hazard would be evaluated as part of a site-specific geotechnical investigation that is required under Mitigation Measure GEO-1. With implementation of Mitigation Measure GEO-1, the impact would be less than significant.

Impacts from the Proposed Project

The proposed project would be located in the Charleston View SEDA in southeastern Inyo County, California. No active or potentially active faults (or associated CGS Earthquake Fault Zone designations) are mapped within the Charleston View SEDA, although the potentially active Pahrump Valley Fault is adjacent to the northwest, and several additional faults occur within nearby areas to the north and northwest. The Charleston View SEDA is within a Seismic Zone 3 designation, with major regional faults capable of generating large-magnitude earthquake events (County 2015).

According to the DOC Earthquake Zones of Required Investigation Map, the project is not located within an Earthquake Fault Zone, and no fault zones are known to exist within the project site (DOC 2025b). The closest Alquist-Priolo Fault Zone to the project site is the Southern Death Valley Fault Zone of the Foothills Fault System, located approximately 35-miles west of the site.

A Geotechnical Recommendation Report was prepared by Mott McDonald for the proposed project (Appendix J). As outlined in the Geotechnical Recommendations Report, data was obtained from the soil boring explorations to determine the Seismic Site Class for the proposed project. It was determined that there is a moderate risk of significant seismic activity. However, the structural components, racking systems, and foundations will be designed to accommodate the computed seismic site class and local ground motions associated with the regional setting. The geotechnical recommendations and considerations relative to solar array, panel, and substations foundations outlined in the Geotechnical Recommendation Report would be considered and implemented during the final design and during construction of each region. Additionally, the proposed project would be required to comply with the provisions of the California Building Code (CBC). Therefore, with implementation of these

recommendations and CBC provisions, the project would not expose people or structures to potential substantial adverse effects caused by earthquake fault ruptures.

As a Geotechnical Recommendation Report was prepared, Mitigation Measures GEO-1 has been satisfied for the proposed project.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

ii. Strong seismic ground shaking?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that much of the County, including the Charleston View SEDA, could experience peak ground shaking values of 0.4 Gal or more in association with large earthquake events along major faults. This level of ground shaking could potentially result in significant impacts to proposed facilities such as solar arrays and utilities. However, Mitigation Measure GEO-1, which requires preparation of a site-specific geotechnical investigation, would be implemented to address these potential impacts and to evaluate potential geologic hazards and identify associated standard remedial measures. With implementation of Mitigation Measure GEO-1, the impact would be less than significant.

Impacts from the Proposed Project

As outlined in question a.i), no active or potentially active faults (or associated CGS Earthquake Fault Zone designations) are mapped within the Charleston View SEDA, although the potentially active Pahrump Valley Fault is adjacent to the northwest, and several additional faults occur within nearby areas to the north and northwest. The Charleston View SEDA is within a Seismic Zone 3 designation, with major regional faults capable of generating large-magnitude earthquake events (County 2015). According to the DOC Earthquake Zones of Required Investigation Map, the project is not located within an Earthquake Fault Zone, and no fault zones are known to exist within the project site (DOC 2025b). The closest Alquist-Priolo Fault Zone to the project site is the Southern Death Valley Fault Zone of the Foothills Fault System, located approximately 35-miles west of the site.

A Geotechnical Recommendation Report was prepared by Mott McDonald for the proposed project. As outlined in the Geotechnical Recommendations Report, data was obtained from the soil boring explorations to determine the Seismic Site Class for the proposed project. It was determined that there is a moderate risk of significant seismic activity. However, the structural components, racking systems, and foundations will be designed to accommodate the computed seismic site class and local ground motions associated with the regional setting. The geotechnical recommendations and considerations relative to solar array, panel, and substations foundations outlined in the Geotechnical Recommendation Report would be considered and implemented during the final design and during the construction activities at each region. Additionally, the proposed project would be required to comply with the provisions of the CBC. Therefore, with implementation of these recommendations and CBC

provisions, the project would not expose people or structures to potential substantial adverse effects caused by seismic ground shaking.

As a Geotechnical Recommendation Report was prepared, Mitigation Measures GEO-1 has been satisfied for the proposed project.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

iii. Seismic related ground failure, including liquefaction?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that potential liquefaction and related impacts associated with development of the Charleston SEDA would be significant due to the presence of alluvial deposits in a number of on-site and adjacent areas. However, Mitigation Measure GEO-1, which requires preparation of a site-specific geotechnical investigation, would be implemented to address these potential impacts and to evaluate potential geologic hazards and identify associated standard remedial measures. With implementation of Mitigation Measure GEO-1, the impact would be less than significant.

Impacts from the Proposed Project

The proposed project would be located in the Charleston View SEDA in southeastern Inyo County, California. According to the DOC Earthquake Zones of Required Investigation Map, the project is not located within a Liquefaction Zone, and no liquefaction zones are known to exist within the project site (DOC 2025b). Additionally, as outlined in question a.i), a Geotechnical Recommendation Report was prepared by Matt McDonald for the proposed project. Data was obtained from the soil boring explorations to determine the Seismic Site Class for the proposed project. It was determined that there is a moderate risk of significant seismic activity. However, the structural components, racking systems, and foundations will be designed to accommodate the computed seismic site class and local ground motions associated with the regional setting. The geotechnical recommendations and considerations relative to solar array, panel, and substations foundations outlined in the Geotechnical Recommendation Report would be considered and implemented during the final design and during construction activities at each region. Additionally, the proposed project would be required to comply with the provisions of the CBC. Therefore, with implementation of these recommendations and CBC provisions, the project would not expose people or structures to potential substantial adverse effects caused by liquefaction.

As a Geotechnical Recommendation Report was prepared, Mitigation Measures GEO-1 has been satisfied for the proposed project.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

iv. Landslides?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that because the nature and location of site-specific development is unknown, landslide deposits and/or steeper manufactured slopes could potentially be encountered/constructed during development within the Charleston View SEDA, and associated impacts are considered potentially significant. However, Mitigation Measure GEO-1, which requires preparation of a site-specific geotechnical investigation, would be implemented to address these potential impacts and to evaluate potential geologic hazards and identify associated standard remedial measures. With implementation of Mitigation Measure GEO-1, the impact would be less than significant.

Impacts from the Proposed Project

The project site is predominantly flat, arid, and sparsely vegetated with elevations that range from 2,500- to 2,660-feet amsl. According to the Earthquake Zones of Required Investigation Map, the project is not within a known Landslide Zone (DOC 2025b). As outlined in the Geotechnical Recommendation Report, the landslide hazard rating is noted to be a “low incidence” (landslide unlikely) area within the project site and there are no documented landslides within or immediately adjacent to the project boundaries (Matt McDonald 2021). Therefore, the project would not expose people or structures to potentially substantial adverse effects caused by landslides.

As a Geotechnical Recommendation Report was prepared, Mitigation Measures GEO-1 has been satisfied for the proposed project.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

b) Would the project result in substantial soil erosion or the loss of topsoil?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that project activities would likely involve the removal of surface stabilizing features such as vegetation, excavation of existing compacted materials from graded or cut areas, redeposition of excavated material as fill in proposed development sites and, potentially, disposal of extracted groundwater onto graded or unstable areas (i.e., during construction dewatering). These potential effects are addressed in Section 4.9, *Hydrology and Water Quality*, of the REGPA PEIR due to their relationship to water quality concerns.

Impacts from the Proposed Project

According to the NRCS Web Soil Survey, majority of the project site is located in the Mojave Desert Area of California, where no NRCS digital data is available. The area immediately northeast of the project site consists of Corbilt gravelly loamy fine sand unit, which is reasonably assumed to be consistent with the site’s subsurface conditions. Corbilt gravelly loamy fine sand unit is well drained with low to moderate available water storage and has a slight erosion hazard (Mott McDonald 2021).

Construction activities that require more than 1-acre of ground disturbance are regulated by the Lahontan RWQCB and are subject to the requirements of the NPDES General Construction Permit, including preparation and implementation of a SWPPP during construction. The SWPPP must include details of how the sediment and erosion control BMPs would be implemented. As the proposed project would disturb greater than once acre, the proposed project would be subject to NPDES requirements and would be required to prepare and implement a SWPPP including BMPs to reduce soil erosion during construction activities. Additionally, the proposed project would be required to adhere to the provisions of the CBC and the County Grading Ordinance, in which erosion control would be required for grading or filling or stripping of vegetation.

Therefore, with the required compliance with existing NPDES and County regulations, construction of the proposed project would not result in substantial soil erosion or the loss of topsoil.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that implementation of proposed solar development associated with the Charleston View SEDA could potentially result in impacts associated with geologic and soil instability. Specifically, this could involve issues related to compressible/collapsible soils, subsidence, and corrosive soils based on geologic conditions and the fact that site-specific facility locations are unknown. However, Mitigation Measure GEO-1, which requires preparation of a site-specific geotechnical investigation, would be implemented to address these potential impacts and to evaluate potential geologic hazards and identify associated standard remedial measures. With implementation of Mitigation Measure GEO-1, the impact would be less than significant.

Impacts from the Proposed Project

According to the NRCS Web Soil Survey, majority of the project site is located in the Mojave Desert Area of California, where no NRCS digital data is available. The area immediately northeast of the project site consists of Corbilt gravelly loamy fine sand unit, which is reasonably assumed to be consistent with the site's subsurface conditions. Corbilt gravelly loamy fine sand unit is well drained with low to moderate available water storage and has a slight erosion hazard (Mott McDonald 2021).

As outlined in question a.i), a Geotechnical Recommendation Report was prepared by Mott McDonald for the proposed project. Data was obtained from the soil boring explorations to determine the Seismic Site Class for the proposed project. It was determined that there is a moderate risk of significant seismic activity. However, the structural components, racking systems, and foundations will be designed to accommodate the computed seismic site class and local ground motions associated with the regional setting. The geotechnical recommendations and considerations relative to solar array, panel, and

substations foundations outlined in the Geotechnical Recommendation Report would be considered and implemented during the final design and during construction activities at each region. Additionally, the proposed project would be required to comply with the provisions of the CBC. Therefore, with implementation of these recommendations and CBC provisions, the project would not expose people or structures to potential substantial adverse effects caused by fault rupture, seismic activity, and liquefaction.

As outlined in question a.iv), according to the Earthquake Zones of Required Investigation Map, the project is not within a known Landslide Zone (DOC 2025b). Additionally, the landslide hazard rating is noted to be a "low incidence" (landslide unlikely) area within the project site and there are no documented landslides within or immediately adjacent to the project boundaries (Matt McDonald 2021). Therefore, the project would not expose people or structures to potentially substantial adverse effects caused by landslides.

As a Geotechnical Recommendation Report was prepared, Mitigation Measures GEO-1 has been satisfied for the proposed project.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

c) Would the project be located on expansive soil, as defined in Table 18-1-B of the CBC, creating substantial risks to life or property?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that based on preliminary analysis, a number of surficial and underlying deposits within the Charleston View SEDA and adjacent areas may potentially exhibit expansive properties, with associated significant potential impacts to proposed solar development. However, Mitigation Measure GEO-1, which requires preparation of a site-specific geotechnical investigation, would be implemented to address these potential impacts and to evaluate potential geologic hazards and identify associated standard remedial measures. With implementation of Mitigation Measure GEO-1, the impact would be less than significant.

Impacts from the Proposed Project

According to the NRCS Web Soil Survey, majority of the project site is located in the Mojave Desert Area of California, where no NRCS digital data is available. The area immediately northeast of the project site consists of Corbilt gravelly loamy fine sand unit, which is reasonably assumed to be consistent with the site's subsurface conditions. Corbilt gravelly loamy fine sand unit is well drained with low to moderate available water storage and has a slight erosion hazard (Mott McDonald 2021).

Although the project could be located on an expansive soil, the geotechnical recommendations and considerations relative to the solar array, panel, and substations foundations outlined in the Geotechnical Recommendation Report would be considered and implemented during the final design and during construction activities at each region . Additionally, the proposed project would be required

to comply with the provisions of the CBC. Therefore, with implementation of these recommendations and CBC provisions, the project would not create a substantial risk to life or property.

As a Geotechnical Recommendation Report was prepared, Mitigation Measures GEO-1 has been satisfied for the proposed project.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

d) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that implementation of proposed solar development within the Charleston View SEDA would not involve the use of septic tanks or alternative wastewater systems. Accordingly, no associated impacts would result from proposed project implementation.

Impacts from the Proposed Project

A permitted septic system and/or tile field (if permitted) would be installed for wastewater treatment and disposal. Additionally, porta-johns would be used for construction employees.

According to the NRCS Web Soil Survey, majority of the project site is located in the Mojave Desert Area of California, where no NRCS digital data is available. The area immediately northeast of the project site consists of Corbilt gravelly loamy fine sand unit, which is reasonably assumed to be consistent with the site's subsurface conditions. Corbilt gravelly loamy fine sand unit is well drained with low to moderate available water storage and has a slight erosion hazard (Mott McDonald 2021). As the soils on-site are well drained, it is anticipated that the soils would be capable of supporting the septic system, if installed as part of the proposed project. Additionally, the geotechnical recommendations and considerations relative to the solar array, panel, and substations foundations outlined in the Geotechnical Recommendation Report would be considered and implemented during the final design and during construction activities at each region.

Therefore, no impact would occur and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

No Mitigation Measures from the REGPA PEIR are applicable to the proposed project related to geology and soils.

VII. GREENHOUSE GAS EMISSIONS

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

An Air Quality and GHG Emissions Report was prepared by ERM on March 26, 2026, and is incorporated below and included as Appendix F to this IS/Addendum.

Environmental Setting

Global climate change refers to changes in average climatic conditions on Earth, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by atmospheric gases. These gases are commonly referred to as GHGs because they function like a greenhouse by letting sunlight in but preventing heat from escaping, thus warming the Earth's atmosphere.

GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and, (4) solid waste decomposition.

The GHGs defined under California's AB 32, described below, include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Estimates of GHG emissions are commonly presented in carbon dioxide equivalents (CO_2e), which weigh each gas by its global warming potential (GWP). Expressing GHG emissions in CO_2e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. GHG emissions quantities in this analysis are presented in metric tons (MT) of CO_2e. For consistency with United Nations Standards, modeling, and reporting of GHGs in California and the U.S. use the GWPs defined in the Intergovernmental Panel on Climate Change's (IPCC) Fourth Assessment Report (IPCC 2007): CO_2 – 1; CH_4 – 25; N_2O – 298.

Regulatory Setting

The primary GHG reduction regulatory legislation and plans (applicable to the project) at the State, regional, and local levels are described below. Implementation of California's GHG reduction mandates are primarily under the authority of the California Air Resources Board (CARB) at the State level, GBUAPCD at the regional level, and the County at the local level.

Executive Order S-3-05: On June 1, 2005, Executive Order (EO) S-3-05 proclaimed that California is vulnerable to climate change impacts. It declared that increased temperatures could reduce snowpack in the Sierra Nevada, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To avoid or reduce climate change impacts, EO S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to the year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Executive Orders are not laws and can only provide the governor's direction to State agencies to act within their authority to reinforce existing laws.

Assembly Bill 32 – Global Warming Solution Act of 2006: The California Global Warming Solutions Act of 2006, widely known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of Statewide GHG emissions. CARB is directed by AB 32 to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG emission reductions.

Senate Bill 97: SB 97, enacted in 2007, amended CEQA to establish that GHG emissions and their effects are a prominent environmental issue that require analysis and identification of feasible mitigation under CEQA. GHG emissions were incorporated into the CEQA Guidelines on 18 March 2010.

Senate Bill 375: SB 375, signed in September 2008, aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPO) to adopt a Sustainable Communities Strategy or Alternative Planning Strategy, which will prescribe land use allocation in that MPO's Regional Transportation Plan. CARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every 8-years but can be updated every 4-years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's Sustainable Communities Strategy or Alternative Planning Strategy for consistency with its assigned targets. If MPOs do not meet the GHG emission reduction targets, transportation projects would not be eligible for funding programmed after 1 January 2012.

Senate Bill 743: With the passing of SB 743 in 2013, the Governor's Office of Planning and Research amended the CEQA Guidelines providing alternative criteria to level of service for evaluating transportation impacts. One of the goals of the new criteria is to promote the reduction of GHG. Local jurisdictions were required to implement SB 743 by 1 July 2020 or do additional transportation analysis on a project-by-project basis.

Executive Order B-30-15: On April 29, 2015, EO B-30-15 established a California GHG emission reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG emission reduction targets with those of leading international governments, including the 28-nation European Union. California successfully met the target of reducing GHG emissions to 1990 levels by 2020, as established in AB 32, achieving this goal four years early in 2016. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the goal established by EO S-3-05 of reducing emissions to 80 percent under 1990 levels by 2050.

Senate Bill 350: SB 350, also known as the Clean Energy and Pollution Reduction Act, was enacted in 2015. It established clean energy, clean air, and GHG reduction goals, including reducing GHG to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050. SB 350 also increases

California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This objective will increase the use of Renewable Portfolio Standard (RPS) eligible resources, including solar, wind, biomass, geothermal, and others

Senate Bill 32: Signed into law by Governor Brown on September 8, 2016, SB 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a Statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EO B-30-15 of 80 percent below 1990 emissions levels by 2050.

Assembly Bill 1279: Approved by Governor Newsom on September 16, 2022, AB 1279, the California Climate Crisis Act, declares the policy of the State to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and ensure that by 2045, Statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. AB 1279 anticipates achieving these policies through direct GHG emissions reductions, removal of CO_2 from the atmosphere (carbon capture), and an almost complete transition away from fossil fuels.

Senate Bill 100: On 10 September 2018, Governor Brown signed SB 100, establishing that 100 percent of all electricity in California must be obtained from renewable and zero-carbon energy resources by 31 December 2045. SB 100 also creates new standards for the RPS goals established by SB 350 in 2015. Specifically, the bill increases required energy from renewable sources for both investor owned utilities and publicly owned utilities from 50 percent to 60 percent by 2030. Incrementally, these energy providers must also have a renewable energy supply of 33 percent by 2020, 44 percent by 2024, and 52 percent by 2027. California must procure 100 percent of its energy from carbon free energy sources by the end of 2045

California Air Resources Board Scoping Plan: The Scoping Plan is a strategy CARB develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed across our society and economy to reduce emissions and reach our climate targets. The current 2022 Scoping Plan is the third update to the original plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 mandate of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 mandate and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the SB 32 mandate of reducing GHGs by at least 40 percent below 1990 levels by 2030.

On December 15, 2022, CARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels; further reductions in SLCPs; support for sustainable

development; increased action on natural and working lands to reduce emissions and sequester carbon; and the capture and storage of carbon (CARB 2022).

Great Basin Unified Air Pollution Control District: The GBUAPCD regulates air quality in the County according to the standards established in the CAA and amendments to that act. The GBUAPCD regulates air quality through its permitting authority and through air quality-related planning and review activities over most types of stationary emission sources.

Inyo County General Plan: Although the General Plan (2002, as amended) does not currently include any goals, policies, or implementation measures specifically related to GHG emissions, the Conservation and Open Space Element was updated in 2014 with an Energy Efficiency chapter that contains the following policies which indirectly address global climate change.

- **Policy EE-1.2.** The County will continue to evaluate energy use and reduction targets as a way to promote energy efficiency throughout the County and as a means to reduce operating costs.
- **Policy EE-1.3.** The County will continue to implement the action items identified in the 2012 Energy Action Plan to meet its overall energy reduction goals as long as those actions will result in savings to the County from reduced energy usage.

Energy Action Plan: An Energy Action Plan was prepared for the County in October 2012 with the purpose of outlining a strategy to reduce energy use and costs throughout the County. The plan establishes a long-term vision for energy efficiency, identifies reduction goals and milestones, provides potential energy reduction policies and procedures, identifies County buildings that are highly energy efficient and County buildings that require improvements, and presents potential funding mechanisms for energy efficiency projects.

Inyo County Code Title 21: Renewable Energy Ordinance: The County adopted Inyo County Code Title 21, the Renewable Energy Ordinance, in 2010. The ordinance supports and encourages the responsible utilization of the County's natural resources and encourages the use of clean, renewable energy sources. This ordinance focuses mainly on the use of wind and solar resources for alternative energy purposes.

Inyo County Renewable Energy General Plan Amendment: Inyo County's REGPA aims to guide the development of renewable energy projects within the county, particularly solar facilities, while balancing energy needs with environmental and socioeconomic considerations. The amendment, which was approved in 2015, includes policies for sitting both community and utility-scale solar facilities, but it does not include policies specific to GHG.

Methodology and Assumptions

GHG emissions were modeled using the CalEEMod, version 2022.1.1.29. CalEEMod is a statewide land use emissions computer model designed to quantify potential GHG emissions associated with both construction and operations from a variety of land use projects. See Section 5.III, Air Quality, for a discussion of methodology and assumptions.

Significance Criteria

As discussed in Section 5.III, Air Quality, neither Inyo County nor the GBUAPCD have established numerical significance thresholds for quantitatively determining GHG impacts. CEQA, however, allows lead agencies to rely on standards or thresholds promulgated by other agencies. The GBUAPCD has allowed use of the numerical standards of MDAQMD in prior CEQA reviews. Because GHG is a global issue and reduction goals are the same across California, the numerical threshold set for MDAB is 100,000 short tons of CO_2e, or 90,718 MT of CO_2e, is considered adequate to serve as a significance threshold for the proposed project.

Because impacts from construction activities occur over a relatively short-term period, they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. Therefore, it is recommended that construction emissions be amortized over the 50-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.7, *Greenhouse Gas Emissions*, of the REGPA PEIR, with implementation of Mitigation Measures GHG-1, impacts associated with global climate change and GHG emissions would be less than significant.

Discussion of Project Impacts

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that construction emissions are temporary in nature, and are not expected to result in any appreciable long-term increase in ambient GHG levels; however, details regarding individual solar projects are unknown at this time (e.g., site design, equipment fleet, and measures to reduce GHG emissions), project-specific analyses will be necessary to ensure that potential emissions associated with construction comply with the interim SCAQMD GHG thresholds. The REGPA PEIR also concluded that as details regarding individual solar projects are unknown at this time, project-specific analyses will be necessary to ensure that potential emissions associated with solar project operations comply with the interim SCAQMD GHG thresholds. With implementation of Mitigation Measure GHG-1, which requires a site-specific technical greenhouse report, construction and operational-related impacts would be less than significant. The REGPA PEIR also noted that as it is assumed the project would be fully built out and that average capacity would be 75 percent of the maximum capacity, this calculation shows that the project could result in the offset of up to approximately 1 million metric tons (MMT) CO_2e per year. This would result in a beneficial impact.

Impacts from the Proposed Project

An Air Quality and GHG Emissions Report was prepared for the proposed project (included as Appendix F). As an Air Quality and Greenhouse Emissions Report was prepared, REGPA PEIR Mitigation Measure

GHG-1 has been satisfied for the proposed project. The project would generate GHG emissions directly and indirectly during construction and routine operational and maintenance-related activities. The majority of emissions from the project would be generated during construction-related activities.

Construction Emissions

Construction-related activities of the project will generate temporary GHG emissions primarily from the use of on-site construction equipment, vehicles transporting construction workers to and from the project, and heavy-duty trucks used to import materials.

Table 9, *Estimated GHG Emissions During Construction*, presents total estimated emissions from construction related activities from on-site and off-site emission sources. The estimated total GHG emissions during project construction-related activities will be approximately 12,651 MT CO_2e over the 18-month construction period. Estimated construction emissions related to the project amortized over 50 years, the anticipated project lifetime, would be approximately 253 MT CO_2e per year.

Table 9: Estimated Greenhouse Gas Emissions During Construction

Year	Total Emissions (MT CO_2e)
2026	1,267
2027	9,265
2028	2,119
Total Construction	**12,651**
Amortized Emissions (50 year life)	**253**

Note: CO_2e= carbon dioxide equivalent; MT = metric tons

Operational Emissions

Operation- and maintenance-related activities of the project will generate GHG emissions largely through motor vehicle trips to and from the project, on-site maintenance activities involving portable equipment and maintenance vehicles, and energy use associated with water consumption. Table 10, *Estimated Annual Operation GHG Emissions*, summarizes operational-related emissions associated with the project. The project would emit an estimated 67 MT CO_2e per year during operational related activities. The total construction GHG emissions, amortized over 50 years, was added to the annual estimated operational emissions to estimate annual GHG emissions generated by the project. As shown in Table 10, the project would emit an average of 320 MT CO_2e per year over the operational life of the project (assumed 50 years). Operational emissions presented are also a conservative estimate as it does not take into account displaced emissions from the energy generated at the facility.

Table 10: Estimated Annual Operational Greenhouse Gas Emissions

	Total Emissions (MT CO_2e)
Operation	60
Amortized Construction Emission	253
Annual Total	**320**
Annual Threshold	**90,718**
Exceed Annual Threshold?	**No**

Note: CO_2e= carbon dioxide equivalent; MT = metric tons

Impact Conclusion

The project-related emissions would be considered to have a significant cumulative impact if project specific impacts are determined to be significant. As previously discussed above, the proposed project would generate GHG emissions during construction- and routine operational- and maintenance-related activities. However, the proposed solar generating facility will offset GHG emissions by replacing energy generated by fossil-fueled power plants; therefore, the numerical GHG emissions are a conservative estimate.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the project would support the development of solar energy projects, which would provide renewable energy and could offset up to one (1) MMT CO_2e per year. This reduction in GHG emissions would support the goals of the General Plan, as well as the goals of AB 32 and the RPS. Additionally, the proposed project includes a new General Plan policy, Policy WR-3.5, to further address the reduction of GHG emissions through lowered water consumption. Therefore, the project would not conflict with plans adopted for the purpose of reducing GHG emissions and the impact would be less than significant.

Impacts from the Proposed Project

The project involves the construction, operation, and maintenance-related activities of a solar facility that would produce a new renewable source of energy in Inyo County. This additional solar-generated energy would be added to the power grid and used in place of electricity generated by fossil-fuel sources and thus would directly support energy goals under SB 32, SB 100, and the CARB 2022 Scoping Plan. Additionally, the project would be consistent with the Inyo County Code Title 21 to encourage renewable energy, including solar facilities.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

No Mitigation Measures from the REGPA PEIR are applicable to the proposed project related to GHG emissions.

VIII. HAZARDS AND HAZARDOUS MATERIALS

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Be located on a site which is included on a list of hazardous materials sites and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
d) For a project within the vicinity of an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
e) For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or wastes, within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
g) Physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

A Phase I Environmental Site Assessment (ESA) was prepared on April 5, 2024, by Ninyo & Moore, and is incorporated and included as Appendix K to this IS/Addendum. A Wildfire Safety Investigations Memorandum was prepared on February 6, 2026, by ERM, and is incorporated and included as Appendix L to this IS/Addendum.

The objective of the Phase I ESA is to identify, to the extent feasible pursuant to the process described in American Society for Testing and Materials (ASTM) E1527-21, recognized environmental conditions (RECs), which are defined by ASTM as "(1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or, (3) the presence of hazardous substances or petroleum products in, on,

or at the subject property under conditions that pose a material threat of a future release to the environment".

Environmental Setting

Hazardous Material Sites

Hazardous material uses and disposal activities are routinely tracked and documented on numerous federal, State, and local databases. Two of the primary hazardous material database sites in the State of California are the SWRCB GeoTracker and California Department of Toxic Substance Control (DTSC) EnviroStor (Government Code 65962.5/Cortese) lists. Based on the results of the databases reviewed, the project site is not located on a hazardous contamination site (SWRCB 2025, DTSC 2025).

According to the California Geologic Energy Management Division (CalGEM) Online Mapping System, the project site does not lie within the administrative boundaries of an oil field, and no oil or gas wells are located on the project site (Ninyo & Moore 2024). Additionally, the County Department of Environmental Health (IDCEH) was contacted regarding hazardous materials or hazardous waste records associated with the project site and the County noted that no files or records were available for the project site (Ninyo & Moore 2024). Based on review of historical resources, including historical aerial photographs, historical topographic maps, land use records, and interviews with property representatives, it was determined that the project site was unimproved, undeveloped, and vacant with desert vegetation dating back to at least 1953 (Ninyo & Moore 2024).

Airport Hazards

Sky Ranch Airport is located approximately 18-miles south of the project site in Sandy Valley. Additionally, there is an unnamed, abandoned runway several miles from the project site. Hidden Hills Airport is located 1.3-miles northeast of the project site. However, this airport was abandoned about 15-years and was removed from the JEPP charts. Therefore, Hidden Hills Airport is not an officially recognized airport, according to the FAA (Appendix D).

Nearby Schools

There are no schools located within the project vicinity. The nearest school to the project site is Hafen Elementary School, located approximately 6.9-miles northeast of the project site at 7120 Hafen Road in Pahrump, Nevada.

Emergency Response/Evacuation Plans

The County Environmental Health Services Department (EHSD) implements a Hazardous Materials Area Plan (HMAP) , which provides directions to EHSD, other agencies and businesses, and the general public regarding appropriate actions and responses in the event of a release or threatened release of hazardous materials. Evacuation routes within the County would include (but not necessarily be limited to) US 395 and 6, and SR 168, 136, 190, 127 and 178 (County 2015).

Wildfire Hazards

Under Public Resource Code Section 4126(a-c), "wildland" includes lands covered wholly or partly by forests, timber, brush, undergrowth, or grass, as well as contiguous range or forage lands that are all vegetation types capable of supporting wildfire. These wildland areas form the foundation for California Department of Forestry and Fire Protection's (CAL FIRE) Fire Hazard Severity Zone (FHSZ) modeling, which evaluates existing and potential natural vegetation (fuel) as a primary determinant of hazard. CAL FIRE classifies lands into Moderate, High, and Very High hazard categories based on fuel loading, slope, fire weather, and wind-driven fire spread identified by the Office of the State Fire Marshal (OSFM). "Hazard" reflects the physical conditions that influence fire likelihood and behavior over a 30- to 50-year period, without accounting for mitigation measures such as home hardening, recent wildfire, or vegetation management (CAL FIRE 2025).

The FHSZ for State Responsibility Areas (SRA) was updated and implemented statewide, effective 1 April 2024 (OSFM 2024). OSFM subsequently released updated FHSZ recommendations for Local Responsibility Areas (LRA) on 24 March 2025; Government Code Section 51179 requires local agencies to adopt the recommended LRA maps by ordinance and prohibits a decrease in hazard level relative to the State's designations (OSFM 2025). Inyo County adopted the updated LRA FHSZ designations by ordinance on 5 August 2025. Inyo County's public Geographic Information System (GIS) service publishes both SRA and LRA layers using the OSFM FHSZ classification nomenclature (Moderate, High, Very High) and is an appropriate local reference alongside the statewide OSFM viewer.

According to the CAL FIRE Fire Hazard Severity Zone Viewer Map and the County's GIS service, the project site is located within a LRA (CAL FIRE 2025; County 2025). Within the project site, 177.7-acres lie within an area mapped as Moderate FHSZ in the LRA along the fence's western and northern edge. The remaining acres within the fenced area are not designated as wildlands, indicating that CAL FIRE evaluated the area under its non-wildland (urban/developed) framework rather than as a fuels-driven wildland.

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.8, *Hazards and Hazardous Materials*, of the REGPA PEIR, with implementation of Mitigation Measures HAZ-1, HAZ-2, and HAZ-4, impacts related to hazards and hazardous materials would be less than significant.

Discussion of Project Impacts

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that depending on the nature and extent of solar facilities and operations, the transport, use/storage and disposal of hazardous materials may be required. While the exact nature and location of proposed facilities have not been identified as previously noted, the transport, use/storage and disposal of hazardous materials (including activities associated with facility closure and decommissioning) would be subject to applicable federal, State, and local regulatory requirements. Based on mandatory conformance with associated regulatory standards as described, potential hazardous material impacts related to solar facility operation would be less than significant.

Impacts from the Proposed Project

The proposed project would include construction, operation, and maintenance of a 2,400-acre utility scale solar PV energy generating facility. Materials typically used for O&M of the project may include materials classified as hazardous. Hazardous materials use, storage, and disposal would be in accordance with the project's Hazardous Materials and Waste Management Plan (plan) and would comply with applicable local, State, and federal environmental laws and regulations. The plan identifies hazardous materials that would be used, stored, or transported and establishes inspection procedures, storage requirements, storage quantity limits, inventory control, non-hazardous product substitutes, and disposal of excess materials. The plan also identifies requirements for notices to federal and local emergency response authorities and includes emergency preparedness and response plans, including spill response. Accidental releases of hazardous materials would be prevented or minimized through proper containment of these substances during transportation to the site, storage on-site, and use. Hazardous waste would be removed and disposed of off-site in an appropriately permitted disposal facility.

Hazardous substances or hazardous wastes that are oil or mixed with oils are subject to SPCC rule requirements and would be managed according to a project SPCC Plan for project O&M. The SPCC Plan would be supplemented by other plans, as necessary, describing control and response procedures for other hazardous materials or wastes regulated by the Resource Conservation and Recovery Act and not included in the SPCC Plan. Additionally, project decommissioning would be completed, including reclamation, in compliance with all applicable federal, State, and local requirements, as outlined in the Reclamation Plan.

Preparation of a Hazardous Materials and Waste Management Plan and an SPCC Plan as well as compliance with all regulatory standards would ensure the proposed project does not create a significant hazard to the public and environment related to the routine transport, use, or disposal of hazardous materials.

Therefore, the impact for questions a) and b) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

c) Would the project be located on a site which is included on a list of hazardous materials sites and, as a result, would it create a significant hazard to the public or the environment?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that no mapped or listed hazardous material sites are located within the Charleston View SEDA or potential off-site transmission line corridor. Two "case closed" leaking underground storage tank (LUST) sites are listed just south of the southeastern SEDA boundary. However, because the exact nature and location of development within the SEDA and potential off-site corridor have not been identified, the associated site-specific effects related to hazardous material sites would be potentially significant. Mitigation Measure HAZ-1, which requires the preparation of a Phase I ESA, would be implemented. With implementation of Mitigation Measure HAZ-1, the impact would be less than significant.

Impacts from the Proposed Project

The proposed project would be located in the Charleston View SEDA in southeastern Inyo County, California. Two of the primary hazardous material database sites in California are the SWRCB GeoTracker and California DTSC EnviroStor (Government Code 65962.5/Cortese) lists. Based on the results of the databases reviewed, the project site is not located on a hazardous contamination site (SWRCB 2025, DTSC 2025). According to the CalGEM Online Mapping System, the project site does not lie within the administrative boundaries of an oil field, and no oil or gas wells are located on the project site (Ninyo & Moore 2024). Additionally, the County Department of Environmental Health (IDCEH) was contacted regarding hazardous materials or hazardous waste records associated with the project site and the County noted that no files or records were available for the project site (Ninyo & Moore 2024). Based on review of historical resources, including historical aerial photographs, historical topographic maps, land use records, and interviews with property representatives, it was determined that the project site was unimproved, undeveloped, and vacant with desert vegetation dating back to at least 1953 (Ninyo & Moore 2024).

A Phase I ESA was prepared by Ninyo & Moore for the proposed project (Appendix K). As outlined in the Phase I ESA, no evidence of RECs, Historical RECs (HREC), or Controlled RECs (CREC) were associated with the project site, and no evidence of RECs was identified for the adjoining or nearby properties. Therefore, no further investigation is recommended.

As a Phase I ESA was prepared, REGPA PEIR Mitigation Measure HAZ-1 has been satisfied for the proposed project.

Therefore, the impact would be less than significant, and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

d) For a project within the vicinity of an airport land use plan or, where such a plan has not been adopted within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing in the project area?

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the vicinity of the project area?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the Charleston View SEDA and potential off-site transmission line corridor are located approximately 1.1-miles from the closest airport. While potential project-related development would be limited to approximately 13 percent of the SEDA as noted above, the exact nature and location of this development (and the potential transmission line) have not been identified. As a result, site-specific effects from airport-related hazards would be potentially significant. Mitigation Measure HAZ-2, which requires the preparation of a site-specific Airport Safety Investigation, would be implemented. With implementation of Mitigation Measure HAZ-2, the impact would be less than significant.

Impacts from the Proposed Project

Sky Ranch Airport is located approximately 18-miles south of the project site in Sandy Valley. Hidden Hills Airport is located 1.3-miles northeast of the project site. However, this airport was abandoned about 15-years and was removed from the JEPP charts. Therefore, Hidden Hills Airport is not an officially recognized airport, according to the FAA (Appendix D). Additionally, as outlined in Chapter 4.0, Project Description, electrical connection lines and structural design for the proposed project would adhere to FAA, International Civil Aviation Organization, and APLIC guidelines to avoid avian electrocutions and minimize collision potential. As the proposed project is not located within the vicinity of an active airport or private airstrip, REGPA PEIR Mitigation Measure HAZ-2 would not be applicable to the proposed project.

Therefore, the impact for questions d) and e) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

f) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that because the Charleston View SEDA is located approximately 5-miles from the closest school site, associated potential impacts related to the use or emission of hazardous materials or wastes would be less than significant.

Impacts from the Proposed Project

There are no schools located within the project vicinity. The nearest school to the project site is Hafen Elementary School, located approximately 6.9-miles northeast of the project site at 7120 Hafen Road in Pahrump, Nevada. As the proposed project is not located within one-quarter mile of an existing or proposed school, REGPA PEIR Mitigation Measure HAZ-3, which requires the preparation of a site-specific School Safety Investigation, would not be applicable to the proposed project.

Therefore, the impact would be less than significant, and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

g) Would the project physically interfere with an adopted emergency response plan or emergency evacuation plan?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that while the specific nature and location of proposed facilities within the Charleston SEDA are not currently known, it is assumed that project solar development would not be located within roadway right-of-way (ROW). Potential impacts associated with construction-related encroachment into evacuation route ROW for the Charleston View SEDA (and the potential off-site transmission line) would be less than significant.

Impacts from the Proposed Project

The project site is surrounded by open space in all directions. The project site is adjacent to the Nevada state line and Tecopa Road/Old Spanish Trail Highway, is located approximately 0.25-mile south of the project site. It is anticipated that the proposed project would not be located within roadway ROW, and that an encroachment permit would not be required. Primary evacuation routes in the County consist of the major streets and highways within the County, as well as the interstate freeway system and State routes. Alternate evacuation routes in the County also include major surface streets, with the best routes to be determined at the time of the incident based on-site and event-specific conditions. It is anticipated that major streets and highways within the County may be used during construction and operation of the proposed project. A Traffic Management Plan, as required under REGPA PEIR Mitigation Measure TRA-1, would be prepared to avoid disruptions or delays in access for emergency vehicles and to notify emergency service providers of any road or traffic conditions that may impede emergency access.

With implementation of REGPA PEIR Mitigation Measure TRA-1, the impact would be less than significant, and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the Charleston View SEDA is rated as moderate for wildfire hazards by CAL FIRE. The occurrence of wildfires within the SEDA (and the potential off-site transmission line) could potentially expose people and/or structures to related hazards and associated potential impacts would be significant. Mitigation Measure HAZ-4, which requires the preparation of a site-specific Wildfire Safety Investigation, would be implemented. With implementation of Mitigation HAZ-4, the impact would be less than significant.

Impacts from the Proposed Project

According to the CAL FIRE Fire Hazard Severity Zone (FHSZ) Viewer Map and the County's geographic information systems (GIS) service, the project site is located within a LRA (CAL FIRE 2025; County 2025). Within the project site, 177.7-acres lie within an area mapped as Moderate FHSZ in the LRA along the fence's western and northern edge. The remaining acres within the fenced area are not designated as wildlands, indicating that CAL FIRE evaluated the area under its non-wildland (urban/developed) framework rather than as a fuels-driven wildland. The closest High FHSZ is 2.3-miles southeast of the O&M building. As a portion of the project site is mapped as Moderate FHSZ in the LRA, a Wildfire Safety Investigation Memorandum (Appendix L) was prepared. As outlined in the Wildfire Safety Investigation Memorandum, no further wildfire analysis would be needed given the following characteristics of the project:

1. The limited extent of the mapped Moderate FHSZ overlaps within the fence line.
2. The setback of 50-feet from the fenceline for PV and equipment installation.
3. The lack of High or Very High zones in the vicinity of the project site.
4. The absence of a battery energy-storage system, which reduces the risk of fire.
5. The project's location is on the desert floor, which has more favorable climatic conditions (e.g., less wind) than nearby mountainous areas.
6. The desert-shrub vegetation mosaic with patchy fine fuels, which would be proactively managed per the Habitat Restoration, Vegetation, and Noxious Weed Management Plan to be approved by the County.

Additionally, fire prevention and suppression procedures would be provided in the Emergency Response Plan and would address potential fire sources and appropriate safety and fire prevention measures. Project-specific fire prevention and suppression procedures would include vehicle exhaust systems, fueling operations, smoking, electrical work, and on-site flammable liquid storage. Fire suppression, emergency preparedness, and emergency notification and follow-up procedures would be addressed, and other measures such as carrying fire extinguishers and shovels would be incorporated into the procedures. It is anticipated that fire response to the project site would come from the Southern Inyo FPD in Tecopa (25-miles/45-minutes) or from Pahrump, Nevada.

As a Wildfire Safety Investigation Memorandum was prepared, REGPA PEIR Mitigation Measure HAZ-4 has been satisfied for the proposed project.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

See Section 5.XVII, Transportation and Circulation, for REGPA PEIR Mitigation Measure TRA-1.

IX. HYDROLOGY AND WATER QUALITY

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:				
a) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒
b) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
c) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
d) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
e) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
f) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level?	☐	☐	☐	☒
g) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality?	☐	☐	☐	☒

A Hydrology and Water Quality Assessment was prepared on October 15, 2026, by ERM and is incorporated and included as Appendix M to this IS/Addendum. A Water Supply Assessment was prepared in October 2026, by ERM and is incorporated and included as Appendix N to this IS/Addendum. A Drainage Report was prepared by Stantec on February 6, 2026, and is incorporated and included as Appendix O to this IS/Addendum.

Environmental Setting

Watershed and Drainage Characteristics

The County is located within the South Lahontan Basin, as designated in the 1995 (as amended) Lahontan RWQCB Water Quality Control Plan for the Lahontan Region (Basin Plan). The majority of the

Charleston View SEDA is located within the Pahrump Hydrologic Unit (HU; 610.00), with the southwestern portion of the SEDA within the California Valley hydrologic subareas (HAS; 609.44) and Amargosa Desert hydrologic area (HA) of the Amargosa HU. Surface drainage in the noted hydrologic designations (and the Charleston View SEDA) is variable in direction with topography, and occurs through a number of unnamed ephemeral washes, including several large washes in Pahrump Valley, and as overland flow. All of these flows are internal and terminate at one or more local playas, including Stewart Dry Lake. Average annual precipitation in the site vicinity (Pahrump, Nevada) is approximately 5.1-inches, with the majority (approximately 62 percent) occurring during the period of November through March (County 2015).

Flood Hazards

The Federal Emergency Management Agency (FEMA) provides information on flood hazard and frequency for cities and counties on its Flood Insurance Rate Maps (FIRMs). The majority of the project area is located within Flood Zone X, area of minimal flood hazard; however, a small portion of the northern end of the project area is located within a FEMA Special Flood Hazard Area (SFHA) Zone A, which are areas within a 1 percent annual chance of flooding. However, the project does not propose any improvements nor grading within the FEMA Zone A (Stantec 2026).

Groundwater

The majority of the Charleston View SEDA is located within the areal extent of the Pahrump Valley Groundwater Basin, with the southwestern portion of the SEDA within the California Valley Basin (Basin Nos. 6-28 and 6-79, respectively). The Pahrump Valley Basin includes an area of approximately 93,100-acres, with the primary water-bearing strata consisting of a thick (at least 800 feet) sequence of unconsolidated younger alluvial fan deposits and underlying (locally semi consolidated) older alluvium. Total estimated storage capacity is approximately 690,000-acre-feet, with local groundwater levels in the site vicinity of approximately 130-feet below the surface. The California Valley Basin includes an area of approximately 58,300-acres, with the primary water-bearing strata consisting of Quaternary alluvium (including younger alluvium underlain by older and locally poorly consolidated older alluvial deposits). Groundwater storage capacity is unknown, with historic (1942-1953) water table levels of between 8 and 42-feet below the surface and no known current data available (County 2015).

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.9, *Hydrology and Water Quality*, of the REGPA PEIR, with implementation of Mitigation Measure HYD-1 through HYD-3, potential impacts associated with hydrology and water quality would be less than significant.

Discussion of Project Impacts

a) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

b) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that while overall drainage and flow pattern alterations are not anticipated to be substantial, associated potential impacts to individual drainage courses and channels are unknown and could potentially result in significant impacts related to local channel or wash diversion and associated erosion and/or flooding issues. Solar development typically does not encompass extensive areas of new impervious surfaces (which increase runoff rates and amounts), with such areas generally limited to locations including concrete pads and foundations for substation facilities, solar panel support posts, and associated structures (e.g., small maintenance/ storage buildings). However, Mitigation Measure HYD-1, which requires the preparation of a site-specific hydrologic analyses, Mitigation Measure HYD-2, which requires the preparation of a site-specific groundwater analyses, and Mitigation Measure HYD-3, which requires the preparation of site-specific water quality analyses, would be implemented to assess pre- and pose-development runoff rates. With implementation of Mitigation Measure HYD-1 through Mitigation Measure HYD-3, the impact would be less than significant.

Impacts from the Proposed Project

A Hydrology and Water Quality Assessment, Water Supply Assessment, and Preliminary Drainage Report were prepared for the proposed project (included as Appendices M, N, and O, respectively). As outlined in the Hydrology and Water Quality Assessment, minimal grading would occur primarily at the substation, the O&M building sites, and the interior project roads. As the proposed construction is minimal relative to the total project area, it is not anticipated that the drainage pattern would not be substantially altered.

Construction activities that require more than one acre of ground disturbance are regulated by the Lahontan RWQCB and are subject to the requirements of the NPDES General Construction Permit, including preparation and implementation of a SWPPP during construction. The SWPPP must include details of how the sediment and erosion control BMPs would be implemented. As the proposed project would disturb greater than once acre, the proposed project would be subject to NPDES requirements and would be required to prepare and implement a SWPPP including BMPs to reduce soil erosion during construction activities.

Additionally, the proposed project would be required to adhere to the provisions of the CBC and the County Grading Ordinance, in which erosion control would be required for grading or filling or stripping of vegetation. Therefore, the project would not substantially alter the existing drainage pattern of the site or area, nor would it create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

As a Hydrology and Water Quality Assessment, Water Supply Assessment, and Preliminary Drainage Report were prepared, REGPA PEIR Mitigation Measure HYD-1, REGPA PEIR Mitigation Measure HYD-2, and REGPA PEIR Mitigation Measure HYD-3 have been satisfied for the proposed project.

The impact would be less than significant for questions a) and b) and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

c) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

d) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that several mapped 100-year floodplains are located within or adjacent to the Charleston View SEDA. Because no permanent housing is proposed as part of the project development, no associated impacts related to locating such structures within flood hazard areas would result from project implementation. However, because the exact locations of the noted facilities have not been identified, however, associated site-specific effects related to floodplains and flood flows cannot be determined. As a result, associated potential effects are unknown and could potentially result in significant impacts related to the location of facilities within mapped floodplains and associated effects such as impeding or redirecting flood flows. Mitigation Measure HYD-1, Mitigation Measure HYD-2, and Mitigation Measure HYD-3 would be implemented to assess flooding and flood flows. With implementation of Mitigation Measure HYD-1 through Mitigation Measure HYD-3, the impact would be less than significant for questions c) and d).

Impacts from the Proposed Project

A Hydrology and Water Quality Assessment, Water Supply Assessment, and Preliminary Drainage Report were prepared for the proposed project. As outlined in the Hydrology and Water Quality Assessment, the majority of the project area is located within Flood Zone X, area of minimal flood hazard; however, a small portion of the northern end of the project area is located within a FEMA SFHA Zone A, which are areas within a 1 percent annual chance of flooding. However, the project does not propose any improvements nor grading within the FEMA Zone A (Stantec 2026). As no permanent housing is proposed as part of the proposed project, no associated impacts related to locating such structures within flood hazard areas would result from project implementation.

As a Hydrology and Water Quality Assessment, Water Supply Assessment, and Preliminary Drainage Report were prepared, REGPA PEIR Mitigation Measure HYD-1, REGPA PEIR Mitigation Measure HYD-2, and REGPA PEIR Measure HYD-3 have been satisfied for the proposed project.

The impact would be less than significant for questions c) and d) and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

e) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or inundation by seiche, tsunami, or mudflow?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that potential impacts related to dam inundation at the Charleston View SEDA would be less than significant. Additionally, associated potential impacts related to the capacity of existing or planned storm drain systems are expected to be less than significant. Mitigation Measure HYD-1, Mitigation Measure HYD-2, and Mitigation Measure HYD-3 would be implemented to assess flooding. With implementation of Mitigation Measure HYD-1 through Mitigation Measure HYD-3, the impact would be less than significant.

Impacts from the Proposed Project

A Hydrology and Water Quality Assessment, Water Supply Assessment, and Preliminary Drainage Report were prepared for the proposed project. As outlined in the Hydrology and Water Quality Assessment, the majority of the project area is located within Flood Zone X, area of minimal flood hazard; however, a small portion of the northern end of the project area is located within a FEMA SFHA Zone A, which are areas within a 1 percent annual chance of flooding. However, the project does not propose any improvements nor grading within the FEMA Zone A (Stantec 2026). Additionally, the project site is not located near the coast, lake, dam, or large levee and is therefore not at risk of a tsunami or seiche inundation. Therefore, the project would not expose people or structures to a significant risk involving flooding as a result of a failure of a levee or dam, or inundation by seiche, tsunami, or mudflow.

As a Hydrology and Water Quality Assessment, Water Supply Assessment, and Preliminary Drainage Report were prepared, REGPA PEIR Mitigation Measure HYD-1, REGPA PEIR Mitigation Measure HYD-2, and REGPA PEIR Mitigation Measure HYD-3 have been satisfied for the proposed project.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

f) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that because of the extent of such potential groundwater use is unknown, associated effects to local aquifers cannot be determined and are considered potentially significant. Mitigation Measure HYD-1, Mitigation Measure HYD-2, and Mitigation Measure HYD-3 would be implemented to assess groundwater supplies and groundwater recharge. With implementation of Mitigation Measure HYD-1 through Mitigation Measure HYD-3, the impact would be less than significant.

Impacts from the Proposed Project

A Hydrology and Water Quality Assessment, Water Supply Assessment, and Preliminary Drainage Report were prepared for the proposed project. As outlined in the Hydrology and Water Quality Assessment, the water demand for this project includes both temporary demands during construction and decommissioning, as well as demand for long-term operation of the solar facility. The project site overlies the Pahrump Valley Groundwater Subbasin (Basin 6-028) and is located approximately two miles north of the Mesquite Valley Groundwater Basin (Basin 6-029). The project's groundwater supply would come from the Pahrump Valley Groundwater Basin. During the total 18-month construction region the project would use an estimated 1,085 acre-feet of water. The main activity during construction that produces a water demand is dust suppression during ground-disturbing activities. The estimated water demand during the 50-year operational life of the project for normal O&M activities is 0.014 AFY. Decommissioning is anticipated to require water, with a significant portion of the demand driven by dust suppression during ground-disturbing activities. Exact volumes have not yet been determined due to the uncertainty associated with, and the extended time frame before any decommissioning would occur (after the useful life of the project). A draft Reclamation Plan was prepared in September 2026; however, a detailed, project-specific decommissioning and reclamation plan will be developed and approved prior to the start of decommissioning activities.

The project would include minimal new impervious surfaces associated with access roads, PV solar arrays, and pads for the substation. Additionally, during the final design phase, the project will evaluate the remaining Groundwater Recharge Capacity measures outlined in Mitigation Measure HYD-2 and implement appropriate strategies as necessary. As such, with implementation of REGPA PEIR Mitigation Measure HYD-2, the project would not substantially interfere with groundwater recharge.

As a Hydrology and Water Quality Assessment and a Water Supply Assessment were prepared, REGPA PEIR Mitigation Measure HYD-1 and REGPA PEIR Mitigation Measure HYD-3 have been satisfied for the proposed project.

With implementation of Mitigation Measure HYD-2, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

g) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that potential water quality impacts from solar facility development are associated with both short-term construction activities and long-term operation and maintenance. Potential short-term construction activity impacts would be less than significant based on mandatory project conformance with applicable regulatory requirements including the NPDES Construction General Permit and related County standards. Potential long-term operational impacts would be potentially significant. However, Mitigation Measure HYD-1, Mitigation Measure HYD-2, and Mitigation Measure

HYD-3 would be implemented to assess water quality. With implementation of Mitigation Measure HYD-1 through Mitigation Measure HYD-3, the impact would be less than significant.

Impacts from the Proposed Project

A Hydrology and Water Quality Assessment, Water Supply Assessment, and Preliminary Drainage Report were prepared for the proposed project. As outlined in the Hydrology and Water Quality Assessment, the potential for water quality impacts from runoff will be limited to short-term construction, restoration, or decommissioning periods. Construction activities that require more than one acre of ground disturbance are regulated by the Lahontan RWQCB and are subject to the requirements of the NPDES General Construction Permit, including preparation and implementation of a SWPPP during construction. The SWPPP must include details of how the sediment and erosion control BMPs would be implemented. As the proposed project would disturb greater than once acre, the proposed project would be subject to NPDES requirements and would be required to prepare and implement a SWPPP including BMPs to limit the impacts of erosion, construction related impacts, and potential degradation of water quality.

Construction activities also have the potential to substantially impact groundwater quality due to the accidental release of hazardous materials during construction and decommissioning activities. However, as outlined in Section 5.VIII, Hazards and Hazardous Materials, a Hazardous Materials and Waste Management Plan and an SPCC Plan would be prepared to minimize degradation of groundwater quality due to release of hazardous materials. Additionally, as outlined in the Water Supply Assessment, the quality of the groundwater in the Pahrump Valley Groundwater Basin is suitable for all beneficial uses. Therefore, the project would not violate any water quality standards or otherwise substantially degrade water quality.

A Hydrology and Water Quality Assessment, Water Supply Assessment, and Preliminary Drainage Report, REGPA PEIR Mitigation Measure HYD-1, REGPA PEIR Mitigation Measure HYD-2, and REGPA PEIR Mitigation Measure HYD-3 have been satisfied for the proposed project.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

The following Mitigation Measure from the REGPA EIR is applicable to the proposed project, as indicated in the discussion above.

REGPA PEIR MM HYD-2: Conduct site-specific groundwater investigations.

Site-specific groundwater investigations will be completed for all proposed solar facility development projects within the individual SEDAs and the OVSA proposing to utilize groundwater resources, prior to final project design approval. These investigations will identify site-specific criteria related to considerations such as local aquifer volumes and hydrogeologic characteristics, current/proposed withdrawals, inflow/recharge capacity, and potential effects to local aquifer and well levels, as well as effects to groundwater-dependent surface water features including springs, marshes and bosques, from proposed project withdrawals. All applicable results and recommendations from these investigations will be incorporated into the associated individual project design documents to address identified

potential impacts to groundwater resources (per applicable regulatory standards), with all related requirements to be included in associated engineering/design drawings and construction contract specifications. A summary of the types of remedial measures typically associated with identified potential effects to groundwater and related surface water resources is provided below. The remedial measures identified/recommended as part of the described site-specific groundwater investigations will take priority over the more general types of standard measures listed below.

- Aquifer/Well drawdown: (1) monitor local aquifer and private/production well levels to verify the presence or absence of project-related effects during pre-construction, construction, and operation periods (based on a methodology and monitoring schedule approved by the RWQCB and County); (2) document background and pre-construction groundwater conditions and comparable project-related construction and operation trends, along with related factors such as precipitation levels and groundwater budgets; (3) prepare scaled maps depicting the associated site(s), existing and proposed monitoring well locations, relevant natural (e.g., springs and groundwater-dependent vegetation) and other features (e.g., reservoirs), and pre-post-project groundwater contours, along with a description of cumulative water level changes; (4) restrict project-related groundwater withdrawals to appropriate levels to avoid significant adverse effects to local aquifers/wells and/or other groundwater-dependent uses (e.g., vegetation, springs or other related surface water features), based on thresholds approved by the RWQCB and County; and, (5) provide mitigation for affected wells or other uses/resources where applicable, potentially including well modifications (e.g., deepening pumps or wells), and/or financial compensation, and compensatory mitigation for impacts to groundwater dependent surface water features and habitats.

- Groundwater Recharge Capacity: (1) reduce the area of on-site impervious surface if appropriate, through increased use of surfacing materials such as gravel, decomposed granite, or pervious pavement; and, (2) use facilities such as retention/percolation basins and unlined drainage facilities to increase local infiltration and groundwater recharge. The County may employ water injection as a method of groundwater recharge as deemed appropriate on a case by case basis. This decision would be made during project specific CEQA analysis for a given solar energy development proposal.

X. LAND USE AND PLANNING

		New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:					
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Conflict with any regional land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Environmental Setting

The Charleston View SEDA is approximately 39,697-acres (62-square miles). About 41 percent of the land within this SEDA is privately owned. The remaining 59 percent is managed by the BLM, with a large portion of BLM land used for grazing allotment (County 2015).

The project site is located on private land currently designated by the County as Open Space and Recreation and is zoned by the County as OS-40. The OS-40 zoning designation provides sites for open space and compatible uses. Commercial renewable energy facilities are an allowable use within the OS-40 land use zoning district (County 2002). The project site is predominately flat, arid, and sparsely vegetated with elevations that range from 2,500- feet to 2,660-feet amsl. The project site includes existing dirt roads and abandoned buildings. The project location was selected based on a number of factors including its frequent clear sky conditions, very high solar resource availability, and access to the bulk electricity transmission system.

The project site is surrounded by open space in all directions. The project site is adjacent to the Nevada state line and Tecopa Road/Old Spanish Trail Highway., is located approximately 0.25-mile south of the project site. A small amount of commercial and residential zoning is present directly south of the project area in Charleston View, and an existing solar facility (Yellow Pine Energy Center) is located east of the project area in Nevada at the proposed transmission tie-in location. The closest localities or towns to the project site include Charleston View, California approximately 1-mile to the south; Pahrump, Nevada approximately 25-miles to the north; and Mountain Springs, Nevada approximately 25-miles to the east. The nearest city to the project site is Las Vegas, approximately 57-miles to the east.

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.10, *Land Use and Planning*, of the REGPA PEIR, impacts to land use and planning would be less than significant. No mitigation measures are required.

Discussion of Project Impacts

a) Would the project physically divide an established community?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the future solar energy projects within the SEDAs would be subject to the applicable land use requirements of the County and additional environmental review. As part of this review, each project would be analyzed to determine impacts regarding the physical division of a community. Future development of solar energy projects within the SEDAs would require appropriate siting and are subject to further review and approval from the County. As such, the REGPA would not result in significant impacts associated with the physical division of communities. Therefore, the impact would be less than significant.

Impacts from the Proposed Project

The project site includes existing dirt roads and abandoned buildings. As such, implementation of the project would not result in a physical division of an established community.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

b) Would the project conflict with any regional land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the REGPA would not conflict with the County General Plan, County Zoning Ordinance, County Code Title 21: Renewable Energy Ordinance, Inyo County Airport Land Use Commission Policy Plan and Airport Comprehensive Land Use and Planning (CLUP), Owens Valley Land Management Plan, and Bishop Resource Management Plan. Therefore, the impact would be less than significant.

Impacts from the Proposed Project

Inyo County General Plan and Zoning Ordinance

The project is designated as OSR by the Inyo County General Plan and zoned OS-40. OS-40 zoning designation does not define a solar facility as permitted or conditional use. However, Title 21, Renewable Energy Ordinance, of the Inyo County Municipal Code, governs solar facilities throughout Inyo County and provides requirements and development guidance for solar facilities. The Renewable Energy Ordinance requires applicants for a solar facility to apply for and obtain a REP or a REDA from the County, so long as the facility is not specifically exempt from such requirements by state or federal law,

or if any existing REDA is already in place with the County for the facility (Inyo County Municipal Code Section 21.16.010, and 21.16.030). As outlined in Section 4.5, Required Permits and Approvals, a REP or a REDA would be acquired.

Additionally, to meet the requirements of the REGPA and the Charleston View SEDA, the project site would be no greater than 2,400-acres with a maximum capacity of 500 MW. To date, there are no other renewable energy projects developed or proposed within this SEDA or the Eastern Solar Energy Group. Therefore, no inconsistencies would occur.

Inyo County Code Title 21: Renewable Energy Ordinance

The proposed project would be consistent with Inyo County Code Title 21, and would serve to further support, encourage, and regulate the development of renewable energy sources. Therefore, no inconsistencies would occur.

Inyo County Airport Land Use Commission Policy Plan and Airport CLUP

Sky Ranch Airport is located approximately 18-miles south of the project site in Sandy Valley. Hidden Hills Airport is located 1.3-miles northeast of the project site. However, this airport was abandoned about 15-years and was removed from the JEPP charts. Therefore, Hidden Hills Airport is not an officially recognized airport, according to the FAA (Appendix D). As such, the project would not conflict with a County Airport Land Use Commission Policy Plan and Airport CLUP, and no inconsistencies would occur.

The proposed project is not located within the Owens Valley Land Management Plan area and therefore, would not be subject to the Owens Valley Management Plan. Additionally, the project is not located on BLM-managed lands and therefore, would not be subject to the Bishop Resource Management Plan.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the implementation of the REGPA would be consistent with the regionally occurring HCPs, if approved. Therefore, the impact would be less than significant.

Impacts from the Proposed Project

The project site is located within the DRECP Planning Area Boundary. In 2016, BLM signed its Record of Decision approving the DRECP Land Use Plan Amendment, which covers the 10 million acres of BLM-managed lands in the DRECP Plan Area (BLM 2025). In 2022, the BLM and CDFW signed a 2022 amendment to the Durability Agreement and Co-Management Plan, which is a key conservation agreement that provides innovative tools to manage impacts to wildlife and their habitats in California. The JB Eastern Slope Mitigation Lands is the first state-required mitigation project on BLM-managed

public lands in the California Desert Conservation Area. These lands encompass 158,000-acres that will be restored to improve habitat for desert Tortoise, Mohave ground squirrel, burrowing owl and the American badger. The proposed project would be located on private land within the DRECP; however, the project would not be located on BLM-managed land. As the project is not located on BLM-managed land, the project would not be subject to DRECP.

Additionally, the project is anticipating to obtain an ITP under the USFWS General Conservation Plan for the Desert Tortoise of California, and coordination with USFWS is ongoing. The project would comply with the applicable requirements of the USFWS General Conservation Plan for the Desert Tortoise of California.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

No Mitigation Measures from the REGPA PEIR are applicable to the proposed project related to land use and planning.

XI. MINERAL RESOURCES

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No new Impact
Would the project result in:				
a) The loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
b) The loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Environmental Setting

The County is located within the Basin and Range Geomorphic Province, with this region historically producing substantial amounts of mineral resources such as base and precious metals (e.g., gold, silver and copper). The County includes extensive occurrences of known and potential mineral resources, along with associated past and current mineral production (County 2015).

The occurrence of mineral resources was an important factor in much of the early settlement within the County, and mining operations remain a substantial, albeit declining, local industry. Currently, aggregate resources (e.g., sand, gravel, clay and stone) represent the predominant mining activity in the County, although development of other mineral resources such as base and precious metals, borates, volcanic materials (e.g., pumice, perlite, and cinders) and geothermal resources are occurring in various locations. A number of studies on mineral resource occurrences and potential have been conducted for areas within the County, including efforts by the USGS, BLM, CGS, and South Coast Geological Society, and are described in Section 4.11, Mineral Resources, of the REGPA PEIR (County 2015).

The Charleston View SEDA exhibits a generally moderate potential for the occurrence of recoverable aggregate minerals (sand and gravel), a low to moderate potential for base and precious metals, and a low potential for other mineral types. Specifically, the SEDA is located within an area encompassing thick deposits of Quaternary alluvium, alluvial fan and lake deposits, with older Quaternary sediments, Quaternary volcanics, and Paleozoic metasedimentary rocks in adjacent areas (and presumably underlying the site at depth). Specifically, these include areas in the White and Inyo Mountains to the east, and Sierra Nevada to the west identified as exhibiting known or inferred occurrences of minerals such as base and precious metals, talc, and tungsten (USGS 2014; CGS 1993a). The conclusions were also based on the following considerations: (1) portions of the Charleston View SEDA expose a mix of Precambrian/Paleozoic metasedimentary rocks that could potentially encompass mineral resources such as base and precious metals as previously described (i.e., the “panhandle” area in the southwestern portion of the SEDA); (2) while numerous base and precious metal deposits (including known production sites) occur in surrounding areas (including portions of the Nopah Range, northern Pahrump Valley, the Kingston Range and the Tecopa area), the portion of the Charleston View SEDA within Pahrump Valley is identified as having “no known mineral occurrences” for base and precious metals (i.e., land classified as Mineral Resource Zone [MRZ]-4); and, (3) portions of the Charleston View SEDA within Pahrump Valley

are identified as exhibiting "inferred mineral occurrences" (MRZ-3) for sodium compounds, although these potential resources are also described as exhibiting low mineralization density, no production history, and a low potential for undiscovered resources (County 2015, CGS 1993b).

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.11, *Mineral Resources*, of the REGPA PEIR, with implementation of MIN-1, impacts related to mineral resources would be less than significant.

Discussion of Project Impacts

a) Would the project result in the loss or availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that construction of solar facilities in the Charleston View SEDA could result in a potentially significant impact related to the loss or availability of mineral resources in Inyo County since the analysis used to make the REGPA PEIR conclusion is considered preliminary. However, Mitigation Measure MIN-1, which requires a site-specific mineral resource investigation, would be implemented to reduce potential mineral resource impacts. Therefore, with implementation of MIN-1, impacts related to mineral resources would be less than significant.

Impacts from the Proposed Project

According to the Mineral Land Classification Map for the Ash Meadows, Big Dune, Eagle Mountain, Funeral Peak, Tyan, Pahrump, and Stewert Valley 15-Minute Quadrangles, the proposed project would be located within MRZ-4, land classified as having "no known mineral occurrences" for base and precious metals (DOC 1986). Additionally, according to the Division of Mine Reclamation All Mines viewer, no active mines are located within the Charleston View SEDA (DOC 2025c). Therefore, as no known mineral resources or mineral resource recovery site are located within the proposed project site, REGPA PEIR Mitigation Measure MIN-1, which requires a mineral resources investigation, would not be applicable to the project.

Therefore, the impact for questions a) and b) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

No Mitigation Measures from the REGPA PEIR are applicable to the proposed project related to mineral resources.

XII. NOISE

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No new Impact
Would the project result in:				
a) Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b) Expose persons to or generate excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) Substantially, permanently increase ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) Substantially, temporarily, or periodically increase ambient noise levels in the project vicinity existing without the project?	☐	☐	☐	☒
e) Expose people residing or working in the project area to excessive noise levels if the project is located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport?	☐	☐	☐	☒
f) For a project within the vicinity of a private air strip, expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Environmental Setting

Existing Noise Environment

There are no major sources of noise or vibration currently located within the Charleston View SEDA. Sky Ranch Airport is located approximately 18-miles south of the project site in Sandy Valley. Hidden Hills Airport is located 1.3-miles northeast of the project site. However, this airport was abandoned about 15-years and was removed from the JEPP charts. Therefore, Hidden Hills Airport is not an officially recognized airport, according to the FAA (Appendix D).

Noise-Sensitive Land Uses

Noise-sensitive land uses (NSLU) are land uses that may be subject to stress and/or interference from excessive noise, including residences, hospitals, schools, hotels, resorts, libraries, sensitive wildlife habitats, or similar facilities where quiet is an important attribute of the environment. Noise receptors (receivers) are individual locations that may be affected by noise. There are no NSLUs within 500-feet of the project site. There are no hospitals or other non-residence sensitive receptors within the Charleston

View SEDA. The closest existing NSLUs to the project site is a residence located approximately 800-feet south of the project site.

Noise Metrics

All noise-level and sound-level values presented herein are expressed in terms of decibels (dB), with A weighting, abbreviated "dBA," to approximate the hearing sensitivity of humans. Time averaged noise levels of one hour are expressed by the symbol "L_{EQ}" unless a different time period is specified. Maximum noise levels are expressed by the symbol "L_{MAX}." Some of the data also may be presented as octave-band-filtered and/or A-octave band-filtered data, which are a series of sound spectra centered on each stated frequency, with half of the bandwidth above and half of the bandwidth below, the stated frequency. These data are typically used for machinery noise analysis and barrier-effectiveness calculations. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and sound levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. This is similar to the Day Night sound level (L_{DN}), which is a 24-hour average with an added 10 dBA weighting on the same nighttime hours but no added weighting on the evening hours.

Because decibels are logarithmic units, S_{PL} cannot be added or subtracted through standard arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than from one source under the same conditions. For example, if one automobile produces an S_{PL} of 70 dBA when it passes an observer, two cars passing simultaneously would not produce 140 dBA—rather, they would combine to produce 73 dBA. Under the decibel scale, three sources of equal loudness together produce a sound level 5 dBA louder than one source.

Under controlled conditions in an acoustic laboratory, the trained, healthy human ear is able to discern 1 dBA changes in sound levels, when exposed to steady, single-frequency ("pure-tone") signals in the mid-frequency (1,000 Hertz [Hz]–8,000 Hz) range. In typical noisy environments, changes in noise of 1 to 2 dBA are generally not perceptible. It is widely accepted, however, that people begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5 dBA increase is generally perceived as a distinctly noticeable increase, and a 10 dBA increase is generally perceived as a doubling of loudness.

Vibration Metrics

Ground-borne vibration consists of rapidly fluctuating motions or waves transmitted through the ground with an average motion of zero. Sources of ground-borne vibrations include natural phenomena and anthropogenic causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions). Peak particle velocity (PPV) is commonly used to quantify vibration amplitude. The PPV, with units of inches per second (in/sec), is defined as the maximum instantaneous positive or negative peak of the vibration wave.

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.12, *Noise*, of the REGPA PEIR, with implementation of Mitigation Measures NOI-1, Mitigation Measure NOI-2, and NOI-3, impacts associated with noise would be less than significant.

Discussion of Project Impacts

a) Would the project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that solar projects have the potential to generate operational noise that would exceed noise levels in the General Plan Noise Element from equipment noise, washer stations, power generators, and maintenance activities. Noise impacts would be dependent on the size, location, and proximity to NSLUs. However, since details regarding specific projects are unknown at this time, impacts are considered potentially significant. In the event the solar facility is located within 500 feet of a NSLU, a technical noise report would be prepared, as required under Mitigation Measure NOI-1.

Impacts from the Proposed Project

The County does not have established quantitative significance thresholds to determine construction and operational impacts for noise or vibration. As outlined above, there are no NSLUs within 500-feet of the project site. There are no hospitals or other non-residence sensitive receptors within the Charleston View SEDA. The closest existing NSLUs to the project site is a residence located approximately 800-feet south of the project site. As there are no NSLU within 500-feet of the project site, REGPA PEIR Mitigation Measure NOI-1, which requires preparation of a technical noise report, would not be applicable to the proposed project.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

b) Would the project expose persons to or generate excessive groundborne vibration or groundborne noise levels?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that groundborne vibration impacts from project construction and operation would be considered less than significant.

Impacts from the Proposed Project

Construction Impacts

As outlined in Section 4.4, Construction, construction of the solar facility would commence as early as January 2027. The proposed project will occur over two regions within an approximately 18-month construction period. On-site vibration generation could occur from the construction of the solar PV system. Additionally, off-site activities, including construction-related delivery trucks and construction worker vehicles, have the potential to expose vibration-sensitive land uses located near the delivery route to excessive vibration. Vibration dissipates rapidly with distance. Given the rural nature of the

County, vibration generated from the types of construction-related equipment and trucks that would be typically expected for construction of solar project would not be expected to occur within a range that would exceed the FTA building damage threshold level of 0.2 inch per second PPV for non-engineered timber and masonry buildings or the threshold of 65 vibration decibels (VdB) for vibration-sensitive uses, or 72 VdB for general annoyance.

Given that construction the proposed project would be short-term and temporary and as the proposed project would be located more than 500-feet from a NSLU, construction impacts associated with groundborne vibration would be less than significant.

Operational Impacts

Heavy-duty trucks traveling to solar energy facilities for routine inspection and maintenance activities could generate vibration. However, such vehicular movements would generate similar vibration levels as existing traffic conditions and would only be periodic. Additionally, the proposed project would be located more than 500-feet from a NSLU. Therefore, operational impacts associated with groundborne vibration would be less than significant.

Impact Conclusion

Construction and operational impacts associated with groundborne vibration would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

c) Would the project substantially, permanently increase ambient noise levels in the project vicinity above levels existing without the project?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that permanent increases in ambient noise levels in surrounding areas would result from noise generated from solar development operations and maintenance. Implementation of the project would periodically increase traffic noise; however, because of the relatively low anticipated number of trips, traffic noise levels are not expected to substantially increase, and impacts would therefore be less than significant. In the event that the solar facility would require helicopters during operation or maintenance, Mitigation Measure NOI-3 would be implemented which requires preparation of a helicopter noise control plan.

Impacts from the Proposed Project

On-site operational noise sources associated with the proposed project include pad-mounted inverters and transformers, substation transformers, tracker array motors, dryers/blowers, transmission lines, a 175-kW generator, and a 20-kW propane-powered generator. The proposed project would include electrical equipment and transmission lines which represent a potential source of corona noise. Corona noise is the audible noise created when energy dissipates from electrically conductive equipment. However, noise from coronal discharge would not represent a substantial increase in noise levels in the vicinity of the project site.

Another source of noise would be related to operations and maintenance of the solar facility. As outlined in the TIA (Appendix P), after construction is completed and the project becomes operational, traffic volumes generated by the proposed project are expected to be negligible. Operation of the solar energy facility would require approximately 6-10 full-time employees. The operations workforce would include off-site facility managers, administrative support, SCADA instrument and PV module technicians, and other monitoring and maintenance personnel. Operational activities would primarily involve periodic deliveries and maintenance. Therefore, the project is not anticipated to result in a significant vehicle miles traveled (VMT) impact due to low long-term operational traffic. Additionally, the use of helicopters would not be required for project operation and maintenance; therefore, REGPA PEIR Mitigation Measure NOI-3, which requires the preparation of a helicopter noise control plan, would not be applicable to the proposed project.

The project would not permanently increase ambient noise levels in the project vicinity, and the impact would be less than significant; there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

d) Would the project substantially, temporarily, or periodically increase ambient noise levels in the project vicinity existing without the project?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that implementation of the project would result in a temporary or periodic increase in ambient noise levels related to construction equipment, activities, and vehicles. If construction of solar energy projects or the transmission lines are located within 500-feet of a NSLU and do not include noise-reducing measures, impacts would be potentially significant. If the solar facility is located within of a NSLU, construction noise reduction measures would be implemented, as required under Mitigation Measure NOI-2.

Impacts from the Proposed Project

As outlined in Section 4.4, Construction, construction of the solar facility would commence as early as January 2027. The proposed project will occur over two regions within an approximately 18-month construction period. As outlined above, there are no NSLUs within 500-feet of the project site. There are no hospitals or other non-residence sensitive receptors within the Charleston View SEDA. The closest existing NSLUs to the project site is a residence located approximately 800-feet south of the project site. As there are no NSLU within 500-feet of the project site, REGPA PEIR Mitigation Measure NOI-2, which requires construction noise reduction measures, would not be applicable to the proposed project.

Given that construction the proposed project would be short-term and temporary and as the proposed project would be located more than 500-feet from a NSLU, the impact would be less than significant; there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

e) Would the project expose people residing or working in the project area to excessive noise levels if the project is located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport?

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that because operations and maintenance personnel would infrequently be on-site, the proximity to an airport or airstrip would not expose workers to excessive noise levels. Therefore, noise impacts related to airports and airstrips would be less than significant.

Impacts from the Proposed Project

As outlined above, there are no major sources of noise or vibration currently located within the Charleston View SEDA. Sky Ranch Airport is located approximately 18-miles south of the project site in Sandy Valley. Hidden Hills Airport is located 1.3-miles northeast of the project site. However, this airport was abandoned about 15-years and was removed from the JEPP charts. Therefore, Hidden Hills Airport is not an officially recognized airport, according to the FAA (Appendix D).

As there are no airports or airstrips within the project vicinity, impacts for questions e) and f) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

No Mitigation Measures from the REGPA PEIR are applicable to the proposed project related to noise.

XIII. POPULATION AND HOUSING

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Setting

According to the 2020 US Census, the population of the County is 19,016 (US Census 2020).

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.13, *Population and Housing*, of the REGPA PEIR, impacts associated with the displacement of existing housing or people would be considered less than significant.

Discussion of Project Impacts

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the REGPA and future solar development projects within the SEDAs would generate the need for temporary housing; however, it would result in a less than significant impact associated with population growth need based on the availability of temporary housing. Impacts would be less than significant and would not require the construction of new housing. Additionally, potential future solar development projects would have minor long-term employment needs associated with management, monitoring, and maintenance of the facilities; however, future solar development projects would not be expected to be significant employment-generating uses. No new housing would be constructed as part of the proposed REGPA or future solar development projects within the SEDAs. As such, impacts associated with growth-inducing impacts would be less than significant.

Impacts from the Proposed Project

Construction Impacts

The proposed project would include construction, operation, and maintenance of a 2,400-acre utility scale solar PV energy generating facility. The project would not include any road improvements beyond adding a gravel road base to the County roads, as needed. As outlined in Section 4.4, Construction, construction of the solar facility would commence as early as January 2027. The proposed project will occur over two regions within an approximately 18-month construction period.

Employment during construction may range up to 450 workers depending on the construction activity. Workers would commute by private vehicle to the site each workday, most likely from cities and towns in Nevada such as Pahrump, located approximately 25-miles from the project area, and Las Vegas, located approximately 60 miles from the project area, due to availability of housing; camping or staying in recreational vehicles will not be allowed on site, or in the local area per Inyo County Code 14.04.040 (Habitation Restrictions). The project applicant would use qualified local and non-local contractors/ subcontractors according to the equipment and personnel needs of the project. Workers would utilize the construction trailers during the workday for office use and site safety briefings; these trailers would be locked at the end of each workday. Workers would bring their own workday food, or a food truck may be provided. Sanitation facilities for the workers would consist of exterior porta-johns and/or sanitation trailers.

As construction would be short-term and temporary, impacts associated with substantial unplanned population growth would be less than significant.

Operational Impacts

As outlined in Section 4.6, Operation and Maintenance, operation of the solar energy facility would require approximately 6-10 full-time employees. The operations workforce would include off-site facility managers, administrative support, SCADA instrument and PV module technicians, and other monitoring and maintenance personnel. The majority of the employees would be full-time throughout the anticipated life of the project. During the first several years of project operations (the warranty period), additional personnel employed by the component manufacturer(s) may be on-site conducting equipment performance monitoring and calibration. Seasonal workers would be on-site to support vegetation management as needed.

It is anticipated that the small, permanent workforce associated with the long-term operation of future solar development projects is likely to be composed, at least partially, by workers already residing in the County. Long-term workers may relocate to the County on a permanent basis, but increases to local population associated with new workers relocating to the County would be small and insignificant compared to the existing population and available housing in the County. No long-term housing would be constructed as part of the project. Therefore, impacts associated with long-term population growth would be less than significant.

Impact Conclusion

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

b) Would the project displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that SEDAs contain existing housing; thus, the potential for displacement of existing housing. However, the County has an overall vacancy rate of approximately 15 percent. Thus, small amount of people who could be displaced as a result of future solar development within the SEDAs would likely be able to find replacement housing within the County. As such, impacts associated with the displacement of existing housing or people would be considered less than significant.

Impacts from the Proposed Project

The project site is located on private, vacant land in the southern portion of Pahrump Valley in Inyo County, California. The project site is predominately flat, arid, and sparsely vegetated. The project site includes existing dirt roads and abandoned buildings. As no occupied buildings are located on the project site, the proposed project would not displace existing housing units nor people and would not require construction of replacement housing elsewhere.

The impact for questions b) and c) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

No Mitigation Measures from the REGPA PEIR are applicable to the proposed project related to population and housing.

XIV. PUBLIC SERVICES

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire Station	☐	☐	☐	☒
ii. Police Protection	☐	☐	☐	☒
iii. Schools	☐	☐	☐	☒
iv. Parks	☐	☐	☐	☒
v. Other Public Facilities	☐	☐	☐	☒

Environmental Setting

Fire Protection

There are six FPD within the boundaries of the County, including the Big Pine FPD, Bishop FPD, Independence FPD, Lone Pine FPD, Olancha Volunteer Fire Department, and Southern Inyo FPD. The FPDs respond to structure fires, wildland fires, medical emergencies, hazardous materials spills, and other emergencies. Additional fire protection services within the County include services provided by state and federal land management agencies on land they manage. These agencies include CAL FIRE, National Parks Service (NPS), US Forest Service (USFS), and BLM (County 2015).

It is anticipated that fire response to the project site would come from the Southern Inyo FPD in Tecopa (25-miles/45-minutes) or from Pahrump, Nevada.

Police Protection

Police protection services within Inyo County are provided by the Inyo County Sheriff's Department (ICSD). The department headquarters are located in Independence with additional posts in Bishop, Lone Pine, Shoshone and Death Valley (County 2015).

The California Highway Patrol (CHP) is a statewide organization with responsibility for law enforcement for state highways and roads. Inyo County is located within the Inland Division of the CHP (County 2015).

It is anticipated that emergency medical responses to the project site would come from Pahrump, Nevada, located 28-miles (30-minutes) from the project site.

Schools

There are six school districts within Inyo County, including Big Pine Unified School District (USD), Bishop USD, Death Valley USD, Lone Pine USD, Owens Valley USD, and Round Valley Joint Elementary School District (JESD; County 2015). There are no schools located within the project vicinity. The nearest school to the project site is Hafen Elementary School, located approximately 6.9-miles northeast of the project site at 7120 Hafen Road in Pahrump, Nevada.

Parks

Parks operated by the County Parks and Recreation Department include seven parks located in Bishop, Big Pine, Independence, and Lone Pine (County 2015). There are no parks located within the project vicinity.

Other Public Facilities

There are two hospitals located in Inyo County. Northern Inyo Hospital is located in Bishop and Southern Inyo Hospital is located in Lone Pine (County 2015). There are no hospitals located within the project vicinity. The nearest hospital to the project site is the Desert View Hospital located approximately 15-miles northeast of the project site (40 minutes driving time) at 360 S Lola Lane, Pahrump, Nevada.

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.14, *Public Services*, of the REGPA PEIR, with implementation of Mitigation Measure PUB-1, Mitigation Measure PUB-2, and Mitigation Measure PUB-3, impacts related to public services would be less than significant.

Discussion of Projects Impacts

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

    i. Fire Protection

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that SEDAs are generally located in more remote areas of the County, where provision of fire protection would take some time to be provided. Fire protection services include the six FPD within the boundaries of the County, including the Big Pine FPD, Bishop FPD, Independence FPD, Lone Pine FPD, Olancha Volunteer Fire Department, and Southern Inyo FPD, as well as State and federal

land management agencies on lands they manage as well as CAL FIRE. The commitment of fire protection resources to future solar development projects has a potentially significant impact. Mitigation Measure PUB-1, which requires response times and staff levels to be analyzed, and Mitigation Measure PUB-3, which requires payment of mitigation fees for public safety and protection services, would be implemented to reduce impacts to fire protection resources. With implementation of Mitigation Measure PUB-1 and Mitigation Measure PUB-3, the impact would be less than significant.

Impacts from the Proposed Project

Fire prevention and suppression procedures would be provided in the Emergency Response Plan and would address potential fire sources and appropriate safety and fire prevention measures. Project-specific fire prevention and suppression procedures would include vehicle exhaust systems, fueling operations, smoking, electrical work, and on-site flammable liquid storage. Fire suppression, emergency preparedness, and emergency notification and follow-up procedures would be addressed, and other measures such as carrying fire extinguishers and shovels would be incorporated into the procedures. It is anticipated that fire response to the project site would come from the Southern Inyo FPD in Tecopa (25-miles/45-minutes) or from Pahrump, Nevada.

The preparation of the Emergency Response Plan would satisfy the requirements of REGPA PEIR Mitigation Measure PUB-1. Additionally, pursuant to ICC Title 21, mitigation fees would be paid by the project applicant for fire protection services to maintain proper staffing levels and response time, as required under Mitigation Measure PUB-3.

With implementation of REGPA PEIR Mitigation Measures PUB-2 and PUB-3, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

ii. Police Protection

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that future solar development projects in the SEDAs would require police protection in the event of a vehicle accident, worker conflict, and potential vandalism and/or theft during construction and long-term operation of the projects. While existing law enforcement is in place in the County, the ICSD and CHP provide services to a large area. Some of the SEDAs are located in isolated areas, including Charleston View SEDA. The need for law enforcement services for future solar development project sites in the SEDAs has a potentially significant impact. Mitigation Measure PUB-1, which requires response times and staff levels to be analyzed, Mitigation Measure PUB-2, which requires on-site security during construction and long-term operation, and Mitigation Measure PUB-3, which requires payment of mitigation fees for public safety and protection services, would be implemented to reduce impacts to law enforcement services. With implementation of Mitigation Measure PUB-1, Mitigation Measure PUB-2, and Mitigation Measure PUB-3, the impact would be less than significant.

Impacts from the Proposed Project

An Emergency Response Plan would provide information and instructions to guide site managers, workers, and first responders in preparing for, and safely responding to, an incident, fire, or other emergency associated with the solar facility and appurtenant systems. The Emergency Response Plan includes the general hazards and nearby exposures related to construction and operations, as well as detailed information including but limited to the Incident Command System, safety, staging areas, site access, lock box access, and water supply. The EPC contractor must have a qualified health and safety individual at the construction trailer from construction start to completion. This individual must be EMT trained. The construction trailer must contain a first aid kit and a defibrillator.

Emergency response procedures would include emergency recognition and prevention, organization and personnel responsibilities, emergency alerting procedures, maps and diagrams of the facilities, incident documentation, investigation responsibilities, and post-emergency activities. Specific emergency response procedures for medical, severe weather, power outages, and other situations would also be addressed in a Health and Safety Plan. The preparation of the Emergency Response Plan and Health and Safety Plan would satisfy the requirements of REGPA PEIR Mitigation Measure PUB-1. It is anticipated that emergency medical responses to the project site would come from Pahrump, Nevada, located 28-miles (30-minutes) from the project site.

As outlined in Section 4.5, Health and Safety, prior to the start of construction, the project applicant would conduct a safety assessment to identify potential safety issues and to develop measures that would be employed to mitigate them. Potential safety issues include site safety and security, worker on-site and off-site (travel) injuries, fire control, safe work practices, heavy equipment transportation, and traffic management. A health and safety program would be developed to protect both workers and the public during project construction, including a Health and Safety Plan with emergency response procedures.

The project would post warning signs along the project access roads from Nevada Route 160 to the site boundary informing the public of construction activities, warning of increased vehicles and potential wide loads on the roads and directing that the public does not enter the site. For areas where public safety risks could exist and site personnel would not be available to control public access (such as excavated foundation holes and electrical distribution system trenches), warning signs and temporary fences or flagging would be erected. Fencing also would be installed around material storage, staging, and laydown areas. Other areas determined to be hazardous or where issues of security or theft are of concern also may be fenced. Temporary fencing around unfinished excavations and other potential hazards typically would consist of a high-visibility plastic mesh or red/yellow danger tape. The project applicant could also use security guards, cameras, and/or additional fencing, if necessary, to protect public health and safety and project facilities.

The site-specific Health and Safety Plan is provided to all workers and is available electronically and in hard copy on-site. It is generally reviewed and updated at least annually, and all changes are communicated to workers. The purpose of the plan is to provide compliance with federal, State, and local Health and Safety requirements, project and site-specific concerns, and the EPC corporate Health and Safety guidance. Site safety procedures would address a zero-injury safety policy, responsibilities and roles of personnel, health and safety for subcontractors, worker safety orientation and training, severe weather conditions, and accident/incident reporting procedures. The site safety procedures would also outline employee safe work programs, including drug and alcohol policies, hazardous

materials, fire protection, respirator use and maintenance, confined workspaces, and potential work hazards such as blood-borne pathogens, electrical hazards, and environmental dangers.

The preparation of the Health and Safety Plan would satisfy the requirements of REGPA PEIR Mitigation Measure PUB-1.

Additionally, pursuant to ICC Title 21, mitigation fees would be paid by the project applicant for law enforcement services to maintain proper staffing levels and response time, as required under REGPA PEIR Mitigation Measure PUB-3.

With implementation of REGPA PEIR Mitigation Measures PUB-2 and PUB-3, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

iii. Schools

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that demand for new and/or expanded school facilities is directly associated with increases in local population. Future solar development projects are not expected to result in the construction of new housing, and thus, would not result in a direct increase in population or school-aged children in the County. Temporary jobs are expected to be associated with the construction of future solar development projects; however, these jobs are largely expected to be filled by construction workers already living in the County, or by visiting workers that travel to the area for temporary construction employment. It is not expected that construction workers traveling from outside of the County to work on future solar development projects would relocate families with school-aged children during the term of their temporary work. Long-term job generation associated with future solar energy development projects is expected to be low. Minor long-term employment needs are expected to be associated with the operation of future solar development projects and would include jobs associated with management, monitoring, and maintenance of the facilities. This relatively small, permanent workforce is likely to be composed, at least partially, by workers already residing in the County. Small numbers of long-term workers may relocate to the County on a permanent basis and bring families with school-aged children. Future solar development projects would be subject to the payment of school mitigation fees required by Senate Bill 50. As such, impacts to schools would be considered less than significant.

Impacts from the Proposed Project

There are no schools located within the proposed project vicinity. The nearest school to the project site is Hafen Elementary School, located approximately 6.9-miles northeast of the project site at 7120 Hafen Road in Pahrump, Nevada.

Construction Impacts

As outlined in Section 5.XIII, Population and Housing, employment during construction may range up to 450 workers depending on the construction activity. Workers would commute by private vehicle to the

site each workday, most likely from cities and towns in Nevada such as Pahrump, located approximately 25-miles from the project area, and Las Vegas, located approximately 60-miles from the project area, due to availability of housing; camping or staying in recreational vehicles will not be allowed on site or in the local area per Inyo County Code 14.04.040 (Habitation Restrictions). Therefore, as construction workers would commute to the site each workday, construction of the proposed project would not result in an increase in school age children or result in impacts to the capacity of local schools.

Operational Impacts

As outlined in Section 5.XIII, Population and Housing, operation of the solar energy facility would require approximately 6-10 full-time employees. The operations workforce would include off-site facility managers, administrative support, SCADA instrument and PV module technicians, and other monitoring and maintenance personnel. The majority of the employees would be full-time throughout the anticipated life of the project. During the first several years of project operations (the warranty period), additional personnel employed by the component manufacturer(s) may be on-site conducting equipment performance monitoring and calibration. Seasonal workers would be on-site to support vegetation management as needed.

It is anticipated that the small, permanent workforce associated with the long-term operation of future solar development projects is likely to be composed, at least partially, by workers already residing in the County. Long-term workers may relocate to the County on a permanent basis, but increases to local population associated with new workers relocating to the County would be small and insignificant compared to the existing population and available housing in the County. No long-term housing would be constructed as part of the project. Additionally, the proposed project would be subject to the payment of school mitigation fees required by Senate Bill 50. Therefore, operation of the proposed project would not result in impacts to the capacity of local schools.

Impact Conclusion

Impacts to schools would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

iv. Parks

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that future solar development projects are not expected to result in substantial direct or indirect population increases. Temporary jobs would be generated during construction of individual future solar development projects; however, these jobs are not expected to result in permanent population increases in the County. Small amounts of long-term jobs could be generated as a result of future solar development projects; however, any population increase associated with long-term jobs for future solar development projects is expected to be minor. These jobs may be filled by people already residing in the County or small numbers of long-term workers may relocate to the County on a permanent basis to fill these positions. Regardless, the small amount of jobs generated from long-term operation of future solar development projects is expected to result in a minimal

increase in population, and thus, a minimal increase in the usage of local parks. Impacts would be less than significant, pursuant to ICC Title 21 and the REGPA policies.

Impacts from the Proposed Project

There are no parks located within the proposed project vicinity.

Construction Impacts

As outlined in Section 5.XIII, Population and Housing, employment during construction may range up to 450 workers depending on the construction activity. Workers would commute by private vehicle to the site each workday, most likely from cities and towns in Nevada such as Pahrump, located approximately 25-miles from the project area, and Las Vegas, located approximately 60-miles from the project area, due to availability of housing; camping or staying in recreational vehicles will not be allowed on site or in the local area per Inyo County Code 14.04.040 (Habitation Restrictions). Therefore, as construction workers would commute to the site each workday, construction of the proposed project would not result in an increase in the usage of parks within the County.

Operational Impacts

As outlined in Section 5.XIII, Population and Housing, operation of the solar energy facility would require approximately 6-10 full-time employees. The operations workforce would include off-site facility managers, administrative support, SCADA instrument and PV module technicians, and other monitoring and maintenance personnel. The majority of the employees would be full-time throughout the anticipated life of the project. During the first several years of project operations (the warranty period), additional personnel employed by the component manufacturer(s) may be on-site conducting equipment performance monitoring and calibration. Seasonal workers would be on-site to support vegetation management as needed.

It is anticipated that the small, permanent workforce associated with the long-term operation of future solar development projects is likely to be composed, at least partially, by workers already residing in the County. Long-term workers may relocate to the County on a permanent basis, but increases to local population associated with new workers relocating to the County would be small and insignificant compared to the existing population and available housing in the County. No long-term housing would be constructed as part of the project. Therefore, operation of the proposed project would not result in an increase in the usage of parks within the County.

Impact Conclusion

Impacts to parks would be less than significant, pursuant to ICC Title 21 and the REGPA policies, and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

v. Other Public Facilities

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the project would not result in a noticeable increase in demand for emergency services at the hospitals located within the County. Future solar development projects within the SEDAs would have temporary construction work forces at these remote sites, and thus, the potential need for emergency hospital services associated with construction work would be temporary and insignificant. Long-term activity at future solar development project sites would involve limited personnel presence at each site associated with maintenance, monitoring, and management of facilities. Medical emergencies requiring hospital services are expected to be minimal during the long-term operation of future solar development projects. The need for hospital services is expected to be minimal, and the availability of hospitals both within and outside of the County would result in minimal impacts to hospital services associated with future solar projects. Impacts would be less than significant, pursuant to ICC Title 21 and the REGPA policies.

Impacts from the Proposed Project

Emergency response procedures would include emergency recognition and prevention, organization and personnel responsibilities, emergency alerting procedures, maps and diagrams of the facilities, incident documentation, investigation responsibilities, and post-emergency activities. Specific emergency response procedures for medical, severe weather, power outages, and other situations would also be addressed in a Health and Safety Plan. It is anticipated that emergency medical responses to the project site would come from Pahrump, Nevada, located 25-miles (30-minutes) from the project site.

Therefore, impacts to other public facilities would be less than significant, pursuant to ICC Title 21 and the REGPA policies, and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

The following Mitigation Measure from the REGPA PEIR are applicable to the proposed project, as indicated in the discussion above.

REGPA PEIR MM PUB-2: Provide on-site security during the construction and long-term operation of the utility scale project.

For project sites associated with proposed future solar development projects that are determined through mitigation measure PUB-1 to have insufficient law enforcement protection services or significant impacts to law enforcement services, project proponents shall be required to provide adequate, on-site private security for the duration of construction activities and during the long-term operation of the project to the satisfaction of the County. The actual size and configuration of the security details shall be determined by the County during preparation of the Development Agreement for the future solar energy project.

REGPA PEIR MM PUB-3: Pay mitigation fees for public safety and protection services.

The County shall require project proponents to pay development mitigation fees for fire and police protection services, pursuant to ICC Title 21. Said fees shall be used to maintain proper staffing levels for

fire, police protection, and emergency services and to sustain adequate response times as required by the County

XV. RECREATION

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No new Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	☐	☐	☐	☒

Environmental Setting

Inyo County contains vast areas of undeveloped open space areas rich in natural resources and features that provide a variety of outdoor recreational opportunities. Most of the land within the County is publicly owned, and public agencies provide and manage various outdoor recreational facilities and resources that are heavily frequented by visitors and residents alike. The Inyo County Parks and Recreation Department manages and maintains seven parks within the County that total approximately 139-acres of parkland (County 2015).

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.15, *Recreation*, of the REGPA PEIR, impacts related to recreation would be less than significant.

Discussion of Project Impacts

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR determined that since the SEDAs were sited in an area that do not contain recreational resources, solar energy development under the REGPA would not create indirect or direct impacts to existing recreational uses and there would be a less than significant impact.

Impacts from the Proposed Project

The proposed project is located within the Charleston View SEDA, which does not contain recreational resources.

Construction Impacts

The proposed project would include construction, operation, and maintenance of a 2,400-acre utility scale solar PV energy generating facility. The project would not include any road improvements beyond adding a gravel road base to the County roads, as needed. As outlined in Section 4.4, Construction, employment during construction may range up to 450 workers depending on the construction activity. Workers would commute by private vehicle to the site each workday, most likely from cities and towns in Nevada such as Pahrump, located approximately 25-miles from the project area, and Las Vegas, located approximately 60-miles from the project area, due to availability of housing; camping or staying in recreational vehicles will not be allowed on site or in the local area per Inyo County Code 14.04.040 (Habitation Restrictions). Therefore, as construction workers would commute to the site each workday, construction of the proposed project would not result in an increase in the usage of parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Operational Impacts

As outlined in Section 4.6, Operation and Maintenance, operation of the solar energy facility would require approximately 6-10 full-time employees. The operations workforce would include off-site facility managers, administrative support, SCADA instrument and PV module technicians, and other monitoring and maintenance personnel. The majority of the employees would be full-time throughout the anticipated life of the project. During the first several years of project operations (the warranty period), additional personnel employed by the component manufacturer(s) may be on-site conducting equipment performance monitoring and calibration. Seasonal workers would be on-site to support vegetation management as needed.

It is anticipated that the small, permanent workforce associated with the long-term operation of future solar development projects is likely to be composed, at least partially, by workers already residing in the County. Long-term workers may relocate to the County on a permanent basis, but increases to local population associated with new workers relocating to the County would be small and insignificant compared to the existing population and available housing in the County. No long-term housing would be constructed as part of the project. Therefore, operation of the proposed project would not result in an increase in the usage of parks or recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact Conclusion

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was previously analyzed in the REGPA PEIR.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that since the REGPA does not propose development of recreational facilities, and since the small number of jobs generated from long-term operation of future solar development projects is expected to result in a minimal increase in the County's population and usage of local parks, impacts related to new recreational facilities would be less than significant.

Impacts from the Proposed Project

Implementation of the proposed project would not include development of recreational facilities and, as described in question a) above, would not cause population growth that would generate the need to construct or expand recreational facilities. The proposed project also does not include a recreational component, such as a hotel, resort, campground, or other facility that would attract or accommodate an increase in visitors to the area that would indirectly increase the use or demand for recreational and park facilities and services.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was previously analyzed in the REGPA PEIR.

Applicable Mitigation Measures

No Mitigation Measures from the REGPA PEIR are applicable to the proposed project related to recreation.

XVI. SOCIOECONOMICS

CEQA Guidelines Section 15131 states, "…[e]conomic or social information may be included in an EIR or may be presented in whatever form the agency desires." It is important to note that: "…(a) economic or social effects of a project shall not be treated as significant effects on the environment…" The County's proposed project objectives include minimizing any negative direct and indirect economic impacts on the County's residents due to solar energy development. Although socioeconomic issues are not typically addressed in a topic specific EIR section, socioeconomics is an issue of concern to the County; therefore, the information in this section is presented to better inform the REGPA process.

Environmental Setting

Inyo County is rural, with approximately 10,200-square miles of land and 18,627 people, resulting in a population density of 1.8 persons per square-mile. Based on the projected growth for the County, an increase of 3,436 persons through 2040 would result in an 18.5 percent increase in total population (County 2015).

Employment and Housing

Because the County is considered rural, it is likely the local construction workforce is willing to regularly commute longer distances (up to a two-hour commute) when compared to larger urban centers. It should be noted that the bulk of the County's population, core services, and infrastructure are in the Owens Valley. However, socioeconomic effects extend throughout the County (County 2015).

The unincorporated areas of the County (County total minus City of Bishop) contain a higher number of vacant housing units when compared to the City of Bishop. The construction of infrastructure projects often requires specialized workers from outside of the local, and even regional workforce area. Depending upon the duration of their work assignment, these workers either look for short-term housing (apartments) or transient housing (hotels, motels, and recreational vehicle parks). Because the County provides substantial outdoor recreational opportunities, a number of transient housing opportunities are also available within the County. The total number of available hotel/motel rooms and recreational vehicle (i.e., mobile homes) spaces available within the County fluctuates based on demand. Because the County recreational opportunities occur in both mountainous and desert areas, it is assumed recreational demand for transient housing occurs year-round (County 2015).

Local Economy

The County's economy has historically relied on natural resources as its base. This includes cattle ranching to supply miners with food during the gold rush, extracting a wide variety of minerals found in the County, sheepherding, growing orchard and vegetable crops, and tourist based activities that take advantage of the unique landscapes and wildlife the County has to offer. In recent times, the County has relied more on tourist based activities and services, as well as government and land management as its main economic drivers. Renewable energy development has also played a role in the County's economy, with the Coso Geothermal Power Plant and several hydroelectric generating facilities located within the County (County 2015).

Impacts and Management Measures from the REGPA PEIR

As outlined in Section 4.16, *Socioeconomics*, of the REGPA PEIR, with implementation of REGPA policies, ICC Title 21, and the recommended Management Measures SOC-1 and SOC-2, it is envisioned that the County would be able to maintain its current economic condition and not realize an adverse fiscal impact from construction and operation of solar energy facilities.

Discussion of Project Impacts

The discussion below analyzes the typical socioeconomic effects associated with the siting of solar energy facilities and associated transmission infrastructure. Pursuant to ICC Title 21, the County routinely reviews all solar energy development proposals for effects on socioeconomics. Therefore, all future solar energy projects would be evaluated on a project-specific basis to assess specific effects on socioeconomics against the program level analysis contained in the REGPA PEIR.

a) Population In-Migration

Impacts from the REGPA PEIR

The REGPA PEIR determined that construction of future utility scale solar energy and transmission projects would bring workers into the County, which could exceed the amount of available housing, public service levels, and results in overall social disruption. The potential for negative effects related to a diminished short term housing supply during construction is increased within the County due to the rural nature of the County and its small clusters of communities.

Operations and maintenance of individual renewable energy facilities and transmission lines typically require relatively few workers. Cumulative renewable energy project development is expected to generate some level of permanent population to the County. However, in the long term, operational worker migration to the County as a result of utility scale renewable energy project development would likely be a small portion of the overall projected population growth for the County.

Impacts from the Proposed Project

Construction Impacts

As outlined in Section 4.4, Construction, construction of the solar facility would commence as early as January 2027. The proposed project will occur over two regions within an approximately 18-month construction period.

Employment during construction may range up to 450 workers depending on the construction activity. Workers would commute by private vehicle to the site each workday, most likely from cities and towns in Nevada such as Pahrump, located approximately 25-miles from the project area, and Las Vegas, located approximately 60-miles from the project area, due to availability of housing; camping or staying in recreational vehicles will not be allowed on site or in the local area per Inyo County Code 14.04.040 (Habitation Restrictions). The project applicant would use qualified local and non-local contractors/subcontractors according to the equipment and personnel needs of the project. Workers would utilize the construction trailers during the workday for office use and site safety briefings; these trailers would be locked at the end of each workday. Workers would bring their own workday food, or a

food truck may be provided. Sanitation facilities for the workers would consist of exterior porta-johns and/or sanitation trailers.

As construction would be short-term and temporary and as all construction workers would commute to the project site each workday, Management Measure SOC-1, which minimizes impacts on transient housing, would not be applicable.

Operational Impacts

As outlined in Section 4.6, Operation and Maintenance, operation of the solar energy facility would require approximately 6-10 full-time employees. The operations workforce would include off-site facility managers, administrative support, SCADA instrument and PV module technicians, and other monitoring and maintenance personnel. The majority of the employees would be full-time throughout the anticipated life of the project. During the first several years of project operations (the warranty period), additional personnel employed by the component manufacturer(s) may be on-site conducting equipment performance monitoring and calibration. Seasonal workers would be on-site to support vegetation management as needed.

It is anticipated that the small, permanent workforce associated with the long-term operation of future solar development projects is likely to be composed, at least partially, by workers already residing in the County. Long-term workers may relocate to the County on a permanent basis, but increases to local population associated with new workers relocating to the County would be small and insignificant compared to the existing population and available housing in the County. No long-term housing would be constructed as part of the project.

b) Economic Effects

Impacts from the REGPA PEIR

The REGPA PEIR determined that renewable energy development has the potential to add to the County's economic base. Positive economic and tax base effects would occur during construction from expenditures on worker wages and salaries, as well as from procurement of goods and services required for project construction. Additionally, these workers would temporarily increase the demand for transient housing.

All new solar energy facilities would require interconnection into the electric grid (i.e., transmission or distribution). Transmission lines and substations are subject to appraisal and property tax payments to the State, which helps increase funds distributed to the County. Therefore, from an economic perspective, electric infrastructure development would have beneficial effects for the County.

Impacts from the Proposed Project

As outlined in question a), as construction would be short-term and temporary and as all construction workers would commute to the project site each workday, Management Measure SOC-1, which minimizes impacts on transient housing, would not be applicable. Additionally, it is anticipated that the small, permanent workforce associated with the long-term operation of future solar development projects is likely to be composed, at least partially, by workers already residing in the County. No long-term housing would be constructed as part of the project.

With regard to economic benefits, a goal of the project is to provide solar-generated electricity from a site in Inyo County to meet the region's existing and future electricity needs while providing a reliable, economical, and non-polluting, domestic, renewable energy resource in the region. Therefore, consistent with the REGPA PEIR, the proposed solar development project would have beneficial economic effects for the County.

c) Social Disruption Effects

Impacts from the REGPA PEIR

The REGPA PEIR determined that the temporary migration of construction workers to the County would likely result in an increased demand for transient housing. As the County is not heavily populated, the potential for this impact is elevated in comparison to more urbanized areas. Management Measure SOC-1, which minimizes impacts on transient housing, would further reduce the potential negative effects to the local transit housing market.

The REGPA also determined that the critical concern from renewable energy development is overburdening public services from the temporary migration of construction workers to the County. Management Measure SOC-2, which minimizes impacts on County public services, further reduces potential negative effects on County public service levels and demands placed on providers.

Impacts from the Proposed Project

As outlined in question a), as construction would be short-term and temporary and as all construction workers would commute to the project site each workday, Management Measure SOC-1, which minimizes impacts on transient housing, would not be applicable.

To address concerns regarding overburdening public services, and in compliance with Management Measure SOC-1, the project applicant and the local Charleston View community are negotiating a community benefits package that would include multiple infrastructure improvements and/or economic/financial contributions to the community, including the Southern Inyo FPD. These contributions could include equipment upgrades, a new station for the Southern Inyo FPD, or dedication of land, to name a few. Preparation and implementation of this community benefits package would minimize the effects on County public services, and Management Measure SOC-2 would be satisfied.

Applicable Management Measures

No Management Measures from the REGPA PEIR are applicable to the proposed project related to socioeconomics.

XVII. TRANSPORTATION AND CIRCULATION

		New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:					
a)	Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
b)	Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c)	Result in a change of air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e)	Result in inadequate emergency access?	☐	☐	☐	☒
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

A Transportation Analysis was prepared by Kittelson & Associates, Inc. on March 16, 2026, and is incorporated below and included as Appendix P to this IS/Addendum.

Environmental Setting

Travel in the County is primarily automobile oriented due to the rural nature of the local communities, low development densities, and limited options for using alternative modes of travel. The roadway system serving the County is comprised of approximately 3,520-miles of roadway and highways (County 2015). The project site is adjacent to the California – Nevada state line and Tecopa Road/Old Spanish Trail Highway , is located approximately 0.25-mile south of the project site.

There are no transit services nor paved sidewalks in the area. Along Nevada Route 160, there are Class II bicycle facilities (bike lanes) in both directions and are approximately 8-feet-wide. However, no

dedicated bicycle facilities are around the immediate vicinity of the project site. The primary mode of travel around the area is vehicular travel.

Methodology and Assumptions

Trip generation Assessment

Project-related trip estimates were calculated to assess the project's traffic effects on roads during construction. The construction trip generation is shown in Table 11, *Project Construction Trip Generation*, below, and has been calculated for total trips and passenger car equivalent (PCE) trips. A PCE factor is applied to truck trips to account for the fact that trucks utilize more capacity on the roadway than a passenger car due to their larger size and slower acceleration. A PCE factor of 2.0 for heavy-duty trucks was used for this analysis, based on the guidance for PCE factors found in the Highway Capacity Manual, 7th Edition.

Table 11: Project Construction Trip Generation

Trip Type	Number of Vehicles	Vehicle Trips			PCE Trips		
		Daily	AM Peak Hour	PM Peak Hour	Daily	AM Peak Hour	PM Peak Hour
Passenger Cars	450	900	450	450	900	450	450
Heavy Duty Trucks	40	80	40	40	160	80	80
	Total Number of Trips	**980**	**490**	**490**	**1,060**	**530**	**530**

Source: Transportation Analysis (Appendix P)

The proposed project's trip distribution was developed based on a review of the adjacent roadway network and surrounding land uses to determine anticipated origins and paths of travel. It is assumed that all vehicles would commute to the jobsite from communities located northeast of the project, likely from Pahrump and/or Las Vegas.

Level of Service Assessment

Level of service (LOS) describes the operating conditions experienced by motorists. LOS is a qualitative measure of the effect of several factors, including speed and travel time, traffic interruptions and delay, freedom to maneuver, driving comfort, and convenience. LOS A through LOS F covers the entire range of traffic operations that might occur. Motorists using a facility that operates at LOS A experience very little delay, while those using a facility that operates at LOS F will experience long delays. Intersection analyses for the study intersection were conducted using the operational methodologies outlined in the 7th Edition of the Highway Capacity Manual (HCM) methodology calculated with Vistro software.

Using the HCM procedure, the level of service designation for a signalized intersection is determined by calculating the weighted average control delay in seconds per vehicle. For unsignalized intersections, the HCM methodology is also used to calculate the weighted average control delay for each controlled intersection leg and for the intersection as a whole. In the case of two-way stop-controlled intersections, the LOS for the worst approach is used as the performance measure for the intersection's LOS.

Regulatory Standards

In the absence of Inyo County-specific LOS thresholds, Caltrans standards are used for reference. Caltrans has designated LOS C as the target LOS.

Data Collection

Vehicle turning movement counts were collected at the intersection of Tecopa Road and Nevada Route 160 during the AM (5 to 10 AM) and PM (3 to 8 PM) peak periods on Wednesday, February 26, 2025. 24-hour roadway counts at the following segments were also collected for verification of data collection and to inform the evaluation of potential adverse traffic effects with the project:

- Old Spanish Trail Highway (Tecopa Road in Nevada) between Silver Street and Tuscarora Street
- Tuscarora Street between Avenue D and Old Spanish Trail Highway
- Tecopa Road between Tuscarora Street and Nevada Route 160

The 24-hour roadway counts confirmed that within the project area's vicinity, approximately 200 vehicles are seen traveling along Tecopa Road and Old Spanish Trail Highway daily, with up to 30 vehicles during the AM and PM peak hours. Less than three vehicles are seen traveling along Tuscarora Street daily, with no vehicles observed during the AM and PM peak hours. This suggests that the area experiences light traffic volumes overall, with only modest increases during peak periods.

VMT Assessment

At the time of writing this report, Inyo County has not adopted VMT thresholds. Therefore, VMT guidance from the Governor's Office of Land Use and Climate Innovation (LCI) , formerly Office of Planning and Researcher's (OPR's), Technical Advisory on Evaluating Transportation Impacts in CEQA was used. LCI's interpretation of CEQA Guidelines Section 15064.3 suggests that VMT analysis in the Transportation section of a CEQA document should be focused on automobiles and light duty truck trips. Therefore, vehicle trips mentioned in this section do not include trips that are from heavy duty trucks such as water-transporting and construction trucks.

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.17, *Transportation and Circulation*, of the REGPA PEIR, with implementation of Mitigation Measure TRA-1, Mitigation Measure TRA-2, Mitigation Measure HAZ-2, Mitigation Measure AES-2, Mitigation Measure AES-3, and Mitigation Measures AES-6, impacts related to transportation and circulation would be less than significant.

Discussion of Project Impacts

a) Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the

circulation system, including but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that significant construction traffic impacts could result from workers commuting to the solar energy project site for larger projects. However, Mitigation Measure TRA-2, which requires the preparation of a traffic analysis, would be implemented to reduce construction-related vehicle transportation impacts. Given the small number of traffic trips generated by solar energy projects, the associated negligible increase in trips on local roadways and highways would not adversely impact the local transportation system or otherwise degrade LOS operations. Operational traffic impacts would be less than significant. The REGPA PEIR also concluded that solar developments would not compromise the safety of transit service or bicycle/pedestrian facilities. With implementation of Mitigation Measure TRA-2, the impact would be less than significant.

Impacts from the Proposed Project

Construction Impacts

A Transportation Analysis was prepared for the proposed project (Appendix P). As outlined in the Transportation Analysis, it is anticipated that vehicle traffic during the construction period would be primarily comprised of worker's passenger cars/light trucks, worker shuttles, delivery trucks, dump trucks, water trucks, waste hauling trucks, crane equipment vehicles, and portable toilet trucks. The highest number of trips would generally be generated by construction workers traveling to and from the site each day. The total calculated number of vehicle trips per day during construction would be 980 trips, as shown in Table 11. Compared to existing conditions, the average delays at the Tecopa Road and the Nevada Route 160 intersection doubles for both AM and PM peak hours. Correspondingly, the intersection's LOS shifts from LOS A to LOS B during the AM peak hour and shifts from LOS A to LOS C in the PM peak hour. Additionally, delays at Old Spanish Trail Highway and Zircon Street intersection would increase by approximately 7-seconds per vehicle while remaining to operate as LOS A. Despite the longer delays, both intersections would still operate at an acceptable level of service (LOS C or better) during construction. Therefore, the project would not result in a short-term impact due to construction traffic. As a Transportation Analysis was prepared, REGPA PEIR Mitigation Measure TRA-2, which requires preparation of a traffic analysis, has been satisfied for the proposed project.

Operational Impacts

As also outlined in the Transportation Analysis, after construction is completed and the project becomes operational, traffic volumes generated by the proposed project are expected to be negligible. As outlined in Section 4.6, Operation and Maintenance, operation of the solar energy facility would require approximately 6-10 full-time employees. LCI's Technical Advisory on Evaluating Transportation Impacts in CEQA focuses on long term VMT impacts from placement of land uses and transportation facilities and does not specify thresholds to evaluate impacts during project construction. Vehicle trips used for

construction purposes would be temporary, and any generated VMT would generally be minor and limited to construction equipment and personnel and would not result in long-term trip generation. Therefore, the VMT screening criteria apply for long-term operations. Given that the project would require a workforce of up to 10 workers on-site during commercial operations at various intervals throughout the year, the project is anticipated to generate fewer than 110 daily one-way trips. Therefore, the project screens out as a small project and would not result in a significant impact due to low long-term operational traffic.

As outlined in question f), there are no existing pedestrian facilities along any of the roadways surrounding the project site. Additionally, there are minimal biking and walking activity levels along the project site's access frontage. Therefore, adverse effects on bicycling and walking are not anticipated along the project site during construction or operation.

Impact Conclusion

The impact for questions a) and b) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

c) Would the project result in a change of air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that notification to the FAA is required for proposed structures over 200-feet in height regardless of the distance from an airport. These regulations establish standards for determining obstructions in navigational airspace. Mitigation Measure HAZ-2, which requires the preparation of a site-specific Airport Safety Investigation, would be implemented to reduce impacts related to airport safety. The REGPA also concluded that solar energy components can produce glare effects from solar collectors and other potentially reflective surfaces. As a result, associated air traffic impacts would be potentially significant. However, Mitigation Measure AES-2, which requires preparation of glare studies, Mitigation Measure AES-3, which requires the use of colors to blend with the surrounding landscape, and Mitigation Measures AES-6, which requires solar panel glass to be treated with an anti-reflective coating, would be implemented to reduce potential operational glare impacts. With implementation of Mitigation Measure HAZ-2, Mitigation Measure AES-2, Mitigation Measure AES-3, and Mitigation Measure AES-6, the impact would be less than significant.

Impacts from the Proposed Project

Sky Ranch Airport is located approximately 18-miles south of the project site in Sandy Valley. Hidden Hills Airport is located 1.3-miles northeast of the project site. However, this airport was abandoned about 15-years and was removed from the JEPP charts. Therefore, Hidden Hills Airport is not an officially recognized airport, according to the FAA (Appendix D). Additionally, electrical connection lines and structural design for the proposed project would adhere to FAA, International Civil Aviation Organization, and APLIC guidelines to avoid avian electrocutions and minimize collision potential. As the proposed project is not located within the vicinity of an active airport or private airstrip, REGPA PEIR

Mitigation Measure HAZ-2, which requires the preparation of a site-specific Airport Safety Investigation, would not be applicable to the proposed project.

Operational glare from reflective surfaces could result in substantial glare impacts. A Glare Analysis Memo was prepared by ERM and is included as Appendix E to this IS/Addendum. As outlined in the Glare Analysis Memo, the PV panels would contain smooth glass with an anti-reflective coating. Therefore, REGPA PEIR Mitigation Measures AES-6, which requires solar panel glass to be treated with an anti-reflective coating, has been satisfied for the proposed project. The Glare Analysis Memo determined that the project would not generate glare and would not require modifications or visual buffers to minimize or limit glare. Therefore, REGPA PEIR Mitigation Measure AES-3, which requires the use of colors to blend with the surrounding landscape, would not be required. Additionally, as a Glare Analysis Memo was prepared, REGPA PEIR Mitigation Measure AES-2, which requires preparation of glare studies, has been satisfied for the proposed project.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

d) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that solar energy projects within any of the SEDAs or OVSA would require construction of access roads that would intersect with existing local roadways. These access roads would be designed in compliance with County private roadway standards to allow safe passage of construction vehicles, including oversized trucks, and would provide safe adequate sight distances from project driveways and intersections. Additionally, solar energy projects would not likely include curves, slopes, walls, landscaping, or other barriers that would create potential conflicts between vehicles accessing the solar energy project site. Glare can be generated from solar components at varying intensities could interfere with motorists' vision on roadways. However, Mitigation Measure AES-2, Mitigation Measure AES-3, and Mitigation Measure AES-6, would be implemented to reduce potential operational glare impacts. With implementation of Mitigation Measure AES-2, Mitigation Measure AES-3, and Mitigation Measure AES-6, the impact would be less than significant.

Impacts from the Proposed Project

New service roads would be constructed within the project site along electrical collector line corridors to support project construction and operation. The number and length of roads would be minimized to the extent possible to reduce surface disturbance. Such maintenance roads would have a permanent travel width of 16-feet and 2-foot shoulders with a gravel road base to a depth as required by the Fire Code Standards and Geotechnical Report (Appendix J) recommendations. The service roads would have an approximately 25-foot radius at road centerline and would have an approximately 35-foot radius at minimum or as dictated by the Fire Code Standards at road corners. The design speed for these roads would be approximately 15 mph. Water would be applied by tanker truck to all project roads up to six times per workday to control fugitive dust. These service roads would be used during construction to

facilitate delivery of components, installation, and wiring, and for scheduled and unscheduled (repairs) maintenance access during operations.

Operational glare from reflective surfaces could result in substantial glare impacts. A Glare Analysis Memo was prepared by ERM and is included as Appendix E to this IS/Addendum. As outlined in the Glare Analysis Memo, the PV panels would contain smooth glass with an anti-reflective coating. Therefore, REGPA PEIR Mitigation Measures AES-6, which requires solar panel glass to be treated with an anti-reflective coating, has been satisfied for the proposed project. The Glare Analysis Memo determined that the project would not generate glare and would not require modifications or visual buffers to minimize or limit glare. Therefore, REGPA PEIR Mitigation Measure AES-3, which requires the use of colors to blend with the surrounding landscape, would not be required. Additionally, as a Glare Analysis Memo was prepared, REGPA PEIR Mitigation Measure AES-2, which requires preparation of glare studies, has been satisfied for the proposed project.

The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

e) Would the project result in inadequate emergency access?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that a traffic control plan would be prepared and would include measures to avoid disruptions or delays in access for emergency vehicles and to notify emergency service providers of any road or traffic conditions that may impede emergency access. Associated potential impacts related to emergency access would be less than significant.

Impacts from the Proposed Project

The project site is surrounded by open space in all directions. The project site is adjacent to the Nevada state line and Tecopa Road/Old Spanish Trail Highway , is located approximately 0.25-mile south of the project site. It is anticipated that the proposed project would not be located within roadway ROW, and that an encroachment permit would not be required. Primary evacuation routes in the County consist of the major streets and highways within the County, as well as the interstate freeway system and State routes. Alternate evacuation routes in the County also include major surface streets, with the best routes to be determined at the time of the incident based on-site and event-specific conditions. It is anticipated that major streets and highways within the County may be used during construction and operation of the proposed project. A Traffic Management Plan, as required under REGPA PEIR Mitigation Measure TRA-1, would be prepared to avoid disruptions or delays in access for emergency vehicles and to notify emergency service providers of any road or traffic conditions that may impede emergency access.

With implementation of REGPA PEIR Mitigation Measure TRA-1, the impact would be less than significant, and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that most of the SEDAs are located in rural areas and, in some cases, mostly undeveloped areas where transit, bicycle, and pedestrian facilities are not available and for the most part, are not planned. Even if transit service or bicycle/pedestrian facilities would be located in the vicinity of a solar energy project site, solar developments would not be located within roadway ROWs and are typically set back from roadways and fenced and, therefore, would not compromise the safety of transit service or bicycle/pedestrian facilities. The impact would be less than significant.

Impacts from the Proposed Project

As outlined in the Transportation Analysis, there are no existing pedestrian facilities along any of the roadways surrounding the project site. Additionally, there are minimal biking and walking activity levels along the project site's access frontage. Therefore, adverse effects on bicycling and walking are not anticipated along the project site during construction or operation.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Applicable Mitigation Measures

The following Mitigation Measure from the REGPA PEIR are applicable to the proposed project, as indicated in the discussion above.

REGPA PEIR MM TRA-1: Prepare site-specific traffic control plans for utility scale projects

Site-specific traffic control plans shall be prepared for all proposed solar energy projects within the individual SEDAs and the OVSA to ensure safe and efficient traffic flow in the area of the solar energy project and within the project site during construction activities. The traffic control plan shall, at minimum, contain project specific measures to be implemented during construction including measures that address: (1) noticing; (2) signage; (3) temporary road or lane closures; (4) oversized deliveries; (5) construction times; and, (6) emergency vehicle access.

XVIII. UTILITIES AND SERVICE SYSTEMS

	New Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No New Impact
Would the project:				
a) Exceed wastewater treatment requirements of the applicable RWQCB?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider which serves, or may serve, the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, State, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Environmental Setting

Water

The IDCEH regulates 105 active public and state small drinking water systems located throughout the County. These 105 systems include: 31 community systems with between 25 and 199 residential service connections or 25 or more yearlong residents; 11 non-transient, non-community systems such as schools, institutions, and places of employment; 47 transient, non-community systems such as restaurants, campgrounds, and resorts; and 16 state small systems that serve between 5 and 14 residential service connections but less than 25 yearlong residents. There are also at least nine other larger water systems throughout the County that are regulated by California. Due to the SEDAs locations in undeveloped portions of the County, most of the water services that exist in the SEDAs consist of individual wells and individual septic systems, including the Charleston View SEDA (County 2015).

Wastewater

The majority of lands within the SEDAs, including the Charleston View SEDA, are undeveloped and do not contain wastewater infrastructure. Thus, wastewater services within the Charleston View SEDA consists of individual septic systems.

Solid Waste

The Inyo County Waste Integrated Waste Management Department (ICIWMD) provides management of liquid and solid wastes in the County. The ICIWMD is responsible for the operation of five landfills, four transfer stations, and four bin transfer sites in the County, including the Lone Pine, Independence, Bishop Sunland, Shoshone, and Tecopa Landfills. The Shoshone and Tecopa Landfills are not open to the public and accept mixed municipal, construction/demolition, dead animals, and green materials waste. The other three landfills are open to the public and accept industrial, mixed municipal, agricultural, construction/demolition, ash, tires, asbestos, contaminated soil, biosolids, and dead animal waste. Solid waste generated in the Southern and Eastern Solar Energy Groups would also be transported to Pahrump, Nevada or Ridgecrest in Kern County.

Stormwater

As described in Section 5.IX, Hydrology and Water Quality, surface drainage in the Charleston View SEDA is variable in direction with topography, and occurs through a number of unnamed ephemeral washes, including several large washes in Pahrump Valley, and as overland flow. All of these flows are internal and terminate at one or more local playas, including Stewart Dry Lake.

Other Services

Electricity within the County is provided by two service providers: Los Angeles Department of Water and Power (LADWP) and Southern California Edison (SCE).

Impacts and Mitigation Measures from the REGPA PEIR

As outlined in Section 4.18, *Utilities and Service Systems*, of the REGPA PEIR, with implementation of Mitigation Measures UTIL-1 and UTIL-2, impacts to utilities and service systems would be less than significant.

Discussion of Project Impacts

a) Exceed wastewater treatment requirements of the applicable RWQCB?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that due to the remote locations of the SEDAs, future solar development projects are expected to be served by on-site wastewater treatment and would not connect to existing systems. The REGPA PEIR also determined that future solar development projects within the SEDAs would be required to comply with the requirements of the Lahontan RWQCB, as well as the County's

land use entitlement and CEQA process to ensure adequate wastewater service for the site, in compliance with the RWQCB's discharge requirements. The REGPA PEIR concluded that compliance with these requirements and standards would ensure impacts associated with wastewater treatment requirements and wastewater capacity remain less than significant.

Impacts from the Proposed Project

The project site is located within the jurisdiction of the Lahontan RWQCB. Due to the remote location of the project site, a permitted septic system and/or tile field (if permitted) would be installed for wastewater treatment and disposal. Additionally, porta-johns would be used for construction employees. The proposed project would comply with Lahontan RWQCB and County requirements regarding wastewater facilities.

The impact would be less than significant and there would be *no new or substantially more severe* impact compared to what was previously analyzed in the REGPA PEIR.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that since future solar development projects within the SEDAs would be required to comply with the applicable requirements of the RWQCB, County policies including Policy WR-3.5: Sustainable Renewable Energy Solar Development, and the County's land use entitlement and CEQA process. Compliance with these applicable requirements would ensure impacts associated with water usage and wastewater generation would be less than significant.

Impacts from the Proposed Project

Water

As outlined in Section 4.4, Construction, the 18-month construction period would require a total of 1,085 AF of water and the estimated total annual water use during operations is approximately 0.014 AFY over the life of the project. Drinking water would also be supplied via a 5-gallon cooler dispenser in the O&M building.

Water for construction and operation would be sourced from one or more existing private groundwater wells within the project applicant's lease. Water rights adequate to support the annual water requirements for construction and operation are within the land lease held by the project applicant. The identification of project water supply wells will be determined upon well testing; all project water supply wells will be reviewed and approved by the Inyo County Environmental Health Department.

Additionally, it is anticipated that two temporary water storage ponds would be needed during construction. Each construction water storage pond would hold approximately 100,000-gallons, would be lined with a plastic and/or rubber liner, and would have a slight pitch to the corner closest to the transfer pump. Ponds would be filled as necessary from an on-site well according to water demands. Their locations would be identified upon a more detailed project design. Any surface water discharge

would be in compliance with water quality and sediment management regulations. The proposed project would comply with Lahontan RWQCB and County requirements regarding waste facilities.

Wastewater

Due to the remote location of the project site, a permitted septic system and/or tile field (if permitted) would be installed for wastewater treatment and disposal. Additionally, porta-johns would be used for construction employees. The septic system and porta-johns would serve the on-site wastewater needs of the project during construction and operation. The proposed project would comply with Lahontan RWQCB and County requirements regarding wastewater facilities.

Impact Conclusion

Therefore, the impact would be less than significant and there would be *no new impact* compared to what was previously analyzed in the REGPA PEIR.

c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that the undeveloped portions of the SEDAs do not contain stormwater drainage facilities, and that future solar development projects in the SEDA's could create new impervious surfaces, resulting in changes to the natural drainage. The REGPA PEIR concluded that the completion of the land use entitlement and CEQA process for future solar projects would ensure that impacts associated with adequate stormwater protection for individual sites would remain less than significant.

Impacts from the Proposed Project

During preconstruction activities, stormwater features would be delineated on the project site. No permanent stormwater drainage facilities would be expanded or constructed as part of the project.

As outlined in Section 5.IX, Hydrology and Water Quality, minimal grading would occur primarily at the substation, the O&M building sites and the interior project roads along electrical collection line corridors. As the proposed construction is minimal relative to the total project area, it is not anticipated that the drainage pattern would not be substantially altered. Additionally, construction activities that require more than one acre of ground disturbance are regulated by the Lahontan RWQCB and are subject to the requirements of the NPDES General Construction Permit, including preparation and implementation of a SWPPP during construction. The SWPPP must include details of how the sediment and erosion control BMPs would be implemented. As the proposed project would disturb greater than once acre, the proposed project would be subject to NPDES requirements and would be required to prepare and implement a SWPPP including BMPs to reduce soil erosion during construction activities. Additionally, the proposed project would be required to adhere to the provisions of the CBC and the County Grading Ordinance, in which erosion control would be required for grading or filling or stripping of vegetation. Therefore, the project would not substantially alter the existing drainage pattern of the

site or area, nor would it create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* than what was previously analyzed in the REGPA PEIR.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

No New Impact.

Impacts from the REGPA PEIR

The REGPA PEIR concluded that because of the extent of such potential groundwater use is unknown, associated effects to local aquifers cannot be determined and are considered potentially significant. Mitigation Measure HYD-1, Mitigation Measure HYD-2, and Mitigation Measure HYD-3 would be implemented to assess groundwater supplies and groundwater recharge. With implementation of Mitigation Measure HYD-1 through Mitigation Measure HYD-3, the impact would be less than significant.

Impacts from the Proposed Project

As outlined in Section 5.IX, Hydrology and Water Quality, a Hydrology and Water Quality Assessment and a Water Supply Assessment were prepared by ERM for the proposed project. As outlined in the Hydrology and Water Quality Assessment, the water demand for this project includes both temporary demands during construction and decommissioning, as well as demand for long-term operation of the solar facility. The project site overlies the Pahrump Valley Groundwater Subbasin (Basin 6-028) and is located approximately two miles north of the Mesquite Valley Groundwater Basin (Basin 6-029). The project's groundwater supply would come from the Pahrump Valley Groundwater Basin. During the total 18-month construction region the project would use an estimated 1,085-acre-feet of water.

The main activity during construction that produces a water demand is dust suppression during ground-disturbing activities. The estimated water demand during the 50-year operational life of the project for normal O&M activities is 0.014 AFY. Decommissioning is anticipated to require water, with a significant portion of the demand driven by dust suppression during ground-disturbing activities. Exact volumes have not yet been determined due to the uncertainty associated with, and the extended time frame before any decommissioning would occur (after the useful life of the project). A Reclamation Plan was prepared in February 2026; however, a detailed, project-specific decommissioning and reclamation plan will be developed and approved prior to the start of decommissioning activities.

The project would include minimal new impervious surfaces associated with access roads, PV solar arrays, and pads for the substation. Additionally, during the final design phase, the project will evaluate the remaining groundwater recharge capacity measures outlined in Mitigation Measure HYD-2 and implement appropriate strategies as necessary. As such, with implementation of REGPA PEIR Mitigation Measure HYD-2, the project would not substantially interfere with groundwater recharge.

As a Hydrology and Water Quality Assessment and a Water Supply Assessment were prepared, REGPA PEIR Mitigation Measure HYD-1 and REGPA PEIR Mitigation Measure HYD-3 have been satisfied for the proposed project.

With implementation of REGPA PEIR Mitigation Measure HYD-2, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

e) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

f) Comply with federal, State, and local statutes and regulations related to solid waste?

No New Impact.

Impacts from the REGPA PEIR

The REGPA concluded that, given the low solid waste generation expected for future solar development projects, and compliance with the County's construction and debris ordinance, ICC Title 21, and REGPA policies, and the remaining capacities of the existing County landfills, impacts associated with adequate landfill for future solar development projects would be less than significant.

Impacts from the Proposed Project

During project construction, waste generated is expected to be minimal and could include waste associated with the presence of workers on-site and packaging for project materials. Solid waste generated at the construction trailers and throughout the site will be hauled and disposed of at a permitted facility by a licensed waste removal contractor. During project operation, waste generated is also expected to be minimal and could include waste associated with the workers on-site and from replaced equipment and packaging materials.

The project Hazardous Materials and Waste Management Plan would identify the waste streams expected to be generated at the site and address solid waste determination procedures, waste storage locations, waste-specific management and disposal requirements, inspection procedures, and waste minimization procedures. Disposal of liquid and solid waste produced during operation of the solar energy facility would be done so as not to impact human health and the environment.

Therefore, the impact for questions e) and f) would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the REGPA PEIR.

Mitigation Measures

See Section 5.IX, Hydrology and Water Quality, for REGPA PEIR Mitigation Measure HYD-2.

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