# Appendix B

## Reclamation Plan

# Preliminary Reclamation Plan- *Draft*

Bonanza Peak Solar Power Generating Facility, Inyo County, California

Prepared for:
Bonanza Peak Solar, LLC

Prepared by:
Stantec Consulting Services Inc.

Draft Date:
Sept. 11, 2026

Project/File:
185706575




Stantec

# Revision Record

| Revision | Description | Author(s) | Date | Quality Check | Date | Independent Review | Date |
|---|---|---|---|---|---|---|---|
| 1 | Updated based on Inyo County comments | Dannique Aalbu | September 2026 | Dale Watson | September 2026 | | |
| | | | | | | | |
| | | | | | | | |

# Disclaimer

The conclusions in the Report titled Preliminary Reclamation Plan are Stantec's professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

Stantec has assumed all information received from Bonanza Peak Solar, LLC (the "Client") and third parties in the preparation of the Report to be correct. While Stantec has exercised a customary level of judgment or due diligence in the use of such information, Stantec assumes no responsibility for the consequences of any error or omission contained therein.

- Draft -

This Report is intended solely for use by the Client in accordance with Stantec's contract with the Client. While the Report may be provided by the Client to applicable authorities having jurisdiction and to other third parties in connection with the project, Stantec disclaims any legal duty based upon warranty, reliance or any other theory to any third party, and will not be liable to such third party for any damages or losses of any kind that may result.

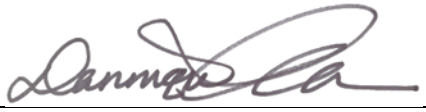
Prepared by:

Signature

Bill Estenger

Printed Name

Reviewed by:



Signature

Dannique Aalbu

Printed Name

Approved by:



Signature

Dale Watson

Printed Name

*- Draft -*

# Table of Contents

**1.0 INTRODUCTION ..... 1**
1.1 Project Description ..... 1
1.2 Purpose and Need ..... 4
1.3 Facility Components ..... 5
1.4 Triggering Events and Expected Lifetime of Project ..... 5
1.5 Decommissioning Sequence ..... 6

**2.0 PROJECT COMPONENTS AND DECOMMISSIONING ACTIVITIES ..... 8**
2.1 Overview of Facilities ..... 8
2.2 Solar Modules ..... 8
2.3 Tracking System and Support ..... 9
2.4 Inverter/Transformer Stations ..... 9
2.5 Electrical Cabling and Conduits ..... 9
2.6 Project Substation ..... 10
2.7 Overhead Tie-in Generation Transmission Line ..... 10
2.8 Operations and Maintenance Facilities ..... 10
2.9 Stormwater Infiltration Basins ..... 10
2.10 Groundwater Wells ..... 10
2.11 Perimeter Fencing, Site Access and Internal Roads ..... 11

**3.0 EXISTING LAND USE AND PERMIT CLOSURE COMPLIANCE ..... 12**
3.1 Existing Conditions ..... 12
3.2 Restoration, Revegetation and Rehabilitation ..... 14
3.3 Closure Compliance ..... 14
3.4 Major Equipment Required for Decommissioning ..... 14

**4.0 REVEGETATION PLAN ..... 16**
4.1 Soil Preparation ..... 16
4.2 Site Planting ..... 16
4.3 Success Criteria ..... 24
4.4 90-Day Establishment Period ..... 25
4.5 Biannual Monitoring ..... 25
4.6 Contingency Plan ..... 25
4.7 Revegetation Expenses ..... 26

**5.0 DECOMMISSIONING COST ESTIMATE SUMMARY ..... 27**
5.1 Decommissioning Risk Over the Lifecycle of a Project ..... 27
5.2 Decommissioning Expenses ..... 28
5.3 Decommissioning Revenues ..... 28
5.4 Decommissioning Cost Summary and Financial Assurance ..... 30

**6.0 REFERENCES ..... 32**

- Draft -

## List of Figures

Figure 1. Project Vicinity ..... 2
Figure 2. Site Layout ..... 3

## List of Tables

Table 1. Primary Components of Project to be Decommissioned ..... 8
Table 2. Typical Access Road Construction Materials ..... 11
Table 3. Manual of California Vegetation and Land Cover Types Mapped within the Survey Area ..... 13
Table 4. Summary Estimate of Equipment and Labor for Decommissioning Activities ..... 15
Table 5. 2025 Floristic Inventory in the Project Area ..... 16
Table 6. 2025 Botanical Survey Results: Special-Status Plant Species in the Project Area ..... 20
Table 7. Supplemental Native Annual Plant Species ..... 21
Table 8. Estimated Revegetation Costs* ..... 26
Table 9. Estimated Decommissioning Expenses ..... 28
Table 10. Estimated Decommissioning Revenues (Salvage Value Only) ..... 29
Table 11. Net Decommissioning Summary ..... 30

## Appendix

Appendix A Seed Count

- Draft -

## Acronyms/Abbreviations

| Acronym | Full Name |
|---|---|
| BMP | Best management practices |
| BLM | Bureau of Land Management |
| CDFA | California Department of Food and Agriculture |
| CDFW | California Department of Fish and Wildlife |
| CDNPA | California Desert Native Plants Act |
| COD | Commercial Operation Date |
| LGP | Low ground pressure |
| MCV | Manual of California Vegetation |
| MW | Megawatt |
| O&M | Operations and maintenance |
| OEM | Original equipment manufacturer |
| PPA | Power Purchase Agreements |
| REDA | Renewable Energy Development Agreement |
| REGPA | Renewable Energy Generation Plan Amendment |
| SEDA | Solar Energy Development Area |

*- Draft -*

# 1.0 Introduction

## 1.1 Project Description

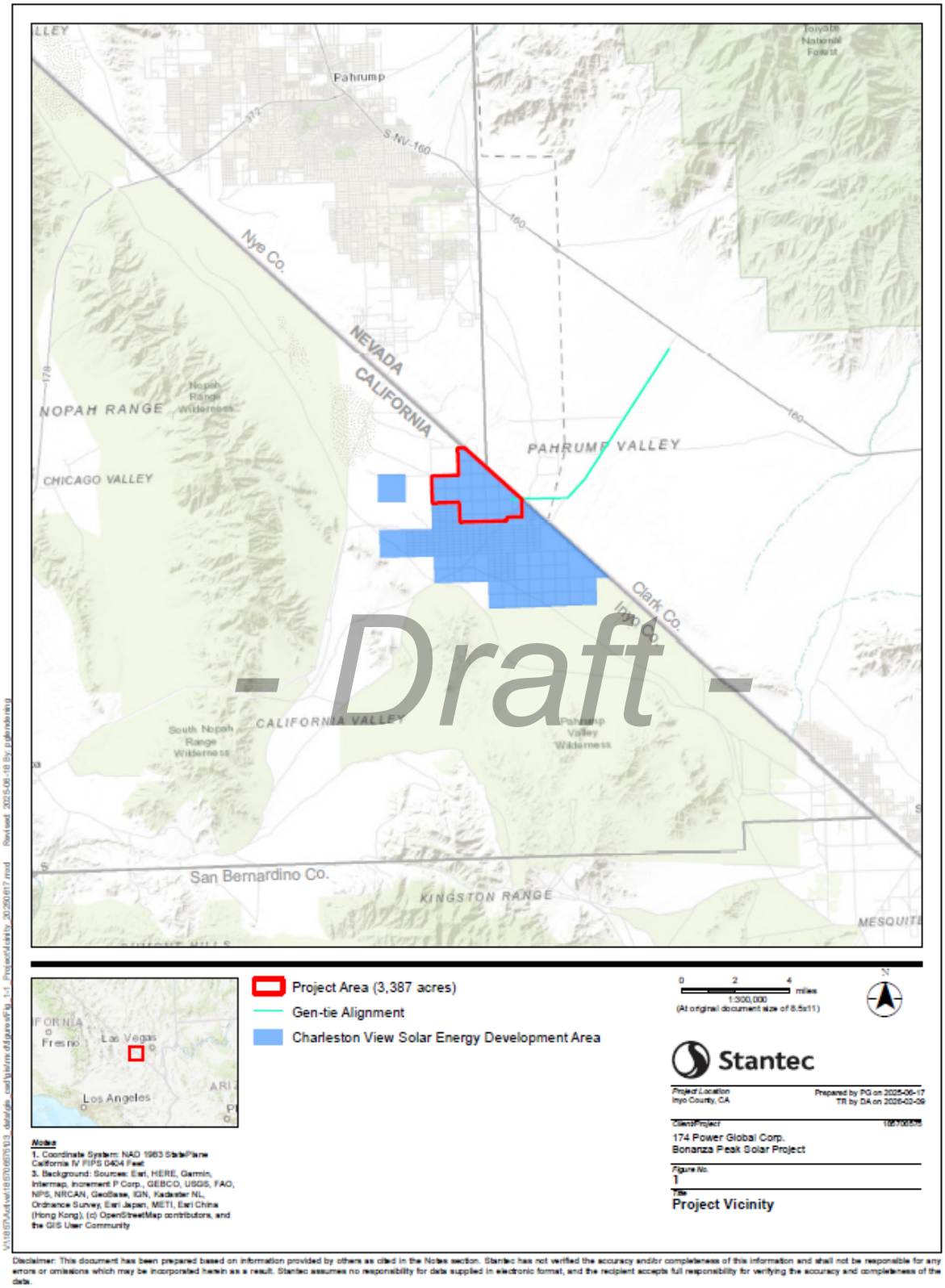
Bonanza Peak Solar, LLC, a wholly owned subsidiary of 174 Power Global, LLC, which is a wholly owned subsidiary of Hanwha Energy USA Holdings Corp. (Applicant) has requested a Renewable Energy Development Agreement (REDA) from Inyo County, California to construct, own, operate, and maintain a utility scale solar photovoltaic energy generating facility on private lands. The requested term for the REDA is 50 years.

The Project would be located in the Charleston View Solar Energy Development Area (SEDA) in southeastern Inyo County, adjacent to the Nevada state line just north of Old Spanish Trail Highway (**Figure 1**).

The Project would include photovoltaic arrays, a substation, an operations and maintenance (O&M) building, internal access roads, and a generation tie-in (gen-tie) line. Within the 3,382-acre proposed Project Area (Project Area), an area of no greater than 2,400 acres would be developed, as dictated by the Inyo County Renewable Energy Generation Plan Amendment (REGPA; Inyo County 2015; **Figure 2**). The Project has a planned net generating capacity of up to 500 megawatts (MW) alternating current ($MW_{[AC])}$ and will be built as one or more phases.

An approximately 9-mile long 230-kilovolt gen-tie line would be located on land managed by the US Bureau of Land Management (BLM) in Nye and Clark Counties, Nevada. The Project would connect to the existing GridLiance 230-kilovolt transmission line at the Trout Canyon switchyard in Nevada. Approximately 0.5 miles of the gen-tie line would be in Inyo County, and the remaining 8.5 miles would be in Nevada.

-Draft-




Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.

*Figure 1. Project Vicinity*

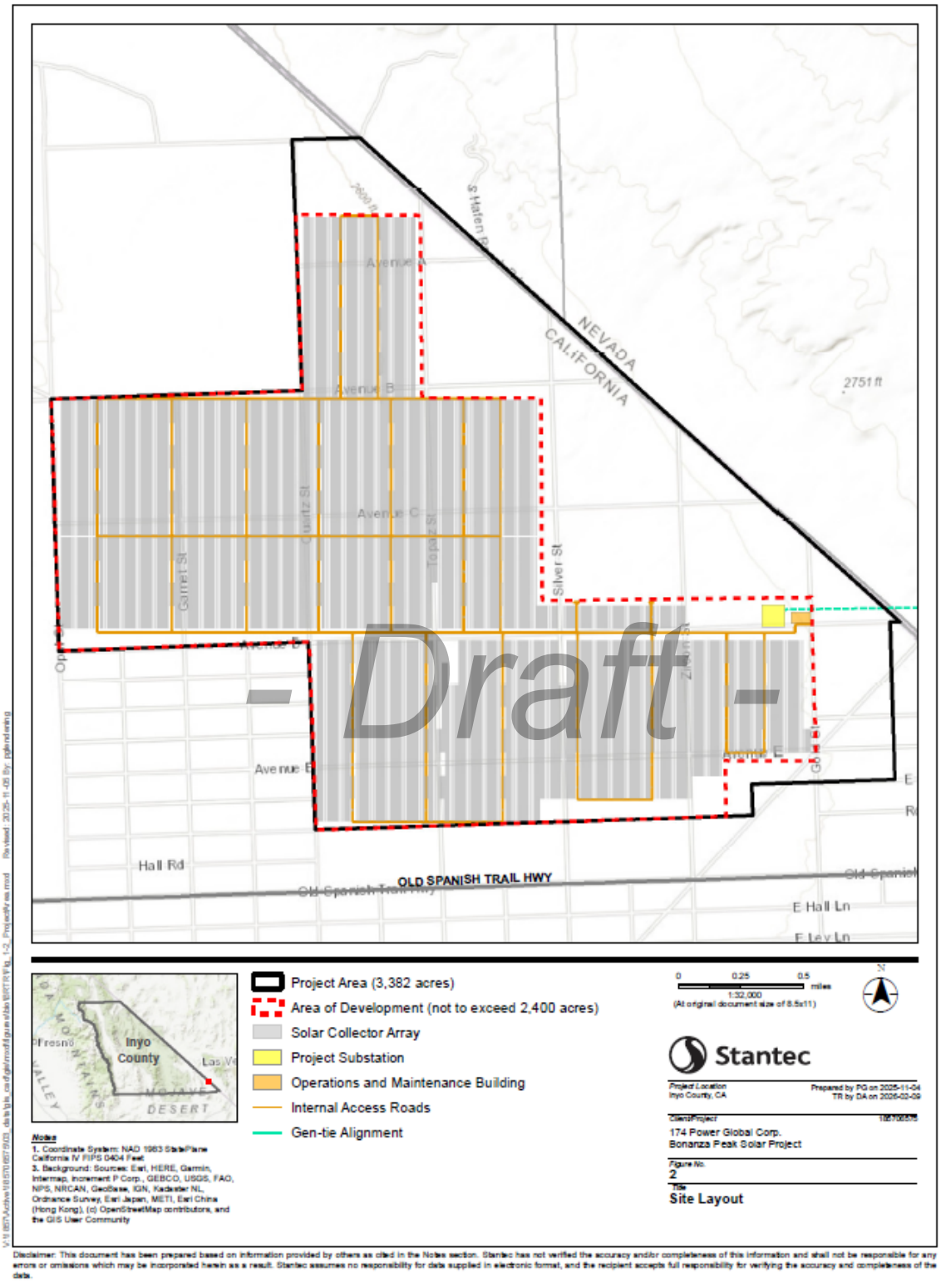



*Figure 2. Site Layout*

## 1.2 Purpose and Need

The Permit Applicant is required by Inyo County (the County), Title 21 to prepare a reclamation plan and provide financial assurances as part of the entitlement process (Inyo County 2025). The following are excerpts from the relevant Title 21 sections:

*Section 21.20.030 RECLAMATION PLAN: Any person who submits an application for a renewable energy impact determination or a renewable energy permit shall, at the time of the submission of the application, submit a plan for reclamation/revegetation of the site of the facility once the facility is decommissioned or otherwise ceases to be operational. The reclamation plan shall be based upon the character of the surrounding area and such characteristics of the property as type of native vegetation, soil type, habitat, climate, water resources, and the existence of public trust resources. Reclamation plans issued pursuant to this chapter shall run with the land affected thereby and shall be binding on all successors, heirs and assigns of the Applicant.*

*In the case of the issuance of a renewable energy impact determination, the county planning commission shall incorporate into the determination, and in the case of a renewable energy permit, shall impose as a condition of approval, a plan for the reclamation/revegetation of the site of the facility at the time that the facility is decommissioned, or otherwise ceases to be operational, and shall establish site-specific criteria for evaluating and monitoring compliance with the approved reclamation plan (Ord. 1158 § 3, 2010).*

*Section 21.20.040 FINANCIAL ASSURANCES: As a condition to the approval of a renewable energy permit, in order to ensure that reclamation will proceed and be accomplished in accordance with an approved reclamation plan, the county planning commission shall require financial assurances from the Applicant as provided herein:*

- Draft -

*A. Financial assurances may take the form of surety bonds, irrevocable letters of credit, trust funds or other mechanisms.*

*B. Public agencies may satisfy financial assurance requirements by using "pledges of revenue" or "budget set aside" as acceptable financial assurances mechanisms.*

*C. The financial assurances shall remain in effect for the duration of the operation and any additional period until reclamation is completed.*

*D. Financial assurances shall be sufficient to cover the costs of fully implementing the reclamation plan.*

*E. The financial assurances shall be made payable to Inyo County and any other affected public agency. However, if a facility has received approval of its financial assurances from a public agency other than the County, the County shall deem those financial assurances adequate for purposes of this section, or shall credit them toward fulfillment of financial assurances required by this section, if they are made payable to the public agency, the County, and otherwise meet the requirements of this title.*

*F. If a permitted facility is sold or ownership is transferred to another person, the existing financial assurances shall remain in force and shall not be released by the county until new financial assurances are secured from the new owner and have been approved by the county.*

*G. The release of financial assurances shall be with the concurrence of all agencies named on the final drainage and hydrology report review, comments and approval financial assurance. The criteria for release of financial assurances, or part of the financial assurances, shall be made part of the reclamation plan. In no case shall the financial assurance be released until reclamation has been completed.*

*H. The amount of financial assurances shall be reviewed annually, or as deemed necessary, by the county planning commission and adjusted, if required, to ensure that the assurances are sufficient to cover the costs of fully implementing the reclamation plan.*

*(Ord. 1158 § 3, 2010)*

In response to the county's Title 21 requirements, this reclamation plan (Plan) provides a description of the decommissioning and restoration phase of the Project. Start of construction is planned for the first quarter of 2027, with a projected commercial operation date (COD) in late 2028. The decommissioning phase is assumed to include the removal of Project facilities as listed in Section 1.1 and shown in **Figure 2**.

This Plan includes an overview of the primary decommissioning activities, including the dismantling and removal of facilities, and subsequent restoration of land. A summary of estimated costs and revenues associated with decommissioning the Project are included in Section 4.0.

## 1.3 Facility Components

The Project would include the following facility components in Inyo County:

- Solar panel modules and associated above ground cabling
- Single access tracking system (module mounting structure)
- Driven steel pile foundations
- Inverter stations with transformers
- Below-ground electrical cabling and conduits
- Perimeter fencing
- Site access and internal roads
- Stormwater basins
- Use of existing groundwater wells
- Project substation
- Overhead gen-tie transmission line
- O&M structure

- Draft -

## 1.4 Triggering Events and Expected Lifetime of Project

Project decommissioning may be triggered by an event such as:

- The end of the power purchase agreement
- The site ceases to produce energy
- The terms of the regulatory agency permits expire

If properly maintained, the expected lifetime of a utility scale solar panel is approximately 30 years with an opportunity for a project lifetime of 50 years or more with equipment replacement and repowering. Depending on market conditions and Project viability, solar arrays may be retrofitted with updated components (e.g., panels, frame, tracking system, etc.) to extend the life of a project. In the event that the modules are not retrofitted, or at the end of the Project's useful life, the panels and associated components will be decommissioned and removed from the Project Area and the Project Area will be

restored in accordance with this Plan or an updated decommissioning plan agreed to between the Project and applicable regulatory bodies at the time of decommissioning.

Components of the solar facilities that have resale value may be sold in the wholesale market. Components with no wholesale value will be salvaged and sold as scrap for recycling or disposed of at an approved offsite licensed solid waste disposal facility.

The value of the individual components of the solar facility will vary with time. In general, the highest component value would be expected at the time of construction with declining value over the life of the Project. Over most of the life of the Project, components such as the solar panels could be sold in the wholesale market for reuse or refurbishment. As efficiency and power production of the panels decrease due to aging and/or weathering, the resale value will decline accordingly. Secondary markets for used solar components include other utility scale solar facilities with similar designs that may require replacement equipment due to damage or normal wear over time; or other buyers (e.g., developers, consumers) that are willing to accept a slightly lower power output in return for a significantly lower price point when compared to new equipment.

Components of the solar facility that have resale value may be sold in the wholesale market. Components with no wholesale value will be salvaged and sold as scrap for recycling or disposed of at an approved offsite licensed solid waste disposal facility (landfill). Decommissioning activities will include removal of the arrays and associated components as listed in Section 1.1 and described in Section 2. All dismantling, removal, recycling, and disposal of materials generated during decommissioning will comply with rules, regulations, and prevailing Federal, State, and local laws at the time of decommissioning is initiated and will use approved local or regional disposal or recycling sites as available. Recyclable materials will be recycled to the furthest extent practicable. Non-recyclable materials will be disposed of in accordance with State and Federal law.

– Draft –

## 1.5 Decommissioning Sequence

Decommissioning activities will begin within 12 months of the Project ceasing operation and are anticipated to be completed within 6 to 12 months from start date. Monitoring and site restoration may extend beyond this period to ensure successful revegetation and rehabilitation. The anticipated sequence of decommissioning and removal is described below; however, overlap of activities is expected.

The proposed decommissioning sequence is as follows:

- Complete appropriate studies and obtain required permits prior to start of decommissioning
- Reinforce access roads, if needed, and prepare site for component removal
- Remove Stormwater Basins
- Destroy/abandon groundwater wells in accordance with Inyo County permit requirements
- Install temporary sediment control fencing and best management practices (BMPs) to protect sensitive resources
- De-energize solar arrays
- Dismantle panels and above ground wiring
- Remove tracking and piles
- Remove inverter/transformer stations, along with support piers and piles
- Abandon in place the underground collection and fiber optic lines

- Remove surface equipment associated with the underground utilities
- Remove perimeter fence along with the post foundations
- Remove substation and overhead transmission line, if decommissioned
- Remove O&M structure, if decommissioned
- Remove gravel access roads and grade areas, as needed, to restore original contours or as agreed upon in landowner leases
- De-compact subsoils, as needed; restore and revegetate disturbed land to preconstruction land use to the extent practicable

- Draft -

# 2.0 Project Components and Decommissioning Activities

## 2.1 Overview of Facilities

The Applicant anticipates utilizing approximately 879,077 solar modules, with a total nameplate generating capacity of approximately 500 $MW_{[AC]}$ on the developed area no greater than 2,400 acres. Statistics and cost estimates provided in this Plan are based on 525-watt bifacial modules, although the final panel manufacturer has not been selected at the time of this report.

Foundations, steel piles, and electrical cabling and conduit will be removed. Access roads may be left in place if requested and/or agreed to by the landowner. The Applicant will communicate with the County to coordinate the repair of public roads damaged or modified during the decommissioning and reclamation process.

Estimated quantities of materials to be removed and salvaged or disposed of are included in this section. All recyclable materials, salvaged and non-salvage, will be recycled to the extent possible. All other non-recyclable waste materials will be disposed of in accordance with state and federal law in a licensed solid waste facility. **Table 1** presents a summary of the primary components of the Project included in this decommissioning plan.

- Draft -

*Table 1. Primary Components of Project to be Decommissioned*

| Component | Quantity | Unit of Measure |
|---|---|---|
| Solar Modules (approximate) 116 x 78 per Inverter Island | 879,077 | Each |
| Tracking System (full equivalent trackers) | 13,572 | Tracker |
| Steel Piles (3 per tracking system) | 40,716 | Each |
| Inverters | 117 | Each |
| Inverter/Transformer Pad | 117 | Each |
| Electrical Cables and Conduits (below ground) | 2,900,000 | Lineal Foot (estimated) |
| Substation | 1 | Each |
| Gen-Tie Transmission Line and Associated Structures | 8.9 | Lineal Mile (estimated) |
| Stormwater Basin (multiple) | 1 | LS |
| Groundwater Well (multiple) | 1 | Each |
| Perimeter Fencing | 58,000 | Lineal Foot (estimated) |
| Internal Access Roads (approximate) | 168,960 | Lineal Foot (estimated) |

## 2.2 Solar Modules

Although subject changes through the final design process, the Applicant would utilize 879,077 Znshinesolar ZXM7-SHLDD144 series (525-watt) bifacial modules or similar type of model for the Project.

Each module assembly (with frame) has a total weight of approximately 75.4 pounds. The modules are approximately 90.0 inches long and 44.6 inches in width and are mainly comprised of non-metallic materials such as silicon, mono- or poly-crystalline glass, composite film, plastic, and epoxies, with an anodized aluminum frame.

Depending on their condition and value at the time of decommissioning, the modules will either be resold, salvaged, or disposed of. It is possible that module components in working condition may be refurbished and sold in a secondary market yielding greater revenue than selling as salvage material.

Considering the unknown condition and value of the modules at the time of decommissioning, it is estimated that approximately 95% of the removed PV panels with be hauled to a licensed reseller and the remaining 5% will be disposed of and hauled to a licensed landfill facility. These percentages are based off Bureau of Land Management (BLM) approved decommissioning plans from similar solar facilities located in the southwestern US.

## 2.3 Tracking System and Support

The solar modules will be mounted on a single axis, single portrait tracking system, such as the Sunfolding T29 Tracker manufactured by Sunfolding or a similar manufacturer. Each full, 3-string tracker is approximately 290 feet in length and will support 78 solar modules. Smaller trackers may be employed at the edges of the layout, to efficiently utilize available space. The tracking system is mainly comprised of galvanized and stainless steel. Steel piles that support the system are comprised of structural steel.

The solar arrays will be deactivated from the surrounding electrical system and made safe for disassembly. The tracker utilizes an airbag system for movement; therefore, no lubricants are present or will need to be disposed of at decommissioning. Electronic components and internal electrical wiring will be removed and salvaged or disposed of. The steel piles will be completely removed.

- Draft -

The supports, tracking system, and piles contain salvageable materials which can likely be sold to provide revenue to offset decommissioning costs. All non-salvageable materials will be disposed of at a licensed landfill facility.

## 2.4 Inverter/Transformer Stations

Inverters and transformers are located inside the array field and will sit on skids and a concrete pad. The inverters and transformers will be deactivated, disassembled, and removed. Depending on condition, the equipment may be sold for refurbishment and reuse. If not reused, they will be salvaged or disposed of at an approved solid waste management facility. Oil is vegetable based and will be collected and disposed of in accordance with state and federal law at the time of decommissioning.

## 2.5 Electrical Cabling and Conduits

The Project's medium voltage electrical collection system will be placed both above and below ground, with a depth of approximately three feet (36 inches) for underground portions. The above ground cabling will be removed from the site and below ground cabling will be abandoned in place.

## 2.6 Project Substation

The Applicant will include a Project substation as shown in **Figure 2**. The substation footprint will be approximately 19 acres and will contain within its perimeter, switches, breakers, two power transformers, control house, and their associated footings. The substation will service Yellow Pine Energy Center and may be retained for future use at the end of the Project life. Although the substation may be retained at the end of the Project life, an estimated decommissioning cost has been included in this Plan.

## 2.7 Overhead Tie-in Generation Transmission Line

An approximately 8.9-mile-long dedicated overhead gen-tie transmission line connects the Project substation to a larger regional interconnection substation at Yellow Pine Energy Center. The gen-tie transmission line will service the Project and may be retained at the end of the Project life. Although the gen-tie line may be retained at the end of the Project life, an estimated decommissioning cost has been included in this Plan.

## 2.8 Operations and Maintenance Facilities

As part of the Project, the Applicant will haul in a trailer to serve as an O&M building. A temporary gravel-topped parking area will also be constructed for Project personnel.

Similar to other temporary facilities, the trailer will be removed in accordance with local laws and will be either sold, recycled, or disposed of via a licensed facility for recycling and/or disposal. The area, including the temporary parking lot, will be restored to pre-project conditions. It is not anticipated that any permanent foundations will be installed to accommodate O&M facilities. Final design will be included with construction permitting.

- Draft -

## 2.9 Stormwater Infiltration Basins

The Project includes multiple stormwater infiltration basins along the western and northern perimeter of the facility. The infiltration basins will be removed at the end of the Project operational period. The infiltration basins will be filled with clean fill, finished with topsoil, and graded to restore preconstruction drainage patterns to the extent practicable.

## 2.10 Groundwater Wells

The Project includes the use of one or more existing private groundwater wells within the Applicant's lease. All utilized wells will be destroyed by a C-57 licensed well contractor at the end of the Project operational period in accordance with Inyo County permitting requirements. Well destruction costs include the contractor's typical removal fee for a moderate depth well (100-300 feet), which includes mobilization, removal of pumping equipment (if present), grout or cement sealing, well destruction documentation, and labor (DWR 2026). Also included is the County permit cost for inspection and monitoring. For purposes of estimating the costs of decommissioning, four wells are assumed to need decommissioning.

## 2.11 Perimeter Fencing, Site Access and Internal Roads

The developed area will include an approximately seven-foot-high security fence around the perimeter of each array site. For security purposes, the security fencing will remain in place during the majority of the decommissioning phase. The security fence will no longer be required upon completion of facility disconnection and removal, at which time, it will be dismantled and removed to allow for full restoration of the site.

A network of internal access roads will allow access to the solar facility equipment. The roads will provide access within the array and be composed of gravel over compacted native soil and will be approximately 20 feet wide including shoulders and total approximately 110,960 feet (21 miles) in length. To be conservative, the decommissioning estimate assumes that all access roads will be completely removed.

During installation of the Project access road, subgrade conditions may be stabilized by the placement of granular fills over soft ground, chemical stabilization, or cement stabilization. This Plan assumes the installation of up to five inches of aggregate base materials over compacted native substrate for the access drives. The estimated quantity of these materials is provided in **Table 2.**

*Table 2. Typical Access Road Construction Materials*

| Item | Quantity | Unit |
|---|---|---|
| Gravel or granular fill; five inches thick | 59,231 | Cubic Yards |

- Draft -

Decommissioning activities include the removal and stockpiling of aggregate materials on site for salvage preparation. It is conservatively assumed that all aggregate materials will be removed from the Project Area and hauled up to five miles from the Project Area. Following removal of aggregate, the access road areas will be regraded to match preconstruction drainage and surrounding grade, de-compacted with deep ripper or chisel plow (ripped to 18 inches), backfilled with native subsoil and topsoil, as needed, and land contours restored as near as practicable to preconstruction conditions.

# 3.0 Existing Land Use and Permit Closure Compliance

## 3.1 Existing Conditions

The Project would be located on predominantly flat, arid, sparsely vegetated, open land in the southern portion of the Pahrump Valley. Elevations range from 2,560 feet to 2,660 feet above mean sea level. It is within the Basin and Range Geomorphic Province, characterized by interior drainage to lakes and playas, with horst and graben topography (i.e., basins and ranges).

The Project Area is located on private land currently designated by the county as open space greater than 40 acres in size (OS-40). The OS-40 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 (Inyo County 2002).

The Project Area is undeveloped except for a grid of unimproved dirt roads that divide it into quarter-sections; while some of the roads are passable, many are partially vegetated and in poor driving condition. An abandoned 40-foot by 40-foot fenced solar array exists on Avenue D between Topaz Street and Silver Street. In addition, a fenced-in junkyard with boats, trailers, and abandoned vehicles is located at the northeast corner of Avenue E and Gold Street. Off-road tire tracks and other signs of disturbance, including windblown trash and cattle dung, are also present.

- Draft -

On a broad scale, vegetation within the Project Area is predominantly creosote bush–white bursage scrub *(Larrea tridentata – Ambrosia Dumosa)* shrubland alliance on the eastern third and a mixture of shadscale scrub (*Atriplex confertifolia*) shrubland alliance and allscale scrub (*Atriplex polycarpa*) shrubland alliance on the western two-thirds. 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*).

A botanical survey was conducted within the proposed Project Area in 2025 (Stantec 2025). Eleven Manual of California Vegetation (MCV) vegetation alliances and land cover types were mapped within the existing site, nine of which were further broken down into 18 associations (CNPS 2026). One alliance characterized by invasive species was not broken down past the alliance level and the developed land cover type was broken down into two sub-types. One non-native alliance, saltlover flat (*Halogeton glomeratus*) Sparsely Vegetated Clay Flat is not in the MCV, was not assigned an association, and was described for the purposes of this Project. The most abundant MCV vegetation alliance within the existing site is shadscale scrub (912.2 acres), followed by creosote bush – white bursage scrub (*Larrea tridentata – Ambrosia dumosa*) Shrubland Alliance (617.5 acres); together, these two alliances account for more than half of the existing site. Of the 18 MCV vegetation associations, 5 (407.4 acres) are considered sensitive natural communities by the California Department of Fish and Wildlife (CDFW). **Table 3** lists all MCV/land cover types, acreages, and sensitivity status.

The existing site is located in or adjacent to energy infrastructure and developments, BLM lands that have been used for recreational vehicles, and highway corridors. Some of the vegetation within the existing site is highly disturbed by human activity and has been impacted by grading, grazing, and alteration of hydrology. Because of the historical, varying, and ongoing disturbance within and surrounding the existing

site, the vegetation communities support a high number of non-native and invasive species such as saltlover, Russian thistle (*Salsola tragus*), and other non-native grasses and forbs.

*Table 1. Manual of California Vegetation and Land Cover Types Mapped within the Survey Area*

| Code | Alliance Association(s) | Sensitive (Y/N) | Acres |
|---|---|---|---|
| **Herbaceous** | | | |
| 22.310.00 | *Chorizanthe rigida – Geraea canescens* Desert Pavement Sparsely Vegetated Alliance (Rigid Spineflower – Hairy Desert Sunflower) | – | 65.0 |
| 33.380.01 | *Chorizanthe rigida – Geraea canescens* Desert Pavement | Y | 65.0 |
| N/A | *Halogeton glomeratus* Sparsely Vegetated Clay Flat (Saltlover Flat)[1] | N | 17.4 |
| 41.100.00 | *Sphaeralcea ambigua* Herbaceous Alliance (Desert Globemallow Herbaceous Scrub) | – | 195.7 |
| 41.100.01 | Sphaeralcea ambigua | N | 195.7 |
| | | **Herbaceous Subtotal** | **278.1** |
| **Shrub** | | | |
| 33.200.00 | *Ambrosia salsola – Bebbia juncea* Shrubland Alliance (Cheesebush – Sweetbush Scrub) | – | 27.9 |
| 33.200.04 | *Ambrosia salsola – Atriplex confertifolia* | N | 26.3 |
| 33.200.08 | *Senna armata – Ambrosia salsola* | N | 1.6 |
| 33.060.00 | *Atriplex canescens Shrubland* Alliance (Fourwing Saltbush Scrub) | – | 23.7 |
| 33.060.02 | Atriplex canescens | N | 23.7 |
| 36.320.00 | *Atriplex confertifolia* Shrubland Alliance (Shadscale Scrub) | – | 912.2 |
| 36.320.03 | Atriplex confertifolia – Ambrosia dumosa | N | 727.7 |
| 36.320.06 | Atriplex confertifolia – Atriplex canescens | N | 61.3 |
| 36.320.07 | Atriplex confertifolia – Lycium andersonii | Y | 123.2 |
| 36.310.00 | *Ambrosia dumosa* Shrubland Alliance (White Bursage Scrub) | – | 24.5 |
| 36.310.01 | Ambrosia dumosa Association | Y | 24.5 |
| 33.185.00 | *Ephedra nevadensis – Lycium andersonii – Grayia spinosa* Shrubland Alliance (Nevada Joint Fir – Anderson's Boxthorn – Spiny Hop Sage Scrub) | – | 328.0 |
| 33.360.02 | Lycium andersonii (provisional) | Y | 194.7 |
| 33.185.01 | Lycium cooperi (provisional) | N | 124.6 |
| 33.280.04 | Ephedra nevadensis – Lycium andersonii | N | 8.7 |
| 33.010.00 | *Larrea tridentata* Shrubland Alliance (Creosote Bush Scrub) | – | 419.9 |
| 33.140.04 | Larrea tridentata | N | 223.4 |
| 33.010.17 | Larrea tridentata – Atriplex confertifolia | N | 182.4 |
| 33.010.19 | *Larrea tridentata* / Cryptogamic crust | N | 14.1 |

- Draft -

| Code | Alliance Association(s) | Sensitive (Y/N) | Acres |
|---|---|---|---|
| 33.140.00 | *Larrea tridentata – Ambrosia dumosa* Shrubland Alliance (Creosote Bush – White Bursage Scrub) | – | 617.5 |
| 33.140.42 | Larrea tridentata – Ambrosia dumosa | N | 543.4 |
| 33.140.39 | Larrea tridentata – Ambrosia dumosa - Atriplex confertifolia | N | 35.2 |
| 33.140.35 | Larrea tridentata – Ambrosia dumosa / Cryptogamic crust | Y | 38.9 |
| | | **Shrub Subtotal** | **2,353.7** |
| **Other** | | | |
| **N/A** | **Developed** | **–** | **76.6** |
| | Unpaved Road | N | 72.4 |
| | Rural | N | 4.2 |
| | | **Other Total** | **2,708.4** |

1. Vegetation community is not currently described in the MCV and therefore not included in the California Department of Fish and Wildlife's Natural Community List.

## 3.2 Restoration, Revegetation and Rehabilitation

Portions of the Developed Area that have been excavated and backfilled will be restored, as near as practicable, to preconstruction contours, unless a community benefit for retaining the contours current at time of decommissioning can be shown. Soils compacted during de-construction activities will be de-compacted, as necessary, to restore the land to preconstruction land use. Topsoil will be placed on disturbed areas, as needed, and seeded with vegetation from a reputable seed supplier or with vegetation either present along the perimeter of the disturbed areas or present on adjacent land that is under the Project owner's control (Section 4, Revegetation Plan).

- Draft -

## 3.3 Closure Compliance

Surface water conditions at the Project Area will be reassessed prior to the decommissioning phase. The Applicant will obtain the required water quality and streambed alteration permits from the Lahontan Regional Water Quality Control Board and the CDFW, respectively, prior to decommissioning the Project. Required construction stormwater permits will also be obtained, and a Stormwater Pollution Prevention Plan prepared describing the protection needed to reflect conditions present at the time of decommissioning. Erosion and sediment control BMPs may include construction entrances, temporary seeding, permanent seeding, mulching, erosion control matting, silt fence, filter berms, and filter socks.

Additional appropriate plans and permits will be prepared and/or acquired as listed in the pending agency Project Conditions of Approval.

## 3.4 Major Equipment Required for Decommissioning

The activities involved in decommissioning the Project include removal of the Project components. Restoration activities include backfilling of pile and foundation sites; de-compaction of subsoils; grading of surfaces to preconstruction land contours and revegetation of the disturbed areas.

Equipment required for the decommissioning activities is similar to what is needed to construct the solar facility and may include, but is not limited to: small cranes, low ground pressure (LGP) track mounted excavators, backhoes, LGP track bulldozers, LGP off-road end-dump trucks, front end loaders, deep rippers, water trucks, disc plows and tractors to restore subgrade conditions, and ancillary equipment. Standard dump trucks will be used to transport material removed from the site to disposal facilities.

This Project is a large solar site, compared with most utility scale installations at this time. The equipment needed to complete the removal of Project facilities is summarized in **Table 4.**

*Table 4. Summary Estimate of Equipment and Labor for Decommissioning Activities*

| Component | Equipment | Approximate Labor Hours (including equipment operators) |
|---|---|---|
| De-energize site and remove solar modules | Utility truck, forklift, semi-truck | 38,000 |
| Tracking system and pile removal | Utility truck, forklift, excavator, semi-truck | 74,300 |
| Inverter/transformer stations and piers | Utility truck, forklift, semi-truck | 11,000 |
| Electrical cables (above and below ground) and conduits | Utility truck, cable rig, forklift, semi-truck | 10,100 |
| Access road and infiltration basin removal | Bulldozer, front end loader, dump truck | 61,00 |
| Perimeter fencing | Utility truck, forklift, excavator, semi-truck | 9,700 |
| Site decompaction, restoration and revegetation (long term monitoring not included) | Bulldozer, forklift, tractor with disc | 19,000 |

- Draft -

# 4.0 Revegetation Plan

The proposed revegetation plan is based on the existing conditions within the Project Area and information gathered from the floristic surveys to date. Adjustments to the revegetation plan may be made based on agreed on mitigation requirements adopted through the Programmatic Environment Impact Report (PEIR) and conditions and measures required by the water quality 401 certification, streambed alteration agreement, and other Project-required regulatory permits.

## 4.1 Soil Preparation

Following solar infrastructure and aggregate removal, the solar field internal access roads will be graded, de-compacted with a deep ripper or chisel plow to a depth of 18 inches and backfilled with native subsoil and topsoil as needed. Project Area locations that have been impacted by excavation or backfilling will be restored and land contours will be restored to preconstruction conditions to the maximum extent feasible.

Project Area soils that have been compacted during solar farm construction and implementation activities will be de-compacted to restore them to preconstruction conditions. In addition, topsoil will be added, as necessary, to areas that have experienced disturbance. Soil decompaction and the addition of topsoil to selected areas will re-establish baseline conditions for revegetation of the Project Area.

## 4.2 Site Planting

**Table 5** lists the floristic inventory from the 2025 botanical surveys. Botanical nomenclature follows Jepson eFlora (2025). **Table 6** includes a summary list of special-status plant species detected during the 2025 botanical surveys.

- Draft -

*Table 5. 2025 Floristic Inventory in the Project Area*

| Scientific Name | Common Name | Habit | Status[1] |
|---|---|---|---|
| **Agavaceae (Agave Family)** | | | |
| *Yucca schidigera* | Mojave yucca | tree-like | native, CDNPA |
| **Apocynaceae (Milkweed Family)** | | | |
| *Asclepias erosa* | desert milkweed | perennial herb | native |
| **Asteraceae (Sunflower Family)** | | | |
| *Acamptopappus shockleyi* | Shockley's goldenhead | shrub | native |
| *Acamptopappus sphaerocephalus var. sphaerocephalus* | goldenhead | shrub | native |
| *Ambrosia dumosa* | white bursage | shrub | native |
| *Ambrosia salsola* | cheesebush | shrub | native |
| *Baileya multiradiata* | desert marigold | perennial herb | native |
| *Baileya pleniradiata* | wooly marigold | annual, perennial herb | native |
| *Encelia virginensis* | Virgin River encelia | shrub | native |

| Scientific Name | Common Name | Habit | Status[1] |
|---|---|---|---|
| *Gutierrezia microcephala* | sticky snakeweed | shrub (stem succulent) | native |
| *Gutierrezia sarothrae* | matchweed | shrub | native |
| *Psilostrophe cooperi* | paper flower | shrub | native |
| *Stephanomeria pauciflora* | wire lettuce | perennial herb | native |
| *Tetradymia axillaris* | catclaw horsebrush | shrub | native |
| *Xylorhiza tortifolia* | Mojave woodyaster | perennial herb | native |
| **Brassicaceae (Mustard Family)** | | | |
| *Lepidium fremontii* | desert pepper grass | perennial herb | native |
| *Stanleya pinnata var. pinnata* | prince's plume | perennial herb, shrub | native |
| **Cactaceae (Cactus Family)** | | | |
| *Cylindropuntia echinocarpa* | silver cholla | shrub (stem succulent) | native, CDNPA |
| *Cylindropuntia ramosissima* | pencil cactus | shrub (stem succulent) | native, CDNPA |
| *Opuntia basilaris var. basilaris* | beavertail cactus | shrub (stem succulent) | native, CDNPA |
| **Chenopodiaceae (Goosefoot Family)** | | | |
| *Atriplex canescens* | fourwing saltbush | shrub | native |
| *Atriplex confertifolia* | spiny saltbush | shrub | native |
| *Atriplex polycarpa* | allscale saltbush | shrub | native |
| *Halogeton glomeratus* | saltlover | annual herb | noxious, Cal-IPC M, CDFA B* |
| *Krascheninnikovia lanata* | winter fat | shrub | native |
| *Salsola tragus* | Russian thistle | annual herb | noxious, Cal-IPC L, CDFA C |
| **Convolvulaceae (Morning Glory Family)** | | | |
| *Cuscuta denticulata* | desert dodder | annual herb, vine (parasitic) | native |
| **Ephedraceae (Ephedra Family)** | | | |
| *Ephedra funerea* | Death Valley ephedra | shrub | native |
| *Ephedra nevadensis* | Nevada ephedra | shrub | native |
| *Ephedra torreyana* | Torrey's ephedra | shrub | rare, CRPR 2B.1 |
| **Euphorbiaceae (Spurge Family)** | | | |
| *Euphorbia albomarginata* | rattlesnake sandmat | perennial herb | native |
| **Euphorbiaceae (Spurge Family)** | | | |
| *Astragalus lentiginosus var. fremontii* | Fremont's milk-vetch | annual, perennial herb | native |

- Draft -

| Scientific Name | Common Name | Habit | Status[1] |
|---|---|---|---|
| *Astragalus preussii var. preussii* | Preuss' milk-vetch | perennial herb | rare, CRPR 2B.1 |
| *Astragalus tidestromii* | Tidestrom's milk-vetch | perennial herb | rare, CRPR 2B.2 |
| *Hoffmannseggia glauca* | pig-nut | perennial herb | native |
| *Neltuma odorata* | honey mesquite | tree, shrub | native, CDNPA |
| *Psorothamnus arborescens* | Mojave indigo bush | shrub | native |
| *Senna armata* | desert senna | shrub | native |
| **Geraniaceae (Geranium Family)** | | | |
| *Erodium cicutarium* | coastal heron's bill | annual herb | invasive |
| **Krameriaceae (Rhatany Family)** | | | |
| *Krameria erecta* | little-leaved ratany | shrub | native |
| **Malvaceae (Mallow Family)** | | | |
| *Sphaeralcea ambigua var. ambigua* | desert globemallow | perennial herb | native |
| *Sphaeralcea angustifolia* | narrow-leaved desert mallow | shrub (stem succulent) | native |
| **Onagraceae (Evening Primrose Family)** | | | |
| *Oenothera suffrutescens* | linda tarde | perennial herb | native |
| **Plantaginaceae (Plantain Family)** | | | |
| *Plantago ovata* | desert plantain | annual herb | native |
| **Poaceae (Grass Family)** | | | |
| *Bromus rubens* | red brome | annual grass | noxious, Cal-IPC H |
| *Bromus tectorum* | cheat grass | annual grass | noxious, Cal-IPC H, CDFA C |
| *Dasyochloa pulchella* | low woolly grass | perennial grass | native |
| *Elymus elymoides* | squirrel-tail grass | perennial grass | native |
| *Hilaria rigida* | big galleta | perennial grass | native |
| *Schismus arabicus* | schismus | annual grass | invasive |
| *Schismus barbatus* | old han schismus | annual grass | invasive |
| *Sporobolus airoides* | alkali sacaton | perennial grass | native |
| *Stipa hymenoides* | rice grass | perennial grass | native |
| *Stipa speciosa* | desert needle grass | perennial grass | native |
| **Polygonaceae (Buckwheat Family)** | | | |
| *Chorizanthe rigida* | rigid spineflower | annual herb | native |
| *Eriogonum inflatum* | desert trumpet | perennial herb | native |
| *Eriogonum spp.* | buckwheat | annual herb | native |
| *Eriogonum trichopes* | little desert buckwheat | annual herb | native |
| **Solanaceae (Nightshade Family)** | | | |

- Draft -

| Scientific Name | Common Name | Habit | Status[1] |
|---|---|---|---|
| *Lycium andersonii* | Anderson thornbush | shrub | native |
| *Lycium cooperi* | Cooper's box thorn | shrub | native |
| *Lycium pallidum var. oligospermum* | rabbit thorn | shrub | native |
| **Viscaceae (Mistletoe Family)** | | | |
| *Phoradendron californicum* | California mesquite mistletoe | shrub (parasitic) | native |

- Draft -

| Scientific Name | Common Name | Habit | Status[1] |
|---|---|---|---|
| **Zygophyllaceae (Caltrop Family)** | | | |
| *Larrea tridentata* | creosote bush | shrub | Native |

1. Status Codes:
California Invasive Plant Council (Cal-IPC):
H: high
M: moderate
L: low
California Department of Food and Agriculture (CDFA) Weed Pest:
B: pests, if present in California, are of limited distribution
C: pests that score low under CDFW analysis and/or are of common occurrence and generally distributed in California.
*: California Code of Regulations Section 4500 Noxious Weed Species
For the purposes of this report, Cal-IPC H and any species on a CDFA list were classified as noxious and mapped.
CRPR (California Rare Plant Rank) Codes and Extensions:
2B Plants rare, threatened, or endangered in California but more common elsewhere
.1 Plants rare, threatened, or endangered in California but more common elsewhere; seriously threatened in California
.2 Plants rare, threatened, or endangered in California but more common elsewhere; fairly threatened in California
California Desert Native Plants Act (CDNPA): Section 80073 plants, or any part thereof, may not be harvested except under a permit issued by the commissioner or the sheriff of the county in which the native plants are growing.

*Table 6. 2025 Botanical Survey Results: Special-Status Plant Species in the Project Area*

| *Scientific Name* (Common Name) | Status: FESA/CESA/CRPR/CDNPA[1] | Number of Plants Observed |
|---|---|---|
| **Agavaceae (Cactus Family)** | | |
| *Yucca schidigera* (Mojave yucca) | –/–/–/80073 | 1 |
| *Cactaceae* (Cactus Family) | | |
| *Cylindropuntia echinocarpa* (silver cholla) | –/–/–/80073 | 54 |
| *Cylindropuntia ramosissima* (pencil cholla) | –/–/–/80073 | 2 |
| *Opuntia basilaris var. basilaris* (beavertail cactus) | –/–/–/80073 | 14 |
| **Ephedraceae (Ephedra Family)** | | |
| *Ephedra torreyana* (Torrey's ephedra) | –/–/2B.1/– | 874 |
| **Fabaceae (Legume Family)** | | |
| *Astragalus preussii var. preussii* (Preuss' milk-vetch) | –/–/2B.1/– | 337 |
| *Astragalus tidestromii* (Tidestrom's milk-vetch) | –/–/2B.2/– | 9 |
| *Neltuma odorata* (honey mesquite) | –/–/–/80073 | 152 |

- Draft -

Five species covered under the CDNPA were mapped within the Project Area. The CDNPA species will require a permit issued by the county for any harvesting resulting from Project implementation.

Although the 2025 botanical surveys constituted a complete floristic inventory, according to the U.S. Drought Monitor, the surveys were conducted during a time of extreme drought. As such, the list is notably missing annual species commonly observed in the area and expected to be observed on site. For example, there were no observations of annual *Phacelia* spp. (phacelias) or pincushions *(Chaenactis* spp.) Another notable absence was the lack of observation of annual species in the *Boraginaceae* (Borage Family) such as *Cryptantha* spp. (cryptanthas), fiddlenecks *(Amsinckia* spp.), and popcorn flowers (*Plagiobothrys*). Prior to finalization of a seed mix, additional observations should be made regarding the common annual species on site. Alternatively, native annual species detected in more favorable conditions during 2011 floristic surveys (**Table 7**) could also provide additional native annual species (Hidden Hills Solar, LLC 2011).

For revegetation of the developed area after Project decommissioning, a seed mix composed of seeds from the common species in **Table 6** and **Table 7**, plus additional native annuals appropriate to the area, will be created and supplied by S&S Seeds, Inc. based out of Carpinteria, California, or a reputable supplier.

*Table 7. Supplemental Native Annual Plant Species*

| Scientific Name | Common Name | Habit | Status[1] |
|---|---|---|---|
| **Asteraceae (Sunflower Family)** | | | |
| *Calycoseris wrightii* | white tackstem | annual herb | native |
| *Chaenactis carphoclinia* | -- | annual herb | native |
| *Chaenactis fremontii* | Fremont pincushion | annual herb | native |
| *Chaenactis macrantha* | Mohave pincushion | annual herb | native |
| *Chaenactis stevioides* | Esteve pincushion | annual herb | native |
| *Eriophyllum wallacei* | Wallace eriophyllum | annual herb | native |
| *Glyptopleura marginata* | keysia | annual herb | native |
| *Malacothrix coulteri* | snake's head | annual herb | native |
| *Malacothrix glabrata* | desert dandelion | annual herb | native |
| *Monoptilon bellioides* | Mojave desert star | annual herb | native |
| *Pectis papposa* | manybristle chinchweed | annual herb | native |
| *Prenanthella exigua* | thorny skeleton plant | annual herb | native |
| *Psathyrotes annua* | annual psathyrotes | annual herb | native |
| *Rafinesquia neomexicana* | desert chicory | annual herb | native |
| *Stephanomeria exigua* | small wirelettuce | annual herb | native |
| **Boraginaceae (Borage Family)** | | | |
| *Amsinckia tessellata* | devil's lettuce | annual herb | native |
| *Cryptantha barbigera* | bearded cryptantha | annual herb | native |
| *Cryptantha micrantha* | purple root cryptantha | annual herb | native |
| *Cryptantha nevadensis* | Nevada forget me not | annual herb | native |

- Draft -

| Scientific Name | Common Name | Habit | Status[1] |
|---|---|---|---|
| *Cryptantha pterocarya* | winged nut forget me not | annual herb | native |
| *Cryptantha recurvata* | curve nut cryptantha | annual herb | native |
| *Greeneocharis circumscissa* | | annual herb | native |
| *Johnstonella angustifolia* | narrow-leaved Johnstonella | annual herb | native |
| *Lappula redowskii var. cupulata* | cupped Redowski's stickseed | annual herb | native |
| *Pectocarya heterocarpa* | chuckwalla pectocarya | annual herb | native |
| *Pectocarya platycarpa* | broad nutted comb bur | annual herb | native |
| *Pectocarya recurvata* | arch nutted comb bur | annual herb | native |
| *Simpsonanthus jonesii* | Simpson's popcornflower | annual herb | native |
| *Amsinckia tessellata* | devil's lettuce | annual herb | native |
| **Brassicaceae (Mustard Family)** | | | |
| *Caulanthus cooperi* | Cooper caulanthus | annual herb | native |
| *Caulanthus lasiophyllus* | California mustard | annual herb | native |
| *Descurainia pinnata ssp. glabra* | smooth western tansy mustard | annual herb | native |
| *Lepidium lasiocarpum* | shaggyfruit pepperweed | annual herb | native |
| *Streptanthella longirostris* | long beaked twist flower | annual herb | native |
| **Euphorbiaceae (Spurge Family)** | | | |
| *Euphorbia micromera* | Sonoran sandmat | Annual herb | native |
| **Fabaceae (Spurge Family)** | | | |
| *Astragalus lentiginosus var. fremontii* | Fremont's milk-vetch | annual, perennial herb | native |
| *Astragalus nuttallianus* | Nuttall locoweed | annual herb | native |
| **Hydrophyllaceae (Waterleaf Family)** | | | |
| *Phacelia crenulata var. ambigua* | heliotrope phacelia | annual herb | native |
| *Phacelia fremontii* | Fremont's phacelia | annual herb | native |
| *Phacelia ivesiana* | Ives' phacelia | annual herb | native |
| **Malvaceae (Mallow Family)** | | | |
| *Eremalche rotundifolia* | desert five-spot | Annual herb | native |
| **Namaceae (Nama Family)** | | | |
| *Nama demissa* | purplemat | annual herb | native |
| **Onagraceae (Evening Primrose Family)** | | | |
| *Chylismia brevipes* | yellow cups | annual, perennial herb | native |
| *Chylismia claviformis ssp. integrior* | clavate fruited primrose | annual, perennial herb | native |
| *Eremothera boothii* | Booth's sun cup | annual herb | native |

- Draft -

| Scientific Name | Common Name | Habit | Status[1] |
|---|---|---|---|
| *Eremothera refracta* | narrow-leaved primrose | annual herb | native |
| *Oenothera primiveris* | yellow desert evening primrose | annual herb | native |
| **Papaveraceae (Poppy Family)** | | | |
| *Eschscholzia glyptosperma* | desert gold poppy | annual herb | native |
| **Plantaginaceae (Plantain Family)** | | | |
| *Antirrhinum filipes* | tangled snapdragon | annual herb | native |
| *Antirrhinum kingii* | king's snapdragon | annual herb | native |
| **Poaceae (Grass Family)** | | | |
| *Festuca octoflora* | sixweeks grass | annual grass | native |
| **Polemoniaceae (Phlox Family)** | | | |
| *Chorizanthe rigida* | rigid spineflower | annual herb | native |
| **Polygonaceae (Buckwheat Family)** | | | |
| *Aliciella hutchinsifolia* | desert pale gilia | annual herb | native |
| *Gilia cana ssp. speciformis* | showy gilia | annual herb | native |
| *Gilia stellata* | star gilia | annual herb | native |
| *Ipomopsis polycladon* | branching gilia | annual herb | native |
| *Langloisia setosissima ssp. setosissima* | lilac sunbonnet | annual herb | native |
| *Linanthus jonesii* | Jones linanthus | annual herb | native |
| *Loeseliastrum matthewsii* | desert calico | annual herb | native |
| *Loeseliastrum schottii* | Schott gilia | annual herb | native |
| **Polygonaceae (Buckwheat Family)** | | | |
| *Chorizanthe brevicornu var. brevicornu* | brittle spine flower | annual herb | native |
| *Chorizanthe rigida* | rigid spiny herb | annual herb | native |
| *Eriogonum brachypodum* | parry's buckwheat | annual herb | native |
| *Eriogonum nidularium* | whisk broom | annual herb | native |
| *Eriogonum trichopes* | little desert buckwheat | annual herb | native |

Source: Modified to update nomenclature and only include common annual plant species. From TABLE 5.2-3 *Plant Species Observed within the HHSEGS Site and 250-foot Buffer during 2011 Surveys*, Section 5.2 Biological resources, Volume 1, Application for Certification for Hidden Hills Solar Electric Generating System. (Hidden Hills Solar, LLC. 2011).

- Draft -

The site would be seeded, covered with a layer of mulch, and watered immediately prior to the regional rainy season, allowing for establishment of a vegetative cover similar to the conditions currently present on the site. The revegetation of the decommissioned Developed Area will be performed initially by the placement of the native seed mix. To avoid compaction by vehicles or machinery of the de-compacted soils and recently deposited topsoil, hand broadcasting or hydroseeding will be the approved method for initial seeding/revegetation. Timing of the seeding will be crucial to the successful germination and

establishment of new seedlings. Optimal timing of the seeding will be during the regional rainy season (likely the month of December), optimally right before a sizeable rain event. Based on the approximate 2,380-acre developed area, it is recommended that 47,600 lbs. of seed mix (50 pounds per acre) be spread evenly throughout the entirety of the site. After seeding, if hand broadcast, the site will be covered with a thin layer of mulch to prevent seed mix from blowing away, retain soil moisture, and increase the likelihood of successful seed germination and recruitment; if hydroseeding is used an appropriate hydro mulch should be used in the applied mixture to accomplish the same goals.

The current proposed seed mix has been developed as a non-irrigated mix given the dry, arid conditions present within the region of the Project Area. These desert species thrive in this climate and providing irrigation may do more harm than good. Allowing the seed to germinate using natural rain events will result in stronger plans and a higher percent survival.

Harvesting of the existing vegetation on the developed area is not recommended due to the period of time between construction and decommissioning. The likely success of the survival of the existing shrubs (e.g., creosote bush) is low and the species of shrubs on the site do not generally respond well to being transplanted.

## 4.3 Success Criteria

Success criteria (e.g., germination, plant survival, and plant cover over time) have been determined based on the current conditions of the site prior to Project implementation. Monitoring/maintenance activities will be performed by a qualified biologist/botanist and will last at least five years.

- Draft -

- After five years, vegetative cover in scrub/shrub communities at the Project Area will be equal to or greater than 50 percent of what is currently present at the site, as determined by a qualified biologist/botanist. Pre-Project shrub/sub-shrub vegetative cover is estimated at 15 percent average in scrub/shrub communities, with an average cover of 8 percent in the herbaceous stratum.
- After five years, vegetative cover in herbaceous communities at the Project Area will be equal to or greater than 50 percent of what is currently present at the site, as determined by a qualified biologist/botanist. Pre-Project average herbaceous vegetative cover is estimated at five percent. In herbaceous areas currently dominated by non-native annual species, pre-Project averages may reflect a higher cover than would be present if non-native species were absent. Success criteria in these areas should take into account presence of non-native and noxious weed species.
- Non-native, invasive plant species cover shall not exceed the pre-Project implementation percent cover.

Along with the above quantitative assessment, qualitative criteria will be used to determine success. Qualitative monitoring will serve to document site conditions such as potential erosion concerns, non-native species regrowth/colonization, and general vegetative development.

The following qualitative criteria will be used:

- Shrub and sub-shrub seedlings shall be healthy and have observable growth each year.
- Vegetation shall have no signs of drought stress.

As part of the quantitative assessment, plant cover should be comparable to the surrounding undisturbed lands with indigenous or native vegetation. Additionally, it is important to note that adjacent areas will not be experiencing non-native species removal and therefore will remain somewhat disturbed.

The revegetation may be considered successful if the five-year success criteria are achieved after five years or prior to the end of the monitoring period, pending county approval.

If the five-year success criteria are not met, then a contingency plan shall be implemented. Contingency plan recommendations can be found below.

## 4.4 90-Day Establishment Period

The monitoring and reporting protocols outlined below will be completed by a designated biologist/botanist in coordination with County staff:

- Following seeding, the developed area will be monitored every two weeks for the first 90 days.
- During the 90-day germination and establishment period, monitoring activities will include: (1) verifying that seeds have germinated, (2) verifying new recruits are surviving, (3) removing any non-native and invasive weeds that may have germinated.
- After the 90-day germination and establishment period, the designated biologist/botanist will draft a report summarizing the monitoring and maintenance activities that were implemented. Photos from designated photo points, relative percent cover of native plants, and any complications observed will be included in the report.

- Draft -

## 4.5 Biannual Monitoring

After completion of the 90-day establishment period monitoring and reporting, the designated biologist/botanist will complete the following monitoring and reporting protocols every six months (biannually):

- Recruited plants will be checked to ensure they are surviving. Non-native invasive species will be removed throughout the Project Area.
- Following each visit, the designated biologist will draft a short report documenting monitoring and maintenance activities that were implemented. Photos from designated photo points, relative percent cover of native plants, and any complications observed will be included in the report.

If success criteria are not met by the end of the five-year monitoring and maintenance period, the approved Contingency Plan outlined below will be implemented.

## 4.6 Contingency Plan

Establishing plants from seeds is known to be challenging in arid climates. If the success criteria outlined in Section 4.1 are not met by the end of the two-year monitoring and reporting period, the following Contingency Plan should be implemented.

Creosote plant individuals will be reared in one-gallon container pots. After they have grown for one year and are viable, the individual creosote plants will be transplanted into the soil in bare spaces throughout the Project Area. After planting, the base of each creosote plant will be surrounded by a thin layer of mulch to retain soil moisture. Additionally, each plant will be watered immediately after planting to ensure establishment. Timing of the plantings is crucial and should occur during the regional rainy season (likely

the month of December), ideally prior to a sizeable rain event. The number of creosote bush plants needed to revegetate the Project Area to achieve the required cover goals will be determined by the designated biologist botanist after the two-year monitoring period. Section 4.2, Monitoring and Maintenance outlines the protocols to effectively monitor and maintain the installed creosote bush plants in the Project Area.

## 4.7 Revegetation Expenses

During revegetation, the Project will incur costs associated with purchasing materials (i.e., seeds and mulch), labor for revegetation activities, the initial watering, and monitoring and maintenance of the Project Area. **Table 8** summarizes the estimated costs for activities and materials associated with revegetation of the Project Area.

*Table 8. Estimated Revegetation Costs**

| Activity | Unit | Number | Cost Info | Total |
|---|---|---|---|---|
| Purchasing seed mix at 50 pounds per acre | 50 Pound Sack/Acre | 2,380 (acres) | $707.13/acre | $1,682,969 |
| Broadcast and hydro-mulching/Hydroseed | 1 | 2,380 (acres) | $2,000/acre | $4,760,000 |
| Monitoring and maintenance | Lump Sum | 1 | $200,000/year 1<br>$65,000/year 2-5 | $460,000<br>(5 years) |
| Watering (optional as potential contingency measures) | 1 Week of Watering | 12 | $75,282/week | $903,384<br>(12 weeks) |
| Total revegetation cost (including watering contingency) | | | | $7,806,353 |

* All costs are estimates based on 2022 labor rates /materials pricing plus 7% inflation for 3 years till 2025.

- Draft -

# 5.0 Decommissioning Cost Estimate Summary

Expenses associated with decommissioning the Project will be dependent on labor costs at the time of decommissioning. For the purposes of this report, 2024 California Prevailing Wage Rates were used to estimate labor expenses. Fluctuation and inflation of the labor costs were not factored into the estimates.

## 5.1 Decommissioning Risk Over the Lifecycle of a Project

The probability of an event that would lead to abandonment or long-term interruption is extremely low during the first 15 to 20 years of the Project life. Accordingly, the risk of decommissioning the Project is extremely low during this time frame. The reasons why the risk to decommission the Project is extremely low in the early phases of the Project include, but are not limited to:

- Project owners have sophisticated financing structures that allow the lender or tax equity partner to step in and rectify the event that may lead to abandonment.
- Power Purchase Agreements (PPAs) are held between the Applicant and off-takers to purchase the generated power. Such PPAs play a key role in the financing of independently owned (i.e., not owned by a public utility) electricity generating assets since they define the revenue terms for a project and the credit quality.
- Most critical solar components have original equipment manufacturer (OEM) warranties with terms in excess of five years that include labor and parts. A warranty is an agreement or guarantee outlined by a manufacturer to a customer that defines performance requirements for a product or service. Warranties give customers a form of insurance if the purchased product or service does not adhere to quality standards. These warranties assure the Project owner, financing parties, and other stakeholders, that equipment will perform as expected, which minimizes the risk of a decommissioning event. Average warranty lengths for critical solar components range from 5 to 10 years, with production warranties on solar panels extending to 20 to 25 years.
- Solar projects consist of many networked components designed to convert solar radiation into electrical energy. The failure of any single component will not result in a substantial reduction of energy generation that could lead to a decommissioning event.
- Solar projects are required to maintain replacement value property damage insurance coverage and business interruption insurance coverage. Business interruption insurance covers the loss of income that a business suffers after a disaster or equipment failure. Typical solar business interruption insurance covers income loss for 12 months from the date of the event triggering the loss.
- The replacement costs of solar components will typically decline over time, and accordingly, costs to replace failed or damaged equipment after lapsed OEM warranties will not create large financial hurdles for the Project.
- In the early stages of the Project the resale value of the equipment is significantly higher than the decommissioning costs, resulting in a net positive (revenue).

- Draft -

## 5.2 Decommissioning Expenses

During decommissioning, the Project will incur costs associated with disposal of components not sold for salvage, including materials which will be disposed of at a licensed facility, as required. Decommissioning costs also include backfilling, grading, and restoration of the proposed Project Area as described in Section 3, Existing Land Use and Permit Closure Compliance. These costs are currently in development based on the current site design and will be provided in the final plan in **Table 9**.

*Table 9. Estimated Decommissioning Expenses*

| In Development | | | | |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

## 5.3 Decommissioning Revenues

Revenue from decommissioning the Project will be realized through the sale of the solar facility components and construction materials. As previously described, the value of the decommissioned components will be higher in the early stages of the Project and decline over time. Resale of components such as solar panels is expected to be greater than salvage (i.e., scrap) value for most of the life of the

Project, as described below. For purposes of this report, only estimated salvage values were considered in net revenue calculations, as this is the more conservative estimate strategy.

Modules and other solar plant components can be sold within a secondary market for reuse. A current sampling of reused solar panels indicates a wide range of pricing depending on age and condition ($0.10 to $0.30 per watt). Future pricing of solar panels is difficult to predict at this time, due to the relatively young age of the market, changes to solar panel technology, and the ever-increasing product demand. Increased costs of removal, for resale versus salvage, would be expected in order to preserve the integrity of the panels; however, the net revenue would be substantially higher than the estimated salvage value.

Secondary markets for used solar components include other utility scale solar facilities with similar designs that may require replacement equipment due to damage or normal wear over time; or other buyers (e.g., developers, consumers) that are willing to accept a slightly lower power output in return for a significantly lower price point when compared to new equipment.

The resale value of components such as trackers, may decline more quickly; however, the salvage value of the steel that makes up a large portion of the tracker is expected to stay at or above the value used in this report.

The market value of steel and other materials fluctuates daily and has varied widely over the past five years. Salvage value estimates were based on an approximate five-year-average price of steel and copper derived from sources including on-line recycling companies and United States Geological Survey commodity summaries. The price used to value the steel used in this report is $204 per metric ton (including transport); aluminum at $0.40 per pound; silicon at $0.40 per pound and glass at $0.05 per pound.

- Draft -

The main material of the tracking system and piles is assumed to be salvageable steel. The main components of the solar modules are glass and silicon with aluminum framing. A 50 percent recovery rate was assumed for all panel components, due to the processing required to separate the panel components. Alternative and more efficient methods of recycling solar panels are anticipated before this Project is decommissioned, given the large number of solar facilities that are currently being developed. **Table 10** summarizes the potential salvage value for the solar array components and construction materials.

*Table 10. Estimated Decommissioning Revenues (Salvage Value Only)*

| Item | Unit of Measure-ment | Quantity per Unit | Salvage Price per Unit | Total Salvage Price per Item | Number of Items | Total |
|---|---|---|---|---|---|---|
| Panels–Silicon | average pounds per panel | 1.9 | $0.40 | $0.760 | 879,077 | $668,099 |
| Panels–Aluminum | Average pounds per panel | 3.0 | $0.40 | $1.200 | 879,077 | $1,054,892 |

| Item | Unit of Measure-ment | Quantity per Unit | Salvage Price per Unit | Total Salvage Price per Item | Number of Items | Total |
|---|---|---|---|---|---|---|
| Panels–Glass | Average pounds per panel | 28.3 | $0.05 | $1.415 | 879,077 | $1,243,894 |
| Tracking System and Posts | Metric tons per $MW_{[AC]}$ | 1.35 | $241 | $325.35 | 13,572 | $4,415,650 |
| Substation | Each | 1 | $125,000 | $125,000 | 1 | $125,000 |
| Total Potential Revenue (solar components only) | | | | | $7,507,535 | |

* Revenue based on salvage value only.

Resources for the salvage of materials at end of life will change over the lifetime of the Project. During the first 10-15 years of Project operation, the components would be sold in a secondary market, rather than salvage; therefore, recycling would not be needed until much later in the Project life. At that point in time the availability and type of salvage operations will differ from today's selection. Recycling and salvage of solar components will be a growing market over the life of the Project due to the increase in solar energy plants installed and therefore increased business opportunities. Another factor in the salvage revenue analysis is that the availability of natural resources is anticipated to diminish over time, leading to an increase in revenue for the component's base materials. These market changes will lead to additional options for salvage of Project components.

– Draft –

A list of current regional salvage and recycling businesses is offered below, although, as discussed, this list is expected to change and grow by the time the Project is decommissioned.

- SA Recycling; Las Vegas locations (approximately 50 miles from Project Area)
- Pahrump Valley Recycling; Pahrump, NV (approximately 30 miles from Project Area)
- TriCounty Scrap Metals; Pahrump, NV (approximately 30 miles from Project Area)

## 5.4 Decommissioning Cost Summary and Financial Assurance

The Applicant will be responsible for decommissioning the Project facilities. These costs are currently in development based on the current site design and will be provided in the final plan in **Table 11**.

*Table 11. Net Decommissioning Summary*

| Item | Cost/Revenue |
|---|---|
| To be determined | |
| | |
| | |

| Item | Cost/Revenue |
|---|---|
| | |

The Applicant has indicated that a financial guarantee to cover the approved decommissioning cost including a 20 percent contingency will be provided in a form that is acceptable to the County commissioners, County counsel and the Land Use Services Director.

As detailed in the County code, the decommissioning plan and financial assurance will be reviewed by the County and the Applicant annually or as deemed necessary and adjusted to ensure sufficient resources are available to decommission the Project throughout its life.

- Draft -

# 6.0 References

California Department of Water Resources (DWR). 2026. Part III. Destruction of Water Wells. Available at: https://water.ca.gov/Programs/Groundwater-Management/Wells/Well-Standards/Combined-Well-Standards/Water-Destruction.

California Native Plant Society (CNPS). 2026. A Manual of California Vegetation Online. Available at: https://vegetation.cnps.org/.

Hidden Hills Solar, LLC. 2011. Application for Certification for Hidden Hills Solar Electric Generating System. Available at: https://web.archive.org/web/20150910004220/http://www.energy.ca.gov/sitingcases/hiddenhills/documents/applicant/afc/.

Inyo County. 2026. Personal comms with well inspector at Inyo County Environmental Health Department.

Inyo County. 2025. Code of Ordinances: Title 21 Renewable Energy Development. Updated September 23, 2025. Available at: https://ecode360.com/44467123#44467123.

____. 2002. Inyo County General Plan: Land Use and Conservation/Open Space Elements. Diagram 29. Charleston View. Available at: https://www.inyocounty.us/sites/default/files/2020-02/Landuse%20Diagrams.pdf

____. 2015. Inyo County Renewable Energy General Plan Amendment: Final Errata to the Final Program Environmental Report. March 24, 2015. Available at: https://www.inyocounty.us/sites/default/files/2020-04/FinalREGPA33015.pdf

Jepson eFlora. 2025. Available at: http://ucjeps.berkeley.edu/eflora/.

Stantec Consulting Services Inc. (Stantec). 2025. Bonanza Peak Solar Project: Botanical Resources Survey Report. September 18, 2025.

- Draft -

# Appendix A. Seed quote

- Draft -