CEQA Guidelines Section 15183 Consistency Analysis

Bonanza Peak Energy Project

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County of Inyo Bonanza Peak Energy Project

CEQA Guidelines Section 15183 Consistency Analysis

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
AF	Acre-Foot
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
gen-tie	Generation tie-in
GHG	Greenhouse Gas
ITP	Incidental Take Permit
MMRP	Mitigation Monitoring and Reporting Program
MW	Megawatt
O&M	Operations and Maintenance
PEIR	Program Environmental Impact Report
POD	Plan of Development
PRC	Public Resources Code
Project	Bonanza Peak Energy Project
PV	Photovoltaic
REGPA	Renewable Energy General Plan Amendment
SEDA	Solar Energy Development Area
USFWS	United States Fish and Wildlife Service
WR	Water Resources Policy

EXECUTIVE SUMMARY

PURPOSE OF THIS ANALYSIS

This Consistency Analysis has been prepared pursuant to Section 15183 of the California Environmental Quality Act (CEQA) Guidelines for the Bonanza Peak Energy Project (Project).

The Bonanza Peak Energy Project (Project) is located within the Charleston View Solar Energy Development Area (SEDA), which was specifically evaluated as part of the certified Inyo County Renewable Energy General Plan Amendment (REGPA) Program Environmental Impact Report (PEIR). This analysis evaluates whether the Project would result in project-specific significant effects that are peculiar to the Project or Project Area,[1] new significant environmental effects not previously analyzed, cumulatively considerable impacts not previously considered, or impacts substantially more severe than those evaluated in the REGPA PEIR.

PROJECT OVERVIEW

The Project consists of construction, operation, maintenance, and eventual decommissioning of a utility-scale photovoltaic (PV) solar energy facility and associated infrastructure within the Charleston View SEDA in southeastern Inyo County, California.

Project facilities include PV arrays, collection systems, substations, access roads, sediment (stormwater) basins and management facilities, operations and maintenance (O&M) facilities, a new well, and associated electrical infrastructure.

CONSISTENCY WITH THE REGPA PEIR

The Project is located entirely within the Charleston View SEDA and remains consistent with the development framework established and analyzed by the REGPA PEIR.

The Project does not exceed the development assumptions evaluated for the Charleston View SEDA and remains subject to the mitigation measures adopted through the REGPA PEIR Mitigation Monitoring and Reporting Program (MMRP).[2] The Project is consistent with the renewable energy planning framework established by the County and with the development assumptions analyzed by the REGPA PEIR.

[1] The Project Area is an approximately 3,382-acre area that includes all Project components, except the off-site access road, as well as an approximately 982-acre area along the state border that will not be developed.

[2] Minor refinements to the mitigation measures being considered for this Project are addressed in the Bonanza Peak Energy Mitigation Measure Refinements memorandum. These do not change the significance determinations for the Project. References throughout this document to mitigation measures of the REGPA PEIR include those proposed changes.

KEY FINDINGS

BIOLOGICAL RESOURCES

Project-specific biological resource studies, agency consultation, and implementation of applicable REGPA PEIR mitigation measures demonstrate that biological resource impacts remain within the scope of impacts analyzed by the REGPA PEIR.

A small portion of the Developable Area[3] is within a desert tortoise priority connectivity area. Priority habitat connectivity areas were developed in 2009[4] using mapping technology that allowed only coarse, landscape-scale delineation of habitat areas. However, those designations are not reflected in the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife's current, project-specific approach to desert tortoise conservation. Now, the agencies assess project-specific impacts to desert tortoise through current habitat information, project-specific surveys, and applicable avoidance, minimization, and mitigation requirements established through consultation and permitting. The Project is undergoing Section 10 Endangered Species Act consultation with the USFWS under the Desert Tortoise General Conservation Plan (GCP),[5] through which Project-specific impacts and appropriate avoidance, minimization, and mitigation requirements are being addressed. Neither the GCP nor the GCP Final Environmental Impact Statement[6] reference or rely on priority connectivity areas.

The Project's biological mitigation strategy includes preservation and long-term management of the Kingston View and Campito Peak mitigation sites totaling approximately 2,400 acres of high quality habitat preserved in perpetuity. Based on recent surveys at Kingston View, this site has a greater habitat value than the Project Area and, along with a portion of the contiguous Campito Peak property, will provide sufficient habitat value to satisfy the Project's biological mitigation objectives and support applicable permitting requirements.

HYDROLOGY AND WATER RESOURCES

Project-specific groundwater, hydrology, and water supply analyses concluded that sufficient groundwater resources exist to support Project construction, operation, and decommissioning activities. Groundwater management commitments and applicable mitigation requirements support the conclusion that Project impacts remain within the impact framework evaluated by the REGPA PEIR.

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[3] Within the Project Area is an approximately 2,400-acre Developable Area that includes the PV facilities, substation, Operations and Maintenance building, interior access roads, a well, and the gen-tie. The Developable Area does not include the sediment (stormwater) basins or the perimeter fence.
[4] Nussear, K.E., Esque, T.C., Inman, R.D., Gass, L., Thomas, K.A., Wallace, C.S.A., Blainey, J.B., Miller, D.M., and Webb, R.H., 2009. *Modeling habitat of the desert tortoise (*Gopherus agassizii*) in the Mojave and parts of the Sonoran Deserts of California, Nevada, Utah, and Arizona*: U.S. Geological Survey Open-File Report 2009-1102, 18 p.
[5] U.S. Fish and Wildlife Service. 2025. *General Conservation Plan for the Desert Tortoise in California*. Palm Springs Fish and Wildlife Office. December 2025.
[6] U.S. Fish and Wildlife Service. 2025. *General Conservation Plan for the Desert Tortoise in California Final Environmental Impact Statement*. Carlsbad Fish and Wildlife Office. June 2025.

The Project remains subject to applicable groundwater management requirements, including retirement of groundwater use associated with the mitigation sites and compliance with County groundwater policies.

CULTURAL RESOURCES

Project-specific cultural resource investigations and implementation of applicable mitigation measures confirm that impacts to archaeological resources, tribal cultural resources, historic resources, and paleontological resources remain within the impact framework previously evaluated by the REGPA PEIR. The Project remains subject to applicable cultural resource monitoring, treatment, reporting, and inadvertent discovery requirements.

CUMULATIVE IMPACTS

The REGPA PEIR evaluated cumulative impacts associated with buildout of SEDAs throughout Inyo County, as well as numerous renewable energy projects and other projects in neighboring counties (including Nye County in Nevada). The Project is located entirely within the Charleston View SEDA and represents renewable energy development specifically anticipated by the REGPA PEIR.

County staff concluded that the Project effectively utilizes the development allocation established for the Charleston View SEDA and Eastern Solar Energy Group. Accordingly, Project approval does not expand the renewable energy development capacity assumed by the REGPA PEIR cumulative impact analysis and instead represents implementation of the renewable energy development framework previously evaluated by the County.

KEY BASIS FOR SECTION 15183 DETERMINATION

The Project is located entirely within the Charleston View SEDA, an area specifically identified and evaluated for utility-scale solar development in the certified Inyo County REGPA PEIR. The Project remains within the development assumptions analyzed by the REGPA PEIR and is subject to the mitigation measures adopted through the REGPA PEIR MMRP.

The analysis supporting a determination under CEQA Guidelines Section 15183 includes Project-specific environmental review, including biological resource investigations, groundwater and water supply analyses, hydrology evaluations, cultural resource studies, visual resource assessments, transportation analyses, and agency consultation. These studies provide substantial evidence supporting the County's determination that the Project qualifies for streamlining pursuant to CEQA Guidelines Section 15183.

The analyses summarized in this document support the County's determination that the Project would not result in project-specific effects peculiar to the Project or site, significant effects not previously analyzed, cumulatively considerable impacts not previously evaluated, or impacts substantially more severe than those analyzed in the REGPA PEIR.

The Project's environmental protection strategy includes implementation of applicable REGPA PEIR mitigation measures, Project-specific conditions of approval, groundwater management commitments, and conservation of the Kingston View and Campito Peak mitigation sites (approximately 2,400 acres combined). Together, these measures ensure that Project impacts remain within the environmental impact framework evaluated by the REGPA PEIR.

Collectively, these studies, mitigation requirements, permit obligations, and review processes provide substantial evidence supporting the County's determination that the Project qualifies for streamlining pursuant to CEQA Guidelines Section 15183.

SECTION 15183 DETERMINATION

Based on the evidence contained in the administrative record, including the REGPA PEIR, Project Addendum, supporting technical studies, agency coordination, and applicable mitigation measures:

- The Project is consistent with the development assumptions evaluated by the REGPA PEIR.
- No project-specific significant effects peculiar to the Project or Project Area have been identified.
- No new significant environmental effects have been identified.
- No previously identified impacts would occur at a substantially more severe level than previously analyzed.
- No new cumulatively considerable impacts have been identified.

Accordingly, the Project satisfies the requirements of CEQA Guidelines Section 15183. Based on the analysis contained herein and the evidence contained in the administrative record, no additional CEQA review beyond the previously certified REGPA PEIR and associated Project-level environmental review is required.

1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires public agencies to consider and analyze the potential environmental effects of activities that (a) involve the exercise of discretionary powers, (b) have potential to impact the environment, (c) meet the definition of a "project", and (d) are not categorically or statutorily exempt from CEQA. California Code of Regulations Title 14, Division 6, Chapter 3 (also known as CEQA Guidelines) Section 15183 provides a specific CEQA review process for qualifying projects that are consistent with a community plan or zoning. Under these regulations (reflected in California Public Resources Code [PRC] section 21083.3 and CEQA Guidelines Section 15183), projects that are consistent with the development density of existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified shall be exempt from additional CEQA analysis except as may be necessary to determine whether there are project-specific significant effects that are peculiar to the Project or site that would otherwise require additional CEQA review.

The Bonanza Peak Energy Project (Project) is located within the Charleston View Solar Energy Development Area (SEDA), an area specifically evaluated in the 2015 Inyo County Renewable Energy General Plan Amendment (REGPA) Program Environmental Impact Report (PEIR), which was certified in March 2015. The REGPA PEIR evaluated the environmental effects of utility-scale renewable energy development within designated SEDAs throughout Inyo County and adopted applicable mitigation measures through the REGPA PEIR Mitigation Monitoring and Reporting Program (MMRP). The Project is located entirely within the Charleston View SEDA and represents the type of utility-scale solar development specifically contemplated by the REGPA PEIR.

Bonanza Peak Solar, LLC, a subsidiary of Hanwha Renewables (Applicant), has prepared this Section 15183 Consistency Analysis, including an environmental checklist, to evaluate the Project's consistency with the General Plan, including the March 2015 REGPA PEIR. As mandated by the CEQA Guidelines Section 15183, this checklist identifies whether environmental effects of the Project meet any of the following criteria:

1. Effects are peculiar to the project or the parcel on which the project would be located.
2. Effects were not analyzed as significant effects in a prior EIR on the land use, general plan or community plan with which the project is consistent.
3. Potentially significant off-site or cumulative impacts would occur that were not discussed in the prior EIR prepared for the applicable General Plan, community plan, or zoning action.
4. Effects are previously identified significant effects that, because of substantial new information that was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

If an impact is not peculiar to the parcel or to the Project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards as contemplated by CEQA Guidelines Section 15183(e), then an additional EIR need not be prepared for the Project solely on the basis of that impact.

Pursuant to CEQA Guidelines Section 15183, subsequent environmental impact analysis would be required if any impacts meet the above criteria. The Project is located entirely within the

Charleston View SEDA and represents the type of utility-scale solar development specifically contemplated by the REGPA PEIR.

2 PRIOR ENVIRONMENTAL REVIEW

2.1 REGPA PEIR

The REGPA PEIR evaluated the environmental effects associated with implementation of renewable energy policies and utility-scale renewable energy development throughout designated SEDAs within Inyo County.

The REGPA PEIR analyzed impacts associated with:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- 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
- Utilities and Service Systems
- Mandatory Findings of Significance

The PEIR also adopted mitigation measures designed to avoid, minimize, and compensate for significant environmental impacts associated with implementation of renewable energy development within the SEDAs.[7]

[7] Minor refinements to the mitigation measures being considered for this Project are addressed in the Bonanza Peak Energy Mitigation Measure Refinements memorandum. These do not change the significance determinations for the Project. References throughout this document to mitigation measures of the REGPA PEIR include those proposed changes.

2.2 BONANZA PEAK ADDENDUM

Following completion of Project-specific technical studies, agency coordination, and environmental review, Inyo County prepared an Addendum to the REGPA PEIR for the Project pursuant to CEQA Guidelines Section 15164 after determining that none of the circumstances identified in CEQA Guidelines Section 15162 requiring preparation of a subsequent or supplemental EIR were present. The purpose of the Addendum was to evaluate the Project's site-specific characteristics and determine whether implementation of the Project would result in environmental effects beyond those previously analyzed in the REGPA PEIR.

The Addendum was informed by numerous Project-specific technical studies, including analyses of biological resources, cultural and tribal cultural resources, visual resources, paleontological resources, hydrology, water supply, air quality and GHG emissions, and traffic. These studies incorporated field investigations, agency consultation, and site-specific design details to evaluate the Project's environmental effects within the framework established by the REGPA PEIR and are attached as appendices to the Addendum.

Pursuant to CEQA Guidelines Sections 15162 and 15164, the County evaluated whether the Project would result in substantial changes to the circumstances under which the REGPA PEIR was certified, involve substantial project changes requiring major revisions to the prior environmental analysis, or present new information demonstrating the potential for new or substantially more severe significant environmental impacts. Based on this evaluation, the analysis concludes that the Project would not result in new significant environmental effects, would not substantially increase the severity of impacts previously identified in the REGPA PEIR, and would remain within the scope of renewable energy development contemplated by the REGPA planning framework.

Because none of the conditions requiring preparation of a Subsequent EIR or Supplemental EIR pursuant to CEQA Guidelines Sections 15162 or 15164 were present, the analysis concludes that preparation of an Addendum pursuant to CEQA Guidelines was the appropriate CEQA pathway. The Addendum documents the County's conclusions regarding Project-specific environmental effects and incorporated the findings of the supporting technical studies into the administrative record for the Project.

The Addendum provides an important foundation for this Section 15183 Consistency Analysis. Together, the REGPA PEIR, Project Addendum, supporting technical studies, and associated consultation records (including the Bonanza Peak Energy Mitigation Measure Refinements memorandum) demonstrate that the Project remains consistent with the development assumptions evaluated in the REGPA PEIR and does not result in new significant impacts, substantially more severe impacts, or impacts peculiar to the Project or site. Accordingly, the environmental record supports the County's use of CEQA Guidelines Section 15183 for the proposed Project, in addition to the use of CEQA Guidelines Sections 15162 and 15164.

3 PROJECT INFORMATION

3.1 PROJECT INFORMATION SUMMARY

Project Feature	Definition
Project Name	Bonanza Peak Energy Project
Lead Agency	County of Inyo
Location	Charleston View SEDA
General Plan Designation	Open Space and Recreation (OSR)
Zoning Designation	Open Space – 40 acres minimum (OS-40)
Project Type	Utility-Scale Photovoltaic (PV) Solar Energy Facility
Generating Capacity	Up to 500 megawatts (MW) alternating current
Project Area	Approximately 3,382 acres
Developable Area	Up to 2,400 acres
Associated Facilities	Substation, Collector Lines, Access Roads, Operations and Maintenance (O&M) Building, Existing and/or New Water Well(s), Drainage and Stormwater Facilities, Generation Tie-Line Infrastructure
Prior Environmental Review	REGPA PEIR and Bonanza Peak Addendum
Applicable CEQA Review	CEQA Guidelines Section 15183 Consistency Analysis
Conservation Lands	Kingston View and Campito Peak Mitigation Sites (approximately 2,400 acres combined)
Applicable Mitigation Program	Bonanza Peak Energy Project MMRP

3.2 PROJECT OVERVIEW

The Project is a utility-scale renewable energy facility proposed within the Charleston View SEDA in Inyo County, California. The Project would include photovoltaic (PV) solar generation facilities, collector and electrical systems, a Project substation, existing and/or new water wells, generation interconnection facilities, access improvements, and associated ancillary infrastructure necessary for construction, operation, and maintenance of the facility.

The Project has been designed to support regional renewable energy generation goals while utilizing lands previously identified and analyzed for renewable energy development under the REGPA PEIR. The Project Area is an approximately 3,382-acre area that includes all Project components, except the off-site access road, as well as an approximately 982-acre area along the state border that will not be developed. Within the Project Area is an approximately 2,400-acre Developable Area that includes the PV facilities, substation, Operations and Maintenance (O&M) building, roads, a well, and the generation tie-in (gen-tie) line. The Developable Area does not include the sediment (stormwater) basins or the perimeter fence. The Project Area is located within an area designated for utility-scale renewable energy development (a SEDA) and has been

evaluated through prior environmental review, technical studies, and an Addendum to the REGPA PEIR.

3.2.1 PROJECT LOCATION AND SETTING

The Project Area is located in southeastern Inyo County, California, within the Charleston View SEDA. The site is located north of Old Spanish Trail Highway / Tecopa Road and adjacent to the California-Nevada state line. The Project Area is approximately 1 mile north of the community of Charleston View, approximately 25 miles south of Pahrump, Nevada, and approximately 57 miles west of Las Vegas, Nevada. Surrounding land uses consist primarily of undeveloped open space, with limited residential and commercial development occurring south of the Project Area in Charleston View. The site is subject to the renewable energy development framework established through the REGPA PEIR and the County's renewable energy development regulations.

The Project has been evaluated for consistency with applicable General Plan policies, zoning regulations, and renewable energy development standards. The Project is consistent with the development assumptions evaluated for the Charleston View SEDA and applicable county land use policies.

3.2.2 PROJECT COMPONENTS

The Project consists of construction, operation, maintenance, and eventual decommissioning of a utility-scale PV solar energy generation facility and associated infrastructure. The Project has a planned net generating capacity of up to 500 megawatts (MW) alternating current and would be located within a 3,382-acre Project Area with a Developable Area of no greater than 2,400 acres, consistent with the development limitations established for the Charleston View SEDA.

Major Project components include:

- PV modules and solar arrays
- Power conversion systems, including inverters and medium-voltage transformers
- Medium-voltage underground electrical collection system
- Electrical substation
- Gen-tie facilities
- O&M facilities
- Supervisory Control and Data Acquisition system and fiber optic communications network
- Meteorological stations
- Water supply facilities
- Site security and perimeter fencing
- Access roads and connector roads
- Temporary construction facilities
- Associated electrical and telecommunications infrastructure
- Sediment (stormwater) basins

The Project includes water supply facilities, including groundwater well infrastructure necessary to support construction and operation of the Project. Construction is anticipated to occur over approximately 18 months, followed by an operational life of approximately 48.5 years and a decommissioning period of approximately one year.

The Project also includes a 230-kilovolt gen-tie extending from the Project substation to the Trout Canyon substation in Nevada. Approximately 0.4 mile of the gen-tie would be located within Inyo County and the remaining approximately 8.5 miles would be located in Nevada.

3.2.3 CONSTRUCTION ACTIVITIES

Project construction would occur over a phased construction period and would include site preparation, grading, installation of foundations and support structures, electrical infrastructure installation, project substation construction, and final equipment installation and testing.

Construction activities would involve the use of heavy equipment, temporary staging areas, workforce parking areas, and material laydown yards. Construction-related disturbances would be temporary in nature and would be conducted in accordance with approved plans, permit conditions, and applicable mitigation measures incorporated through the REGPA PEIR, Project Addendum, and County approvals.

3.2.4 PROJECT OPERATIONS AND MAINTENANCE

Following construction, the Project would operate as a long-term renewable energy generation facility. Routine operations would include performance monitoring, equipment maintenance, vegetation management, inspection of electrical systems, and periodic replacement or repair of project components as necessary.

Operational staffing would be limited and would primarily consist of maintenance and inspection personnel accessing the site periodically through existing and improved access roads.

4 CONSISTENCY WITH REGPA PEIR DEVELOPMENT ASSUMPTIONS

4.1 CHARLESTON VIEW SEDA

The Charleston View SEDA was evaluated in the REGPA PEIR as an option for utility-scale solar development within the County. The PEIR established development parameters including a maximum Developable Area of 2,400 acres and a maximum generation capacity of 500 MW.

The Project is located entirely within the Charleston View SEDA and remains within the development assumptions evaluated by the REGPA PEIR.

4.2 DEVELOPMENT INTENSITY

The Project utilizes the maximum development allocation of 2,400 acres and maximum generation capacity of 500 MW established for the Charleston View SEDA. As discussed in the Staff Report, the Project would effectively utilize the development allocation established for the Charleston View SEDA and corresponding renewable energy development capacity available within the Eastern

Solar Energy Group. Accordingly, the Project does not exceed the renewable energy development intensity previously evaluated by the REGPA PEIR.

4.3 SECTION 15183 CONSISTENCY DETERMINATION

Because the Project is located within the Charleston View SEDA, does not exceed development assumptions evaluated by the REGPA PEIR, implements applicable REGPA PEIR mitigation measures, and represents the type of development specifically evaluated by the REGPA PEIR, the Project qualifies for consideration under CEQA Guidelines Section 15183.

4.4 SECTION 15183 FINDINGS FRAMEWORK

CEQA Guidelines Section 15183 provides that projects consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was previously certified shall not require additional environmental review except as necessary to examine: (1) project-specific effects that are peculiar to the project or its site; (2) effects that were not analyzed as significant effects in the prior EIR; (3) potentially significant offsite or cumulative impacts not discussed in the prior EIR; or (4) previously identified significant effects that would be substantially more severe than discussed in the prior EIR. This Consistency Analysis has been prepared to evaluate the Project against each of these statutory considerations.

4.4.1 PECULIAR EFFECTS

The Project is located entirely within the Charleston View SEDA, an area specifically identified and evaluated by the Inyo County REGPA PEIR for utility-scale solar energy development. The Project consists of PV solar generation facilities and associated infrastructure of the type contemplated by the REGPA PEIR and County renewable energy planning framework. The Project is consistent with the development assumptions, acreage limitations, and renewable energy policies applicable to the Charleston View SEDA.

Project-specific technical studies included analyses of biological resources, cultural and tribal cultural resources, visual resources, paleontological resources, hydrology, water supply, air quality and GHG emissions, and traffic. These studies identified less than significant environmental impacts associated with utility-scale solar development but did not identify environmental effects that are unique to the site or fundamentally different from the types of impacts anticipated by the REGPA PEIR. Rather, the identified impacts are consistent with those anticipated for renewable energy development within the Charleston View SEDA and are addressed through implementation of applicable PEIR mitigation measures, project-specific mitigation requirements, permit obligations, and conditions of approval.

Accordingly, the Project would not result in Project-specific significant effects that are peculiar to the Project or Project Area and remains consistent with the impact framework evaluated in the REGPA PEIR.

4.4.2 EFFECTS NOT PREVIOUSLY ANALYZED

The REGPA PEIR evaluated environmental impacts associated with utility-scale renewable energy development throughout designated renewable energy development areas within the County,

including effects to biological resources, groundwater resources, visual resources, cultural resources, traffic, public services, and other environmental resources. Applicable mitigation measures were adopted through the REGPA PEIR MMRP.

Subsequent Project-level environmental review was conducted through preparation of the Addendum and supporting technical studies. While these studies provide substantially more detailed information regarding the Project and site-specific conditions than was available at the program level, they do not identify a new category of significant environmental impact beyond those previously analyzed by the REGPA PEIR. Instead, the studies confirm implementation of mitigation measures and environmental protection strategies anticipated by the PEIR and provide substantial evidence regarding Project-specific conditions.

Therefore, the Project would not result in significant environmental effects that were not previously analyzed in the REGPA PEIR.

4.4.3 CUMULATIVE EFFECTS

The REGPA PEIR evaluated cumulative impacts associated with implementation of the County's renewable energy planning framework and considered renewable energy development and other reasonably foreseeable development within the cumulative study area identified in the PEIR.

The Project is located entirely within the Charleston View SEDA and represents the type and scale of renewable energy development specifically contemplated by the REGPA PEIR. The Project utilizes the development allocation established for the Charleston View SEDA and the renewable energy development capacity identified for the Eastern Solar Energy Group.

As documented in the Project Plan of Development (POD), there are currently no other renewable energy projects developed or proposed within the Charleston View SEDA or Eastern Solar Energy Group. Accordingly, the Project remains within the renewable energy development assumptions evaluated by the REGPA PEIR and does not expand the renewable energy development framework evaluated for the Charleston View SEDA and Eastern Solar Energy Group.

Additional discussion regarding cumulative impacts is provided in Section 6.2, Mandatory Findings of Significance. Based on that analysis, the Project would not result in a new cumulatively considerable impact or a cumulative impact substantially more severe than analyzed in the REGPA PEIR.

4.4.4 MORE SEVERE EFFECTS

The Project has undergone subsequent site-specific environmental review, including supporting technical studies and a Project Addendum, to determine whether impacts identified in the REGPA PEIR would occur at a substantially greater level of severity than previously analyzed.

Project-specific review confirms that the Project remains subject to applicable REGPA PEIR mitigation measures and incorporates additional project-specific environmental commitments developed through subsequent environmental review, agency consultation, permit requirements, and conditions of approval. These include species-specific biological mitigation requirements, groundwater management commitments, habitat conservation measures, cultural resource

protection measures, and other environmental commitments tailored to Project-specific conditions.

Implementation of applicable mitigation measures and Project mitigation measures reduces impacts to levels anticipated by the REGPA PEIR and no previously identified significant environmental effect would occur at a substantially greater severity than previously analyzed.

4.4.5 SECTION 15183 CONCLUSION

Based on the foregoing:

1. The Project is consistent with the development assumptions evaluated by the REGPA PEIR.
2. No project-specific significant effects peculiar to the Project or Project Area have been identified.
3. No significant environmental effects have been identified that were not previously analyzed by the REGPA PEIR.
4. No new cumulatively considerable impacts have been identified.
5. No previously identified significant environmental effects would occur at a substantially more severe level than analyzed by the REGPA PEIR.

The resource-specific analyses presented in the following sections provide the substantial evidence supporting these findings and demonstrate the Project's eligibility for consideration under CEQA Guidelines Section 15183.

5 ENVIRONMENTAL ANALYSIS

The following analysis evaluates whether the Project would result in impacts that are peculiar to the Project or site, were not analyzed as significant effects in the REGPA PEIR, constitute potentially significant off-site impacts not previously discussed, or would be substantially more severe than those previously analyzed. This evaluation has been prepared in accordance with CEQA Guidelines Section 15183 and is based on the environmental record for the Project, including the REGPA PEIR, Project Addendum, technical studies, agency consultation, tribal consultation, and other supporting documentation.

As discussed in Sections 2.0 through 4.0 of this Consistency Analysis, the Project is located within the Charleston View SEDA and remains generally consistent with the development assumptions, environmental setting, and mitigation framework evaluated in the REGPA PEIR. The environmental resource topics evaluated below correspond to the issue areas analyzed in the REGPA PEIR and further assessed through Project-specific environmental review. For each resource topic, this analysis considers the Project's site-specific characteristics, applicable technical studies, agency and tribal consultation, and the findings of the Project Addendum to determine whether the Project would result in impacts that are peculiar to the Project or site, constitute new significant environmental effects, create potentially significant off-site impacts not previously analyzed, or substantially increase the severity of impacts previously evaluated in the REGPA PEIR.

As detailed below, the Project impacts remain within the scope of impacts evaluated in the REGPA PEIR, and applicable mitigation measures adopted through the REGPA PEIR continue to apply to the Project.

5.1 AESTHETICS

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?		X		
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?		X		
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?		X		
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		X		

5.1.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA.

Visual impacts associated with renewable energy development within the Charleston View SEDA were previously evaluated in the REGPA PEIR. The following analysis evaluates whether Project-specific visual impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.1.2 DISCUSSION

The Inyo County REGPA PEIR evaluated visual character, scenic resources, glare, viewsheds, nighttime lighting, transmission facilities, and visual impacts associated with utility-scale solar development. Applicable mitigation measures include AES-1, AES-2, AES-4, AES-5, AES-6, AES-9, and AES-10.

Project-specific visual simulations and glare analyses were prepared for the Project. These studies evaluated visibility from public roadways, scenic viewpoints, and other sensitive visual receptors.

Applicable visual design measures, lighting controls, anti-reflective coatings, glare reduction measures, and construction-phase visual controls have been incorporated into Project design and remain subject to applicable REGPA PEIR mitigation measures.

Based on the site-specific visual analyses completed for the Project and implementation of applicable mitigation measures, Project-related visual impacts remain within the impact framework evaluated by the REGPA PEIR and do not constitute substantial new information or a substantially more severe impact than previously analyzed.

5.1.3 AESTHETICS CONCLUSION

The Project-related visual, scenic, glare, and lighting impacts were anticipated and analyzed by the REGPA PEIR. The Project remains subject to applicable REGPA PEIR mitigation measures and would not result in a project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated.

5.2 AGRICULTURE AND FORESTRY RESOURCES

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use?				X
b) Conflict with existing agricultural zoning or a Williamson Act contract?		X		
c) Conflict with existing zoning for, or cause rezoning of, forest land or timberland?				X
d) Result in the loss of forest land or conversion of forest land to a non-forest use?				X
e) Involve other changes that could result in conversion of farmland, forest land, or timberland to non-agricultural uses?		X		

5.2.1 DISCUSSION

The Inyo County REGPA PEIR evaluated impacts to agricultural and forestry resources associated with renewable energy development. The Project is located within the Charleston View SEDA, an

area specifically identified and evaluated for utility-scale renewable energy development through the REGPA PEIR.

The Project Area does not contain Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest land, or timberland. The Project would not result in conversion of forest land or timberland and would not conflict with forestry resource policies or programs.

The Project has also been reviewed for consistency with applicable land use regulations and resource protection requirements. Based on Project-specific review and the analyses contained in the Addendum, agriculture and forestry resource impacts remain within the impact framework evaluated by the REGPA PEIR and do not represent substantial new information or a substantially more severe impact than previously analyzed.

5.2.2 AGRICULTURE AND FORESTRY RESOURCES CONCLUSION

The Project would not result in a Project-specific significant effect, substantial new information, or a substantially more severe impact to agricultural or forestry resources than previously evaluated in the REGPA PEIR.

5.3 AIR QUALITY

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?		X		
b) 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?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?		X		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				X

5.3.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA.

Construction activities would result in temporary emissions associated with grading, vehicle travel, equipment operation, and workforce commuting. Air quality impacts associated with renewable energy development within the Charleston View SEDA were previously evaluated in the REGPA PEIR. The following analysis evaluates whether Project-specific air quality impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.3.2 DISCUSSION

The REGPA PEIR evaluated criteria pollutant emissions, fugitive dust, construction emissions, operational emissions, and regional air quality impacts associated with utility-scale solar development. Applicable mitigation measures include AQ-1, AQ-2, and AQ-3. A minor refinement to AQ-2 is requested, as further defined in ERM's Mitigation Measure Justification Memo prepared for the Project. This refinement specifies the use of water as an alternative soil stabilizer and is requested so that AQ-2 is consistent with a similar refinement requested for BIO-3b (see Section 5.4.4). This refinement will not impact the analysis undertaken by the REGPA PEIR.

A Project-specific Air Quality and GHG Emissions Report was prepared to evaluate potential air quality impacts associated with Project construction and operation. The Project incorporates applicable dust-control requirements, fugitive dust controls, roadway stabilization measures, construction best management practices, and operational dust-control measures consistent with the mitigation framework established by the REGPA PEIR.

The Project does not introduce a new source type or emission profile beyond those contemplated by the REGPA PEIR. Based on the Project-specific air quality analysis and implementation of applicable mitigation measures, air quality impacts remain within the impact framework evaluated by the REGPA PEIR and do not represent substantial new information or a substantially more severe impact than previously analyzed.

5.3.3 AIR QUALITY CONCLUSION

Therefore, the Project-related air quality impacts were anticipated and analyzed by the REGPA PEIR. The Project remains subject to applicable REGPA PEIR mitigation measures and would not result in a Project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated.

5.4 BIOLOGICAL RESOURCES

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species?		X		

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community?		X		
c) Have a substantial adverse effect on federally protected wetlands or waters?		X		
d) Interfere substantially with the movement of native resident or migratory wildlife species or with established wildlife corridors?		X		
e) Conflict with local policies or ordinances protecting biological resources?		X		
f) Conflict with provisions of an adopted Habitat Conservation Plan or other conservation plan?				X

5.4.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA. Biological resources within the Project Area have been evaluated through Project-specific surveys, agency consultation, and technical studies. The following analysis evaluates whether Project-related biological resource impacts would be peculiar to the Project or substantially more severe than those previously analyzed in the REGPA PEIR.

5.4.2 DISCUSSION

The Inyo County REGPA PEIR evaluated impacts associated with utility-scale solar development within designated SEDAs, including impacts to special-status plants, special-status wildlife, desert tortoise, burrowing owl, migratory birds, habitat connectivity, and sensitive natural communities. The REGPA PEIR adopted Mitigation Measures BIO-1 through BIO-25 to address such impacts. The Project is located within the Charleston View SEDA and is therefore subject to the biological resource impact assumptions and mitigation framework established by the REGPA PEIR.

Project-specific biological surveys were completed for the Project and included desert tortoise surveys, special-status plant surveys, burrowing owl surveys, a LeConte’s thrasher habitat assessment, and aquatic resources delineations. These surveys identified sensitive biological resources in the Project Area.

5.4.3 SPECIAL-STATUS PLANTS

The Biological Resources Technical Report documented multiple special-status plant species within the Project Area, including California Native Plant Society-listed species and species protected under the California Desert Native Plants Act. Project-specific botanical surveys were completed consistent with the requirements of Mitigation Measure BIO-2.

The Project incorporates avoidance, minimization, mitigation, and monitoring measures consistent with BIO-2. In addition, correspondence from the California Department of Fish and Wildlife (CDFW) states that because of the overlap of species and habitat types represented on the proposed conservation lands, the CDFW does not recommend additional species-specific mitigation lands and considers the proposed mitigation property sufficient to satisfy the intent of applicable PEIR mitigation measures and agency requirements.

The Project impacts to special-status plants are addressed through implementation of BIO-2 and project-specific mitigation measures and do not represent a new or more severe impact than previously analyzed by the REGPA PEIR.

5.4.4 SPECIAL-STATUS WILDLIFE

Two minor refinements to BIO-3b are requested, as further defined in ERM's Mitigation Measure Justification Memo prepared for the Project, which do not impact the analysis undertaken by the REGPA PEIR. The first refinement specifies the use of water as an alternative soil stabilizer. This is similar to the refinement made to AQ-2 (see Section 5.3.2) and is requested in response to a comment from the U.S. Fish and Wildlife Service (USFWS). The second refinement to BIO-3b is intended to align construction monitoring with the requirements established through USFWS and CDFW permits and to provide clarity regarding the interpretation of the mitigation measure.

5.4.4.1 DESERT TORTOISE

The Project Area contains desert tortoise habitat and therefore requires implementation of Mitigation Measure BIO-6. Project surveys, agency consultation, and permitting efforts have been completed in accordance with REGPA PEIR requirements. The Project incorporates desert tortoise avoidance and minimization measures, including:

- Desert tortoise exclusion fencing;
- Clearance surveys;
- Biological monitoring;
- Worker Environmental Awareness Program training;
- Relocation and translocation procedures;
- Raven management measures; and
- Coordination with USFWS and CDFW.

The Project is not located within designated critical habitat, Desert Wildlife Management Areas, Areas of Critical Environmental Concern, or designated desert tortoise recovery lands identified by BIO-6 and BIO-21. Minor refinements to BIO-6 and BIO-21 are requested, as further defined in ERM's Mitigation Measure Justification Memo prepared for the Project, which do not impact the

analysis undertaken by the REGPA PEIR. Any impacts to designated areas outlined in BIO-6, including priority connectivity areas, are mitigated to a less than significant impact through the mitigation described in Section 5.4.6.

Accordingly, the Project impacts to desert tortoise were anticipated by the REGPA PEIR and remain within the scope of impacts analyzed therein and would be reduced through implementation of applicable mitigation measures.

5.4.4.2 BURROWING OWL

Burrowing owl habitat occurs within portions of the Project Area. Surveys and mitigation requirements were developed pursuant to Mitigation Measure BIO-9. The Project incorporates pre-construction surveys, avoidance measures, and mitigation requirements consistent with the CDFW guidance and REGPA PEIR mitigation requirements.

The Project impacts to burrowing owl remain within the scope of impacts analyzed by the REGPA PEIR and would be reduced through implementation of applicable mitigation measures.

5.4.4.3 LECONTE'S THRASHER

Project-specific biological studies documented approximately 2,051 acres of potentially suitable LeConte's thrasher habitat within the Project Area. The species has been incorporated into ongoing coordination with the CDFW through the Incidental Take Permit process.

The CDFW subsequently evaluated the proposed mitigation package consisting of the Kingston View and Campito Peak mitigation sites (approximately 2,400 acres combined). Agency coordination records indicate that the CDFW determined the mitigation package provides approximately 2,300 habitat-value acres for LeConte's thrasher and concluded that the proposed mitigation package is sufficient.

LeConte's thrasher impacts would be adequately addressed through implementation of the proposed mitigation package and do not constitute a new significant impact requiring additional CEQA analysis.

5.4.4.4 MIGRATORY BIRDS AND BATS

Two minor refinements to BIO-18 are requested, as further defined in ERM’s Mitigation Measure Justification Memo prepared for the Project, which do not impact the analysis undertaken by the REGPA PEIR. The first refinement is intended to align with avian and bat monitoring requirements established through USFWS and CDFW permits. This refinement reflects the solar technology ultimately approved for the Project and the current understanding of avian risk associated with photovoltaic solar facilities. The second refinement to BIO-18 regarding vegetation inside the fenced area is intended to allow vegetation management to be implemented consistent with CDFW and USFWS guidance and agency-approved Project plans.

5.4.5 HABITAT CONNECTIVITY AND WILDLIFE MOVEMENT

The REGPA PEIR evaluated impacts to wildlife movement and habitat connectivity through Mitigation Measure BIO-21. Project-specific review determined that approximately 4.2 percent of

the 2,400-acre Developable Area is within a desert tortoise priority connectivity area. However, BIO-21 is based, in part, on conservation designations and planning information that do not reflect the USFWS' or CDFW's current, project-specific approach to desert tortoise conservation. Priority habitat connectivity areas were developed in 2009[8] using mapping technology that allowed only coarse, landscape-scale delineation of habitat areas. Now, the USFWS and CDFW assess project-specific impacts to desert tortoise through current habitat information, project-specific surveys, and applicable avoidance, minimization, and mitigation requirements established through consultation and permitting. The Project is undergoing Section 10 Endangered Species Act consultation with the USFWS under the Desert Tortoise General Conservation Plan (GCP),[9] through which Project-specific impacts and appropriate avoidance, minimization, and mitigation requirements are being addressed. Neither the GCP nor the GCP Final Environmental Impact Statement[10] reference or rely on priority connectivity areas. Instead, both documents refer to prioritizing landscape and population connectivity in a broader sense, as cited in the 2011 Revised Desert Tortoise Recovery Plan.[11]

The USFWS and CDFW have agreed to the Project's proposed mitigation approach, which includes permanent conservation of the Kingston View and Campito Peak mitigation sites totaling approximately 2,400 acres, which provide high-quality desert tortoise habitat and are strategically located adjacent to other conserved habitat, thereby helping to fill gaps between protected areas and support landscape-level habitat connectivity.

5.4.6 MITIGATION SITES

As discussed above and based on coordination with the USFWS and CDFW, the Project's mitigation strategy consists of preservation and long-term management of the Kingston View and Campito Peak mitigation sites totaling approximately 2,400 acres. Kingston View is approximately 1,859 acres and is located approximately 2 miles southeast of the Project Area, within the same regional desert tortoise recovery landscape and ecological setting. Recent biological surveys at Kingston View documented high-quality habitat, live desert tortoises at above-average densities, numerous suitable burrowing owl burrows, numerous ephemeral drainages and watercourses/active floodplains, and suitable habitat for LeConte's thrasher and the special-status plant species present in the Project Area.

Because Kingston View only comprises 1,859 acres and 2,400 acres of suitable mitigation land were required to satisfy the mitigation requirements established by the USFWS and CDFW, the Campito Peak property was identified as a second mitigation site. The approximately 2,000-acre Campito Peak is immediately south of Kingston View and is located within the same ecological

[8] Nussear, K.E., Esque, T.C., Inman, R.D., Gass, L., Thomas, K.A., Wallace, C.S.A., Blainey, J.B., Miller, D.M., and Webb, R.H., 2009. *Modeling habitat of the desert tortoise (*Gopherus agassizii*) in the Mojave and parts of the Sonoran Deserts of California, Nevada, Utah, and Arizona*: U.S. Geological Survey Open-File Report 2009-1102, 18 p.
[9] U.S. Fish and Wildlife Service. 2025. *General Conservation Plan for the Desert Tortoise in California*. Palm Springs Fish and Wildlife Office. December 2025.
[10] U.S. Fish and Wildlife Service. 2025. *General Conservation Plan for the Desert Tortoise in California Final Environmental Impact Statement*. Carlsbad Fish and Wildlife Office. June 2025.
[11] U.S. Fish and Wildlife Service. 2011. *Revised recovery plan for the Mojave population of the desert tortoise (*Gopherus agassizii*)*. Pacific Southwest Region. Sacramento, California.

setting. The Applicant is continuing to coordinate with the USFWS and CDFW and is currently conducting biological surveys to determine which portion, anticipated to comprise approximately 600 acres, would provide the greatest ecological value (based in part on habitat quality, contiguity, and regional connectivity) for the special-status species and aquatic resources to be mitigated. The final Kingston View and Campito Peak mitigation sites will provide contiguous high-quality habitat that will be preserved and maintained in perpetuity to offset Project impacts.

5.4.7 BIOLOGICAL RESOURCES CONCLUSION

Based on Project-specific biological investigations, implementation of applicable REGPA PEIR mitigation measures, ongoing coordination with the USFWS and CDFW, and preservation and long-term management of the Kingston View and Campito Peak mitigation sites (approximately 2,400 acres combined), biological resource impacts remain within the impact framework evaluated by the REGPA PEIR. The administrative record, including the CDFW's habitat-value determination for the Kingston View and Campito Peak conservation strategy, provides substantial evidence that the Project would not result in a Project-specific significant effect, substantial new information, or a substantially more severe impact than previously analyzed in the REGPA PEIR.

5.5 CULTURAL RESOURCES

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource?				X
b) Cause a substantial adverse change in the significance of an archaeological resource?				X
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
d) Disturb any human remains, including those interred outside of formal cemeteries?				X

5.5.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA. Cultural resources within the Project Area have been evaluated through records searches, field investigations, tribal consultation, and Project-level technical studies. The following analysis evaluates whether Project-

related cultural resource impacts would be peculiar to the Project or substantially more severe than those previously analyzed in the REGPA PEIR.

5.5.2 DISCUSSION

The REGPA PEIR evaluated potential impacts to historical resources, archaeological resources, tribal cultural resources, traditional cultural properties, human remains, and paleontological resources associated with utility-scale renewable energy development. Applicable mitigation measures include CUL-1, CUL-2, and PALEO-1.

Project-specific cultural resource investigations were completed for the Project and included archaeological surveys, historic resource evaluations, tribal consultation, and cultural resource impact assessments. These investigations identified cultural resources within the broader Project Area and evaluated potential Project effects in accordance with applicable federal, state, and local requirements.

The Project remains subject to implementation of CUL-1, including requirements for qualified cultural resources specialists, monitoring, resource treatment measures, worker environmental awareness training, reporting requirements, and authority to halt construction activities if previously unidentified cultural resources are encountered. Human remains discoveries remain subject to CUL-2 and applicable provisions of the California Health and Safety Code and PRC.

Based on implementation of applicable mitigation measures and Project-specific cultural resource protections, cultural resource impacts remain within the impact framework evaluated by the REGPA PEIR and do not represent substantial new information or a substantially more severe impact than previously analyzed.

5.5.3 ARCHAEOLOGICAL RESOURCES

The Project remains subject to implementation of CUL-1[12] and associated sub-measures, including retention of qualified cultural resources specialists, archaeological monitoring, preparation of treatment plans, authority to halt work, Native American monitoring, reporting requirements, and cultural resource worker awareness training.

5.5.4 OLD SPANISH NATIONAL HISTORIC TRAIL

The Project Addendum and the Non-Confidential Cultural Resources Assessment (Appendix H of the Addendum) specifically evaluated potential Project effects on the Old Spanish National Historic Trail and associated cultural landscape resources within the Charleston View area. Project-specific cultural resource studies assessed the relationship between Project facilities and the historic trail corridor, including consideration of visual, indirect, and cumulative effects. Visual simulations were incorporated into the environmental review process to evaluate potential effects on the historic setting and experience of the trail. Based on the conclusions of the Addendum and the Non-Confidential Cultural Resources Assessment, potential effects on the Old Spanish National Historic Trail were determined to remain within the range of impacts previously evaluated in the REGPA

[12] A minor refinement to CUL-1 to refer to "CRHR-eligible cultural resources" (instead of "CRHP-eligible cultural resources") is requested as further defined in ERM's Mitigation Measure Justification Memo prepared for the Project. This refinement does not impact the analysis undertaken by the REGPA PEIR.

PEIR and would not constitute a new significant impact or a substantially more severe impact than previously analyzed.

5.5.5 HUMAN REMAINS

The Project remains subject to CUL-2, requiring compliance with California Health and Safety Code Section 7050.5 and PRC Section 5097.98 in the event human remains are discovered during construction activities.

5.5.6 PALEONTOLOGICAL RESOURCES

The site-specific paleontological assessment found that surface sediments within the Project Area are generally too young to contain significant paleontological resources, and no paleontological resources were identified during field surveys or museum records searches. However, older subsurface deposits capable of preserving scientifically significant fossils may occur at depths of approximately 4 feet below ground surface, and ground-disturbing activities exceeding this depth could potentially encounter such resources. Implementation of Mitigation Measure PALEO-1, including preparation and implementation of a Paleontological Resources Management Plan and monitoring of qualifying deep excavations, would reduce potential impacts to less-than-significant levels. Based on the findings of the assessment and compliance with existing REGPA mitigation requirements, the Project would not result in any new significant paleontological impacts or substantially more severe paleontological impacts than those previously evaluated.

5.5.7 CULTURAL RESOURCES CONCLUSION

Impacts to historical resources, archaeological resources, tribal cultural resources, human remains, and paleontological resources were anticipated and analyzed by the REGPA PEIR. The Project remains subject to applicable REGPA PEIR mitigation measures and would not result in a Project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated.

5.6 GEOLOGY AND SOILS

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects involving rupture of a known earthquake fault?				X
b) Directly or indirectly cause substantial soil erosion or loss of topsoil?		X		
c) Be located on a geologic unit or soil that is unstable and could result in landslide,		X		

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
lateral spreading, subsidence, liquefaction, or collapse?				
d) Be located on expansive soil creating substantial risks to life or property?		X		
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems?				X

5.6.1 CONTEXT

The Project Area is located within the Mojave Desert region of southeastern Inyo County and would require ground disturbance associated with installation of solar arrays, substations, collector systems, and access roads. Potential impacts related to geologic hazards, seismic activity, soil erosion, and ground disturbance were previously evaluated in the REGPA PEIR. The following analysis evaluates whether Project-specific geology and soils impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.6.2 DISCUSSION

The REGPA PEIR evaluated potential impacts related to seismic hazards, fault rupture, expansive soils, erosion, liquefaction, subsidence, unstable soils, and geologic hazards associated with renewable energy development. To address these impacts, the REGPA PEIR adopted Mitigation Measure GEO-1, which requires project-specific geotechnical investigations and incorporation of resulting recommendations into Project design.

Consistent with GEO-1, project-specific geotechnical investigations were completed for the Project. These studies evaluated site soil characteristics, geologic conditions, seismic considerations, grading requirements, and engineering design recommendations. Recommendations from the geotechnical evaluation have been incorporated into Project design and will be implemented through final engineering, grading plans, and construction specifications.

The Project remains subject to applicable building code requirements, engineering design criteria, and GEO-1 implementation measures. Based on the completed geotechnical evaluation and incorporation of applicable recommendations, geology and soils impacts remain within the impact framework evaluated by the REGPA PEIR and do not constitute substantial new information or a substantially more severe impact than previously analyzed.

5.6.3 GEOLOGY AND SOILS CONCLUSION

Geology and soils impacts were anticipated and analyzed by the REGPA PEIR. The Project remains subject to GEO-1 and applicable engineering and design requirements as determined in the site-

specific geotechnical investigation and would not result in a project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated.

5.7 GREENHOUSE GAS EMISSIONS

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?		X		
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions?		X		

5.7.1 CONTEXT

The Project would generate GHG emissions primarily during construction and through limited operational activities. At the same time, the Project would contribute to regional and statewide renewable energy generation objectives by providing utility-scale solar generation capacity. GHG emissions associated with renewable energy development in the Charleston View SEDA were evaluated in the REGPA PEIR. The following analysis evaluates whether Project-specific GHG impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.7.2 DISCUSSION

The REGPA PEIR evaluated GHG emissions associated with construction and operation of utility-scale renewable energy facilities and adopted Mitigation Measure GHG-1 to address potential impacts associated with construction emissions and operational activities.

GHG emissions generated during construction and operation were estimated to be substantially below the applicable significance threshold, and the Project would support California's renewable energy and GHG reduction objectives by generating carbon-free electricity. Based on the assessment findings and implementation of applicable REGPA mitigation measures, the Project would not result in any new significant air quality or GHG impacts, nor would it result in impacts that are substantially more severe than those previously evaluated in the REGPA PEIR.

5.7.3 GREENHOUSE GAS EMISSIONS CONCLUSION

GHG emissions associated with the Project were anticipated and analyzed in the REGPA PEIR. The Project remains subject to applicable REGPA PEIR mitigation measures and would not result in a

Project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated.

5.8 HAZARDS AND HAZARDOUS MATERIALS

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or environment through routine transport, use, or disposal of hazardous materials?		X		
b) Create a significant hazard through reasonably foreseeable upset and accident conditions involving release of hazardous materials?		X		
c) Emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school?				X
d) Be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and create a significant hazard to the public or environment?				X
e) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		X		
f) Expose people or structures to a significant risk involving wildland fires?		X		

5.8.1 CONTEXT

Construction and operation of the Project would involve the transportation, storage, and use of limited quantities of fuels, lubricants, cleaning agents, and other materials commonly associated with utility-scale renewable energy facilities. Potential hazards associated with construction activities and hazardous materials handling were evaluated in the REGPA PEIR and further considered during Project-level environmental review. The following analysis evaluates whether Project-specific hazards impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.8.2 DISCUSSION

The REGPA PEIR evaluated hazards and hazardous materials impacts associated with utility-scale renewable energy development, including the transport, storage, and use of hazardous materials, emergency response considerations, wildfire hazards, and public safety concerns. Applicable mitigation measures include HAZ-1 through HAZ-4.

Project-specific environmental review included preparation of a Phase I Environmental Site Assessment and Wildfire Risk Memo. The Project will involve the use of fuels, lubricants, solvents, batteries, and other materials commonly associated with construction and operation of utility-scale solar facilities. These materials will be managed in accordance with applicable federal, state, and local regulations, permit requirements, and industry-standard safety procedures.

The Project Area is not located within one-quarter mile of an existing or proposed school and is not identified as a hazardous materials site pursuant to Government Code Section 65962.5. The Project remains subject to applicable emergency response, spill prevention, hazardous materials management, and worker safety requirements.

A site-specific Wildfire Risk Memo was prepared for the Project. The wildfire risk evaluation found that only a limited portion of the Project's fenced area (approximately 7.3 percent) overlaps a mapped Moderate Fire Hazard Severity Zone, while the remainder of the site is outside designated wildland fire hazard areas. Historical wildfire records indicate no documented wildfire events within the Charleston View area, and fire potential within the Project Area is primarily associated with localized fine fuels and noxious weeds, which would be managed through the Project’s Habitat Restoration, Revegetation, and Noxious Weed Management Plan. The assessment further concluded that the Project’s design features, including equipment setbacks, absence of battery energy storage, favorable desert-floor conditions, and ongoing vegetation management, substantially limit wildfire risk. Consistent with REGPA Mitigation Measure HAZ-4, the memorandum concludes that no additional wildfire analysis is warranted and that the Project would not result in any new significant wildfire impacts or substantially more severe wildfire impacts than those previously evaluated.

5.8.3 HAZARDS AND HAZARDOUS MATERIALS CONCLUSION

Hazards and hazardous materials impacts associated with the Project were anticipated and analyzed in the REGPA PEIR. The Project remains subject to applicable REGPA PEIR mitigation measures, construction and operational safety standards, and Conditions of Approval and would not result in a Project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated.

5.9 HYDROLOGY AND WATER QUALITY

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?		X		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management or significantly deplete groundwater supplies?		X		
c) Substantially alter the existing drainage pattern of the site or area in a manner that would result in erosion, siltation, flooding, or polluted runoff?		X		
d) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?		X		
e) Place housing or structures within a flood hazard area or otherwise expose people or structures to flood hazards?		X		
f) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management objectives?		X		

5.9.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA. Hydrology and water resource issues have been evaluated through Project-specific groundwater, drainage, and water supply analyses. The following analysis evaluates whether Project-related hydrology impacts would be peculiar to the Project or substantially more severe than those previously analyzed in the REGPA PEIR.

5.9.2 DISCUSSION

The Inyo County REGPA PEIR evaluated potential impacts associated with groundwater use, water supply availability, groundwater-dependent biological resources, hydrology, flood hazards, drainage, stormwater runoff, and water quality. To address these impacts, the County adopted mitigation measures HYD-1, HYD-2, and HYD-3, together with applicable groundwater management policies and water resource standards.

Project-specific hydrology, groundwater, and water supply analyses were completed for the Project and are documented in the Bonanza Peak Project Hydrology and Water Quality Assessment, Bonanza Peak Solar Water Supply Assessment, and the Hydrographic Basin Summary and Groundwater Monitoring Plan.[13] These studies evaluated construction and operational water demand, groundwater availability, recharge conditions, drainage characteristics, flood hazards, stormwater management, groundwater-dependent resources, and consistency with applicable County groundwater policies.

5.9.3 GROUNDWATER SUPPLY

The Project would obtain water supplies from groundwater resources within the Pahrump Valley Groundwater Basin. Additional hydrogeological analysis is provided in the Hydrographic Basin Summary and Groundwater Monitoring Plan. Project water demands associated with construction, operation, and eventual decommissioning were evaluated through the Water Supply Assessment and subsequent groundwater analyses. Water supply infrastructure includes Project water supply well facilities evaluated as part of the Project's environmental review.

The Water Supply Assessment estimated a maximum construction water demand of approximately 729 acre-feet (AF) per year during the approximately 18-month construction period, resulting in a total construction water demand of approximately 1,094 AF. Construction water demands are primarily associated with dust suppression, grading, and other construction-related activities, including approximately 89 acres of grading and site preparation.

Following construction, the Project is anticipated to operate for approximately 48.5 years. Long-term operational water demand is estimated at approximately 0.014 AF per year, resulting in a total operational demand of approximately 0.68 AF over the life of the Project. Routine panel washing is not anticipated and operational water use would be limited to infrequent maintenance and domestic uses.

The Project is also anticipated to require water during the approximately one-year decommissioning period. Because decommissioning activities would not occur until the end of the Project's useful life and a detailed decommissioning plan has not yet been developed, decommissioning water demand is inherently speculative. However, for purposes of a conservative analysis, the Water Supply Assessment assumes decommissioning would require water use equivalent to construction, resulting in an estimated decommissioning demand of approximately

[13] Kimani Brooks Consulting, Inc. 2026. Hydrographic Basin Summary and Groundwater Monitoring Plan: Bonanza Peak Solar Project.

729 AF. Based on these assumptions, total life-of-Project water demand is estimated at approximately 1,824 AF.

The Water Supply Assessment concluded that sufficient groundwater resources are available to support Project construction, operation, and decommissioning activities. The assessment further concluded that Project groundwater use, together with applicable groundwater management commitments and groundwater retirement requirements, would remain consistent with applicable groundwater management objectives and the groundwater impact assumptions evaluated by the REGPA PEIR.

5.9.4 GROUNDWATER MANAGEMENT AND WATER RIGHTS RETIREMENT

The Project remains subject to County Water Resource Policies (WR) WR-3.5 and WR-3.7, which establish requirements for groundwater conservation and groundwater rights retirement. As discussed in the Project Staff Report, the Project's groundwater retirement strategy includes long-term restrictions associated with the Kingston View and Campito Peak mitigation sites (approximately 2,400 acres combined). Retirement of groundwater use associated with these conservation properties exceeds the Project's anticipated groundwater demand and supports consistency with County groundwater management objectives.

5.9.5 GROUNDWATER DEPENDENT RESOURCES

The REGPA PEIR identified potential effects to groundwater-dependent ecosystems and biological resources as a concern requiring Project-specific review. The Project was evaluated through implementation of BIO-24, BIO-25, and HYD-2. The Water Supply Assessment and biological resource analyses concluded that Project groundwater use would not result in significant impacts to groundwater-dependent biological resources when considered in conjunction with applicable mitigation measures and groundwater management commitments.

5.9.6 DRAINAGE, FLOOD HAZARDS, AND WATER QUALITY

The Hydrology and Water Quality Assessment evaluated existing drainage conditions, stormwater runoff, erosion potential, flood hazards, and water quality. Construction activities would occur over an approximately 18-month period and include approximately 89 acres of grading associated with Project infrastructure and drainage improvements. These activities were evaluated as part of the Project-specific hydrology and water quality analyses.

The Project incorporates drainage controls, stormwater best management practices, erosion control measures, retention and detention facilities, and related design features intended to minimize stormwater and drainage impacts. The assessment concluded that implementation of applicable mitigation measures and engineering controls would avoid significant impacts associated with drainage, flooding, and water quality.

The Project will also be required to prepare and implement a Storm Water Pollution Prevention Plan and comply with applicable National Pollutant Discharge Elimination System permit requirements during construction. These requirements are consistent with the mitigation framework established by the REGPA PEIR.

5.9.7 ADDITIONAL GROUNDWATER ANALYSIS

Project groundwater resources have been evaluated through the Water Supply Assessment, Hydrology and Water Quality Assessment, and supplemental groundwater technical analyses prepared in support of Project review including the Hydrographic Basin Summary and Groundwater Monitoring Plan.[14] These analyses evaluated groundwater availability, Project water demand, groundwater management assumptions, groundwater retirement commitments, water supply well infrastructure, groundwater-dependent resources, and consistency with applicable County groundwater policies.

The supplemental groundwater analyses support the conclusion that sufficient groundwater resources are available to support Project construction, operation, and decommissioning activities. The analyses further conclude that implementation of applicable groundwater management requirements, including groundwater retirement commitments associated with the Project's conservation strategy, maintains consistency with the groundwater impact assumptions evaluated by the REGPA PEIR. Accordingly, the supplemental groundwater analyses do not identify new significant impacts, previously unidentified groundwater effects, or impacts that would occur at a substantially greater severity than analyzed in the REGPA PEIR.

5.9.8 HYDROLOGY AND WATER QUALITY CONCLUSION

Based on the Project-specific hydrology, groundwater, and water supply analyses, implementation of HYD-1, HYD-2, HYD-3, WR-3.5, WR-3.7, and other applicable Project requirements, impacts to groundwater resources, groundwater-dependent ecosystems, water supply, drainage, flooding, and water quality remain within the impact framework evaluated by the REGPA PEIR. The hydrology and water resource analyses considered an approximately 18-month construction period, an approximately 48.5-year operational life, and a one-year decommissioning period and concluded that Project water demands and hydrologic impacts remain consistent with the assumptions evaluated by the REGPA PEIR. Accordingly, the Project would not result in a project-specific significant effect peculiar to the Project or Project Area, substantial new information, a new significant impact, or an impact substantially more severe than previously analyzed in the REGPA PEIR.

5.10 LAND USE AND PLANNING

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a		X		

[14] Kimani Brooks Consulting, Inc. 2026. Hydrographic Basin Summary and Groundwater Monitoring Plan: Bonanza Peak Solar Project.

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				
c) Conflict with applicable renewable energy development standards established by the County?		X		
d) Result in development outside the areas anticipated by the REGPA PEIR?				X

5.10.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA. The Project Area is located within an area specifically identified and evaluated for renewable energy development through the REGPA planning process. The following analysis evaluates whether Project-specific land use and planning impacts would be peculiar to the Project or substantially more severe than those previously analyzed in the REGPA PEIR.

5.10.2 DISCUSSION

The Inyo County REGPA PEIR evaluated utility-scale renewable energy development within designated SEDAs, including the Charleston View SEDA. The Project is located entirely within the Charleston View SEDA and has been reviewed for consistency with the renewable energy planning framework adopted by the County.

The Project does not physically divide an established community and is located within an area specifically designated and evaluated for utility-scale solar development under the REGPA. The Project is consistent with land use assumptions, renewable energy policies, development limitations, zoning, and applicable land use regulations governing development within the Charleston View SEDA.

The Project remains within the acreage and development assumptions evaluated by the REGPA PEIR and does not result in development beyond the geographic scope of the County's renewable energy planning framework.

5.10.3 LAND USE AND PLANNING CONCLUSION

Land use and planning impacts associated with the Project were anticipated and analyzed by the REGPA PEIR. The Project is located within the Charleston View SEDA, is consistent with the County's renewable energy planning framework and zoning, and would not result in a Project-

specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated.

5.11 MINERAL RESOURCES

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the State?		X		
b) 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?		X		

5.11.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA. Potential impacts to mineral resources associated with renewable energy development within the SEDA were previously evaluated in the REGPA PEIR. The following analysis evaluates whether Project-specific impacts to mineral resources would be peculiar to the Project or substantially more severe than those previously analyzed.

5.11.2 DISCUSSION

The Inyo County REGPA PEIR evaluated the potential for renewable energy development projects to affect known mineral resources and locally important mineral resource recovery areas. The REGPA PEIR identified mineral resources as a resource topic requiring Project-specific review where extraction operations, designated mineral resource zones, or known mineral resource recovery sites may be present.

The mineral resources analysis found that the Project Area is located within a California Mineral Resource Zone (MRZ-4), indicating no known occurrences of base or precious mineral resources, and no active mines or locally important mineral resource recovery sites are present within the Project Area. Because the Project would not affect any known regionally significant mineral resources or designated mineral extraction areas, implementation would not result in the loss of mineral resource availability.

5.11.3 MINERAL RESOURCES CONCLUSION

The Project would not result in a project-specific significant effect, substantial new information, or a substantially more severe impact to mineral resources than previously evaluated in the REGPA PEIR.

5.12 NOISE

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generate excessive ground-borne vibration or ground-borne noise levels?		X		
c) Expose persons to or generate excessive noise levels associated with construction activities?		X		
d) Result in a substantial permanent increase in operational noise levels?		X		

5.12.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA.

Project construction would generate temporary noise from heavy equipment, trucks, and construction personnel. Operational noise would primarily be associated with electrical equipment, substations, and maintenance activities. Noise impacts associated with renewable energy development within the Charleston View SEDA were previously evaluated in the REGPA PEIR. The following analysis evaluates whether Project-specific noise impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.12.2 DISCUSSION

The Inyo County REGPA PEIR evaluated temporary construction noise, operational noise, ground-borne vibration, and noise impacts associated with utility-scale renewable energy development. To address potential impacts, the REGPA PEIR adopted Mitigation Measures NOI-1 and NOI-2.

The Project consists of utility-scale PV solar generation facilities, O&M facilities, substations, collector systems, sediment (stormwater) basins, existing and/or new water wells, access roads, and associated infrastructure of the type contemplated by the REGPA PEIR. Noise-generating activities would primarily occur during construction and would be temporary in nature. Long-term operational noise sources would generally be limited to equipment such as inverters, transformers, substation equipment, maintenance vehicles, and occasional operational activities, and would not exceed applicable noise standards at nearby sensitive receptors or property boundaries.

The Project remains subject to NOI-1 and NOI-2, including applicable construction controls, equipment requirements, and operational design considerations. The Project does not introduce a new category of noise source beyond those evaluated in the REGPA PEIR and remains consistent with the renewable energy development assumptions analyzed by the County.

5.12.3 NOISE CONCLUSION

Construction and operational noise impacts associated with the Project were anticipated and analyzed by the REGPA PEIR. The Project remains subject to applicable REGPA PEIR mitigation measures and would not result in a Project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated.

5.13 POPULATION AND HOUSING

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly or indirectly?		X		
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
c) Result in substantial permanent population growth requiring expansion of housing resources?				X

5.13.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA. Population and housing impacts associated with utility-scale renewable energy development were previously

evaluated in the REGPA PEIR. The following analysis evaluates whether Project-specific population and housing impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.13.2 DISCUSSION

The Inyo County REGPA PEIR evaluated population and housing impacts associated with renewable energy development, including temporary construction workforce demands and long-term operational employment associated with utility-scale renewable energy facilities. The REGPA PEIR concluded that renewable energy projects may generate temporary employment opportunities during construction but would not typically result in substantial permanent population growth or housing displacement.

The Project consists of a utility-scale PV solar facility and associated infrastructure located within the Charleston View SEDA. Construction would require a temporary workforce; however, these activities are consistent with the development assumptions evaluated by the REGPA PEIR. Long-term operation of the Project would require only a limited number of operational and maintenance personnel and would not result in substantial permanent population growth.

The Project would not displace existing residents, remove existing housing units, or require construction of replacement housing. In addition, the Project would not create a demand for new residential development beyond that anticipated in the REGPA PEIR.

5.13.3 POPULATION AND HOUSING CONCLUSION

Population and housing impacts associated with the Project were anticipated and analyzed by the REGPA PEIR. The Project would not induce substantial population growth, displace existing residents or housing, or result in a Project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated in the REGPA PEIR.

5.14 PUBLIC SERVICES

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?		X		
b) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities for law enforcement services?		X		
c) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities for emergency medical response services?		X		
d) Result in substantial adverse physical impacts associated with the provision of other public services?		X		

5.14.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA. Construction and operation of the Project may result in demands on public services, including fire protection, law enforcement, emergency response, schools, and other governmental services. Public service demands associated with renewable energy development within the Charleston View SEDA were previously evaluated in the REGPA PEIR. The following analysis evaluates whether Project-specific impacts to public services would be peculiar to the Project or substantially more severe than those previously analyzed.

5.14.2 DISCUSSION

The Inyo County REGPA PEIR evaluated potential impacts to fire protection, emergency medical response, law enforcement services, and other public services associated with utility-scale renewable energy development. To address potential impacts, the REGPA PEIR adopted Mitigation Measures PUB-1 through PUB-3.

The Project remains subject to PUB-1, which requires review of emergency response capabilities and implementation of measures necessary to maintain adequate public safety services. The public services analysis concluded that the Project would not generate substantial population growth and would require only a small operational workforce, resulting in minimal demand for fire protection, law enforcement, schools, parks, and other public services. The analysis also identified a potential community benefit associated with the Project in the form of land and financial support for a new Southern Inyo Fire Protection District facility in Charleston View, which could enhance local emergency response capabilities.

Mitigation Measures PUB-2 and PUB-3 remain applicable, where necessary, to address Project-related public safety requirements, including on-site security during construction and operation and cost recovery associated with County services. Accordingly, the Project would not result in a need for new or expanded public facilities beyond those anticipated by the REGPA PEIR.

Based on implementation of applicable mitigation measures, permit requirements, and Conditions of Approval, public service impacts remain within the impact framework evaluated by the REGPA PEIR and do not represent substantial new information or a substantially more severe impact than previously analyzed.

5.14.3 PUBLIC SERVICES CONCLUSION

Impacts to fire protection, emergency medical response, law enforcement, and other public services were anticipated and analyzed by the REGPA PEIR. The Project remains subject to applicable REGPA PEIR mitigation measures and Conditions of Approval and would not result in a Project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated.

5.15 RECREATION

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
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?				X
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				X

5.15.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA. Potential effects on recreational resources and recreational opportunities associated with renewable energy development within the SEDA were evaluated as part of the REGPA PEIR. The following analysis evaluates whether Project-specific recreation impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.15.2 DISCUSSION

The Inyo County REGPA PEIR evaluated potential recreation impacts associated with renewable energy development, including indirect increases in recreational demand resulting from population growth associated with construction and operation activities. The REGPA PEIR concluded that renewable energy projects would generally not result in substantial recreation-related impacts because they would not generate significant permanent population growth or require development of recreational facilities.

The Project consists of a utility-scale PV solar energy facility located within the Charleston View SEDA. Construction activities would require a temporary workforce; however, the Project would not induce substantial population growth, establish residential uses, or create demand for new recreational facilities. Long-term operation of the Project would require a limited workforce and would not result in increased recreational demand beyond that anticipated in the REGPA PEIR.

The Project does not include recreational facilities and would not require construction, expansion, or modification of parks, trails, or other recreational infrastructure.

5.15.3 RECREATION CONCLUSION

The Project would not increase demand for recreational facilities, require development of recreational infrastructure, or result in a project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated in the REGPA PEIR.

5.16 SOCIOECONOMICS

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Result in substantial adverse socioeconomic effects requiring new or expanded public services beyond those evaluated in the REGPA PEIR?		X		
b) Create substantial demands for public facilities or services that were not previously analyzed in the REGPA PEIR?		X		

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
c) Result in substantial adverse economic or fiscal impacts to the County beyond those anticipated by the REGPA PEIR?		X		
d) Introduce substantial new socioeconomic impacts or information not previously considered in the REGPA PEIR?				X

5.16.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA. Socioeconomic considerations associated with utility-scale renewable energy development were evaluated through the REGPA PEIR and subsequent Project-level environmental review. The following analysis evaluates whether Project-specific socioeconomic impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.16.2 DISCUSSION

The Inyo County REGPA PEIR evaluated potential socioeconomic impacts associated with renewable energy development, including temporary construction workforce demand, public service demands, fiscal considerations, and potential effects on local communities. The REGPA PEIR adopted mitigation measures SOC-1 and SOC-2 to address potential socioeconomic impacts associated with renewable energy development.

The Project consists of utility-scale renewable energy development of the type contemplated by the REGPA PEIR and is located within the Charleston View SEDA, which was specifically identified and evaluated for renewable energy development. Construction activities would generate temporary employment opportunities and associated economic activity, while long-term operation would require a limited O&M workforce. These effects are consistent with the development assumptions evaluated by the REGPA PEIR.

The REGPA PEIR adopted Mitigation Measures SOC-1 and SOC-2 to address potential socioeconomic effects associated with renewable energy development. As documented in the Project's mitigation measure compliance review, SOC-2 has been satisfied through implementation of the Development Agreements and related County requirements addressing public service costs and service demands. SOC-1 primarily addresses transient housing considerations associated with long-duration construction workforces and does not require additional project-specific mitigation beyond the socioeconomic analysis completed for the Project.

The Project does not introduce a new category of socioeconomic impact and does not represent substantial new information relative to the assumptions analyzed by the REGPA PEIR.

5.16.3 SOCIOECONOMICS CONCLUSION

Socioeconomic impacts associated with the Project were anticipated and analyzed by the REGPA PEIR. The Project remains subject to applicable REGPA PEIR mitigation measures and County requirements and would not result in a Project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated in the REGPA PEIR.

5.17 TRANSPORTATION

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?		X		
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?		X		
c) Substantially increase hazards due to a geometric design feature or incompatible uses?		X		
d) Result in inadequate emergency access?		X		

5.17.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA.

Project construction would generate temporary worker trips, equipment deliveries, and material hauling activities utilizing existing regional and local roadway networks. Operational traffic would be limited to routine maintenance and inspection activities. Transportation impacts associated with renewable energy development within the Charleston View SEDA were previously evaluated in the REGPA PEIR and supporting Project-level studies. The following analysis evaluates whether Project-specific transportation impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.17.2 DISCUSSION

The Inyo County REGPA PEIR evaluated transportation impacts associated with utility-scale renewable energy development, including construction traffic, worker trips, oversized deliveries,

roadway use, emergency access, and transportation system effects. To address potential impacts, the REGPA PEIR adopted Mitigation Measures TRA-1 and TRA-2.

The Project consists of utility-scale solar energy development within the Charleston View SEDA, a location specifically identified and evaluated for renewable energy development through the REGPA PEIR. Construction of the Project would generate temporary traffic associated with workforce travel, equipment deliveries, construction materials, and oversized loads. These transportation activities are generally consistent with the development assumptions evaluated by the REGPA PEIR.

A Project-specific transportation analysis was completed to evaluate roadway access, construction traffic, oversized equipment delivery routes, and transportation-related impacts. The Project remains subject to TRA-1 and TRA-2, including development and implementation of traffic control measures, coordination with applicable agencies, roadway protection requirements, and transportation management practices as necessary during construction.

The Project is not expected to generate substantial long-term operational traffic beyond periodic O&M activities. The Project does not introduce a new category of transportation impact or roadway use beyond the types of impacts contemplated by the REGPA PEIR. Emergency access requirements will be incorporated through Project design.

5.17.3 CONSTRUCTION TRAFFIC

Construction activities would generate temporary increases in traffic associated with personnel, equipment, and material deliveries. Construction traffic would utilize established access routes and would be managed in accordance with applicable County requirements and transportation management practices. Consistent with Mitigation Measure TRA-1, the Project would prepare and implement a Traffic Control Plan during construction. In addition, a Transportation Impact Analysis was completed pursuant to Mitigation Measure TRA-2 to evaluate transportation-related impacts and identify appropriate traffic management measures. The temporary nature of construction traffic and implementation of these measures would minimize potential impacts to roadway operations and safety.

5.17.4 OPERATIONAL TRAFFIC

Operational traffic generated by the Project would be minimal because the facility would require only a small number of personnel for routine O&M activities. Operational vehicle trips would occur intermittently and would primarily consist of employee and occasional service vehicle travel, resulting in a negligible increase in traffic on local roadways.

5.17.5 EMERGENCY ACCESS

The Project has been designed to maintain adequate site access for emergency response vehicles and service providers. Project access roads and circulation features would be constructed and maintained in accordance with applicable County standards and emergency access requirements.

5.17.6 APPLICABLE MITIGATION MEASURES

The Project remains subject to implementation of mitigation measures TRA-1, TRA-2, and associated requirements identified in the REGPA PEIR. These measures include preparation and implementation of traffic control plans, coordination with applicable agencies, maintenance of emergency access, roadway protection measures, and other transportation-related requirements intended to minimize construction and operational impacts.

5.17.7 TRANSPORTATION CONCLUSION

Transportation impacts associated with the Project were anticipated and analyzed by the REGPA PEIR. The Project remains subject to applicable REGPA PEIR mitigation measures, transportation management requirements, and any Conditions of Approval and would not result in a Project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated in the REGPA PEIR.

5.18 UTILITIES AND SERVICE SYSTEMS

WOULD THE PROJECT:	Significant Project Impact / Substantial New Information	Less Than Significant Impact with REGPA PEIR / MMRP	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded utility facilities, the construction of which could cause significant environmental effects?		X		
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?		X		
c) Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has inadequate capacity to serve the Project's projected demand?				X
d) Generate solid waste in excess of State or local standards, or impair the attainment of solid waste reduction goals?		X		

5.18.1 CONTEXT

The Project consists of utility-scale PV generation facilities, substations, collection systems, access roads, and associated infrastructure located within the Charleston View SEDA. Construction, operation, and decommissioning of the Project would require utility and service support, including

solid waste disposal, communications infrastructure, and other utility services typical of utility-scale renewable energy facilities. Utilities and service system impacts associated with development within the Charleston View SEDA were previously evaluated in the REGPA PEIR. The following analysis evaluates whether Project-specific utility and service system impacts would be peculiar to the Project or substantially more severe than those previously analyzed.

5.18.2 DISCUSSION

The Inyo County REGPA PEIR evaluated utility and service system impacts associated with renewable energy development, including water supply, wastewater disposal, solid waste generation, utility infrastructure requirements, and transmission facilities. Utility-scale solar facilities were specifically anticipated within designated SEDAs, including the Charleston View SEDA. The Project therefore represents the type of development evaluated by the REGPA PEIR.

Project-specific water supply and groundwater analyses were completed through preparation of the Bonanza Peak Solar Water Supply Assessment. That analysis concluded that sufficient water resources are available to support Project construction, operation, and decommissioning and that implementation of applicable groundwater management requirements would maintain consistency with County water resource policies.

The Project would not require a public wastewater treatment facility. Wastewater generated during operation would be minimal and would be managed through a permitted septic system and/or tile field. Therefore, the Project would not require expansion of wastewater treatment infrastructure beyond that contemplated by the REGPA PEIR.

Construction, operation, and decommissioning of the Project would generate solid waste; however, waste handling, recycling, and disposal activities would be conducted in accordance with applicable federal, state, and local regulations. The Project would not generate solid waste at levels that would exceed available disposal capacity or impair achievement of applicable waste management objectives.

The Project includes transmission and utility infrastructure necessary to support operation of the solar generation facility. Such facilities were specifically contemplated by the REGPA PEIR and are subject to applicable design standards. Accordingly, utility and service system impacts remain within the impact framework evaluated by the REGPA PEIR and do not represent substantial new information or a substantially more severe impact than previously analyzed.

5.18.3 UTILITIES AND SERVICE SYSTEMS CONCLUSION

Utility and service system impacts associated with the Project were anticipated and analyzed by the REGPA PEIR. The Project has demonstrated the availability of adequate water resources, would not require expansion of wastewater treatment facilities beyond those previously evaluated, would comply with applicable solid waste requirements, and would not result in a Project-specific significant effect, substantial new information, or a substantially more severe impact than previously evaluated in the REGPA PEIR.

6 MANDATORY FINDINGS OF SIGNIFICANCE

6.1 POTENTIAL TO DEGRADE ENVIRONMENTAL QUALITY

The Project is located within the Charleston View SEDA specifically designated and analyzed for utility-scale solar development. The Project incorporates applicable REGPA PEIR mitigation measures and Project-specific mitigation requirements developed through subsequent environmental review.

The Project would not substantially degrade environmental quality beyond the impacts previously analyzed in the REGPA PEIR.

6.2 CUMULATIVE IMPACTS

6.2.1 THRESHOLD QUESTION

Would the Project result in a cumulatively considerable impact that was not previously analyzed in the REGPA PEIR or would the Project's contribution to previously identified cumulative impacts be substantially more severe than analyzed in the REGPA PEIR?

6.2.2 DISCUSSION

CEQA Guidelines Section 15183 requires consideration of whether a proposed project would result in potentially significant cumulative impacts not discussed in the prior EIR or whether previously identified cumulative impacts would occur at a substantially greater level than previously analyzed.

The Inyo County REGPA PEIR evaluated cumulative impacts associated with implementation of the County's renewable energy planning framework, including utility-scale renewable energy development within designated SEDAs. The cumulative analysis evaluated the combined effects of renewable energy development on biological resources, water resources, visual resources, transportation, public services, cultural resources, land use, and other environmental resource topics. Importantly, the cumulative analysis was prepared with the understanding that renewable energy development would occur within designated renewable energy development areas rather than evaluating individual projects in isolation.

The Project is located entirely within the Charleston View SEDA, an area specifically designated and evaluated by the REGPA PEIR for utility-scale solar development. The Charleston View SEDA was established to accommodate utility-scale renewable energy development within an area that the County, participating agencies, landowners, and developers generally recognized as suitable for future solar development.

Consistent with those planning assumptions, renewable energy development continues to be proposed within the broader Charleston View regional area (i.e., outside the SEDA), particularly on the Nevada side of the state border. These projects include:[15]

- Yellow Pine Solar Project (constructed): a 500-MW solar project spanning approximately 3,000 acres southeast of Pahrump, Nevada.
- Purple Sage Energy Center (approved; formerly Golden Currant Solar Project), a 400-MW PV with battery storage spanning 4,534 acres off of Tecopa Road.
- Copper Rays Solar Project (proposed): a 700-MW PV facility with 700 MW of battery storage spanning approximately 4,414 acres southeast of Pahrump, Nevada, near the Clark County line.
- Mosey Solar Project (proposed): a 500-MW PV facility with battery storage spanning approximately 3,565 acres southeast of Pahrump, Nevada, in Clark and Nye Counties.
- Larrea Solar Project (proposed): a 205-MW PV facility with battery storage spanning approximately 1,233 acres southeast of Pahrump, Nevada, with interconnection proposed at the Trout Canyon Substation.
- Bonanza Peak III Energy Project (proposed): a proposed PV facility on approximately 1,324 acres south of Pahrump, Nevada, and north of Tecopa Road. The project is in its early stages and impacts will be assessed and addressed through a separate environmental review process.

In addition to the projects listed above, based on conversations with USFWS staff, it is anticipated that additional solar PV projects may be constructed in Nevada located north of Tecopa Road. If approved, mitigation for these projects is anticipated to be located south of Tecopa Road.

Collectively, these projects represent existing, approved, and reasonably foreseeable renewable energy development within the broader Charleston View, South Pahrump Valley, and southern Nevada region and provide the appropriate cumulative development context for evaluation of the Project's environmental effects. Consistent with the cumulative impact methodology applied in the REGPA PEIR, the cumulative scenario considered in this analysis includes the projects identified in REGPA PEIR Table 5.1, renewable energy development proposed within the Charleston View regional area north of Tecopa Road, associated conservation and mitigation lands south of Tecopa Road, and other reasonably foreseeable renewable energy development within the broader regional setting. The cumulative development pattern represented by these projects is consistent with the assumptions underlying establishment of the Charleston View SEDA and reflects the type of renewable energy buildout anticipated by the County when evaluating cumulative impacts and designating the Charleston View SEDA.

The cumulative impact analysis contained in the REGPA PEIR anticipated implementation of the County's renewable energy development program, including buildout of renewable energy facilities within designated development areas. The Project remains within the acreage limitations,

[15] Separately, EDF Renewables North America has proposed the "Bonanza Solar Project" located west of Indian Springs, Nevada. Due to distance from the Bonanza Peak Energy Project, the Bonanza Solar Project is not considered in this cumulative projects analysis. Additional information can be found at: https://www.permits.performance.gov/permitting-project/fast-41-covered-projects/bonanza-solar-project

generation assumptions, land use framework, and environmental impact assumptions evaluated for the Charleston View SEDA. Approval of the Project therefore does not establish a new renewable energy development area, expand the geographic footprint evaluated by the REGPA PEIR, or introduce a new category of environmental impact that was not previously considered by the County.

The cumulative impact analysis must also consider whether Project impacts, when combined with other past, present, and reasonably foreseeable future projects, would occur at a substantially greater severity than previously evaluated. As discussed throughout this Consistency Analysis, Project-specific studies addressing biological resources, hydrology and water quality, water supply, cultural resources, aesthetics, traffic, and air quality and GHG emissions concluded that Project impacts remain within the environmental impact assessment framework analyzed in the REGPA PEIR. Applicable mitigation measures adopted through the REGPA PEIR MMRP remain in effect and are supplemented by Project-specific mitigation measures, permit requirements, agency consultation commitments, conditions of approval, and conservation requirements.

Accordingly, the Project remains within the acreage, generation, land use, and environmental impact assumptions evaluated for the Charleston View SEDA. The Project does not establish a new renewable energy development area, expand the geographic footprint evaluated by the REGPA PEIR, or introduce a new category of environmental impact not previously considered. As discussed above, the cumulative development pattern occurring within the Charleston View regional area remains consistent with the renewable energy development framework evaluated through the REGPA PEIR.

6.2.3 RENEWABLE ENERGY DEVELOPMENT IN NEIGHBORING JURISDICTIONS

The administrative record includes consideration of renewable energy development occurring outside Inyo County, including development within neighboring portions of Nevada. This analysis acknowledges the existence of renewable energy development occurring within the broader regional setting. However, such projects do not alter the conclusion that the Project remains within the renewable energy development assumptions, land use framework, and cumulative impact scenario evaluated by the REGPA PEIR.

Because the Project neither expands the development capacity evaluated by the REGPA PEIR nor introduces a new category of environmental impact, the existence of additional renewable energy development in adjacent jurisdictions does not constitute substantial evidence that the Project would result in a new cumulatively considerable effect requiring additional CEQA review.

6.2.4 AESTHETICS

The REGPA PEIR evaluated cumulative visual impacts associated with implementation of renewable energy development within designated SEDAs and other reasonably foreseeable development projects. The cumulative scenario anticipated the gradual introduction of utility-scale renewable energy facilities into the Charleston View regional area and other designated renewable energy development areas. The Project, when considered together with other renewable energy development contemplated by the REGPA PEIR, would contribute to cumulative changes in visual character that were anticipated and analyzed as part of the County's renewable energy planning

framework. The Project remains subject to applicable REGPA PEIR mitigation measures and design standards. Accordingly, the Project's contribution to cumulative aesthetic impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.5 AGRICULTURE AND FORESTRY RESOURCES

The REGPA PEIR evaluated cumulative impacts to agricultural and forestry resources associated with renewable energy development. The Project would not convert prime farmland, forest land, or timberland and remains consistent with the resource assumptions evaluated by the REGPA PEIR. Accordingly, the Project would not contribute to cumulative agricultural or forestry resource impacts beyond those previously analyzed.

6.2.6 AIR QUALITY

The REGPA PEIR evaluated cumulative air quality impacts associated with construction and operation of renewable energy facilities throughout designated SEDAs. Temporary construction emissions associated with the Project would occur concurrently with other regional development activities; however, cumulative air quality impacts were specifically considered as part of the REGPA PEIR and applicable air quality mitigation measures remain in effect. The Project does not introduce a new source type or emission profile beyond those analyzed in the REGPA PEIR. Accordingly, the Project's contribution to cumulative air quality impacts would not be substantially more severe than previously analyzed.

6.2.7 BIOLOGICAL RESOURCES

The REGPA PEIR identified cumulative biological resource impacts associated with renewable energy development within the County and adopted a comprehensive mitigation framework to address those impacts. The Project remains subject to applicable biological mitigation measures adopted through the PEIR and incorporates additional Project-specific mitigation requirements developed through subsequent environmental review, agency coordination, and permit processes. These measures include conservation and long-term management of the Kingston View and Campito Peak mitigation sites (approximately 2,400 acres combined) and implementation of species-specific avoidance, minimization, monitoring, and compensatory mitigation requirements.

Therefore, the Project's contribution to cumulative biological impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.8 CULTURAL RESOURCES

The REGPA PEIR evaluated cumulative impacts to archaeological resources, historic resources, tribal cultural resources, and paleontological resources. The Project remains subject to applicable cultural resource mitigation measures, monitoring requirements, and treatment protocols. Project-specific cultural resource evaluations concluded that impacts remain within the impact framework evaluated by the REGPA PEIR. Accordingly, the Project's contribution to cumulative impacts on cultural resources would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.9 GEOLOGY AND SOILS

The REGPA PEIR evaluated cumulative impacts associated with grading, erosion, soil disturbance, seismic hazards, and geotechnical conditions associated with renewable energy development. The Project incorporates site-specific geotechnical recommendations and remains subject to GEO-1 and applicable engineering requirements. Accordingly, the Project's contribution to cumulative geology and soils impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.10 GREENHOUSE GAS EMISSIONS

The REGPA PEIR evaluated cumulative GHG emissions associated with implementation of the County's renewable energy planning program. Although construction activities would generate temporary GHG emissions, operation of the Project would contribute renewable energy generation supporting state and regional GHG reduction objectives. The Project remains consistent with the assumptions analyzed in the REGPA PEIR and would not result in a cumulatively considerable GHG impact beyond those evaluated in the prior analysis.

6.2.11 HAZARDS AND HAZARDOUS MATERIALS

The REGPA PEIR evaluated cumulative hazards associated with transportation, storage, and use of hazardous materials, wildfire exposure, and emergency response demands. The Project remains subject to applicable hazardous materials handling requirements, emergency response provisions, and wildfire protection measures. Accordingly, the Project's contribution to cumulative hazards impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.12 HYDROLOGY AND WATER QUALITY

The REGPA PEIR evaluated cumulative impacts to groundwater supply and recharge, groundwater-dependent resources, drainage, flooding, stormwater runoff, and water quality associated with renewable energy development. The REGPA PEIR also established mitigation requirements for Project-specific groundwater investigations, groundwater monitoring and management, drainage controls, and water-quality protection.

Project-specific hydrology, groundwater, and water-supply analyses evaluated an approximately 18-month construction period, an approximately 48.5-year operational life, a one-year decommissioning period, and a total life-of-Project water demand of approximately 1,824 acre-feet. These analyses concluded that sufficient groundwater resources are available to support Project construction, operation, and decommissioning and that Project groundwater use would not result in significant impacts to groundwater-dependent resources. The Project would also implement applicable groundwater-management and groundwater-retirement commitments, stormwater best management practices, erosion controls, and drainage measures.

Accordingly, when considered together with other past, present, and reasonably foreseeable development, the Project’s contribution to cumulative groundwater, drainage, flooding, and water-quality impacts would remain within the impact framework evaluated by the REGPA PEIR and would not be cumulatively considerable or substantially more severe than previously analyzed.

6.2.13 LAND USE AND PLANNING

The REGPA PEIR evaluated cumulative land use impacts associated with renewable energy development within designated renewable energy development areas. The Project is located entirely within the Charleston View SEDA and remains consistent with the land use framework and development assumptions evaluated by the REGPA PEIR. Accordingly, the Project's contribution to cumulative land use and planning impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.14 MINERAL RESOURCES

The REGPA PEIR evaluated cumulative impacts to mineral resources associated with renewable energy development, including the potential loss of access to locally important mineral resources. The Project is not located within an area containing known mineral resources of regional or statewide significance and would not interfere with existing mineral extraction activities. Accordingly, the Project would not contribute to a cumulative mineral resources impact beyond those analyzed in the REGPA PEIR.

6.2.15 NOISE

The REGPA PEIR evaluated cumulative noise impacts associated with simultaneous construction activities and operation of renewable energy facilities. Construction noise generated by the Project would be temporary and subject to applicable mitigation measures and operational controls. Operational noise sources are similar to those previously evaluated in the REGPA PEIR. Accordingly, the Project's contribution to cumulative noise impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.16 POPULATION AND HOUSING

The REGPA PEIR evaluated cumulative population and housing impacts associated with renewable energy development, including temporary construction workforce demands and long-term operational employment. The Project would require a temporary construction workforce and a limited operational workforce but would not induce substantial permanent population growth, displace existing residents or housing, or require construction of replacement housing. Accordingly, the Project’s contribution to cumulative population and housing impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.17 PUBLIC SERVICES

The REGPA PEIR evaluated cumulative impacts on fire protection, law enforcement, emergency medical response, and other public services associated with renewable energy development. The Project remains subject to PUB-1 through PUB-3 and applicable County requirements intended to address public service demands and cost recovery. Accordingly, the Project's contribution to cumulative public service impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.18 RECREATION

The REGPA PEIR determined that renewable energy development would not generate substantial recreation-related impacts because such projects do not induce substantial permanent population growth or require recreational facilities. The Project would not significantly increase recreational demand and therefore would not contribute to a cumulative recreation impact beyond those analyzed in the REGPA PEIR.

6.2.19 SOCIOECONOMICS

The REGPA PEIR evaluated cumulative socioeconomic impacts associated with temporary workforce demands, public service costs, and economic activity associated with renewable energy development. The Project remains subject to applicable socioeconomic mitigation requirements and would not introduce a new category of socioeconomic impact beyond those evaluated in the REGPA PEIR. Accordingly, the Project's contribution to cumulative socioeconomic impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.20 TRANSPORTATION

The REGPA PEIR evaluated cumulative transportation impacts associated with construction traffic, worker trips, oversized deliveries, and roadway use generated by renewable energy development. The Project remains subject to TRA-1 and TRA-2 and incorporates transportation management measures identified through Project-specific review. Accordingly, the Project's contribution to cumulative transportation impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.21 UTILITIES AND SERVICE SYSTEMS

The REGPA PEIR evaluated cumulative impacts on water supply systems, wastewater infrastructure, utility facilities, transmission systems, and solid waste disposal services. The Project has demonstrated the availability of adequate water resources and utility infrastructure and remains consistent with the utility and service system assumptions evaluated by the REGPA PEIR. Accordingly, the Project's contribution to cumulative utility and service system impacts would not be substantially more severe than analyzed in the REGPA PEIR.

6.2.22 CUMULATIVE IMPACT FINDING

Based on the foregoing:

1. The Project is located entirely within the Charleston View SEDA, an area specifically designated and evaluated by the REGPA PEIR for utility-scale renewable energy development.
2. Renewable energy development occurring within the Charleston View area, including development proposed north of Tecopa Road, is generally consistent with the renewable energy development assumptions underlying establishment of the Charleston View SEDA and the cumulative impact analysis contained in the REGPA PEIR.
3. The Project remains within the acreage, generation capacity, land use, and environmental impact assumptions evaluated by the REGPA PEIR and does not establish a new renewable

energy development area or expand the geographic development footprint evaluated by the County.

4. Applicable mitigation measures adopted through the REGPA PEIR MMRP remain in effect and are supplemented by Project-specific mitigation measures, permit requirements, agency consultation commitments, conservation requirements, and conditions of approval.
5. Project-specific analyses addressing biological resources, hydrology and water quality, water supply, cultural resources, aesthetics, transportation, air quality, and GHG emissions demonstrate that Project impacts remain within the environmental impact framework evaluated by the REGPA PEIR.
6. The Project would not result in a new cumulatively considerable impact or cause a previously identified cumulative impact to occur at a substantially greater severity than analyzed in the REGPA PEIR.

6.3 SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS

The Project would not result in a substantial adverse effect on human beings beyond impacts previously identified and analyzed by the REGPA PEIR. Applicable mitigation measures remain in effect and continue to reduce impacts to less-than-significant levels or to the level identified and accepted through prior CEQA review.

7 CEQA GUIDELINES SECTION 15183 DETERMINATION

Based on the entire administrative record, including the REGPA PEIR, the Bonanza Peak Addendum, technical studies, staff reports, agency consultation, mitigation documents, and this Consistency Analysis, the following findings support the determination that the Project qualifies for streamlining pursuant to CEQA Guidelines Section 15183.

7.1 FINDING 1

The Project is located within the Charleston View SEDA and is consistent with the type, density, intensity, location, and scale of utility-scale renewable energy development evaluated by the REGPA PEIR.

7.2 FINDING 2

The Project remains subject to applicable mitigation measures adopted through the REGPA PEIR MMRP and incorporates additional Project-specific mitigation measures, permit requirements, agency consultation commitments, conservation requirements, and Conditions of Approval developed through subsequent environmental review.

7.3 FINDING 3

No Project-specific impact peculiar to the Project or Project Area has been identified that was not analyzed in the REGPA PEIR.

7.4 FINDING 4

No new significant environmental effect has been identified that was not previously analyzed in the REGPA PEIR.

7.5 FINDING 5

No previously identified environmental impact would occur at a substantially more severe level than analyzed in the REGPA PEIR.

7.6 FINDING 6

No new cumulatively considerable impact has been identified. The Project remains within the renewable energy development framework, cumulative development assumptions, and environmental impact scenario evaluated by the REGPA PEIR and would not cause previously identified cumulative impacts to occur at a substantially greater severity than previously analyzed.

7.7 DETERMINATION

Based on the entire administrative record, the Project satisfies the requirements of CEQA Guidelines Section 15183. The Project remains consistent with the development assumptions evaluated by the REGPA PEIR and would not result in project-specific significant effects, new significant environmental effects, cumulatively considerable impacts, or impacts substantially more severe than previously analyzed. Accordingly, no additional CEQA review beyond the previously certified REGPA PEIR and associated Project-level environmental review is required.

APPENDIX A MITIGATION MEASURE CONSISTENCY REVIEW

MITIGATION MEASURE CONSISTENCY REVIEW (INTRODUCTION)

Attachment A summarizes the relationship between the applicable mitigation measures adopted through the REGPA PEIR MMRP, Project-specific Conditions of Approval, and implementation of those measures by the Project. The review compares the relevant PEIR mitigation requirements, Addendum treatment, Project commitments, supporting documentation, and implementation status.

REGPA PEIR MITIGATION MEASURE CONSISTENCY REVIEW

TABLE A-1 BONANZA PEAK ENERGY PROJECT MITIGATION MEASURE CONSISTENCY ANALYSIS

AESTHETICS

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
AES-1	Visual analysis completed	Satisfied	Consistent	Addendum and Visual Simulations
AES-2	Glare analysis completed	Satisfied	Consistent	Glare Analysis
AES-4	Visual screening requirements incorporated	Ongoing	Consistent	Site Plan / Conditions of Approval
AES-5	Lighting plan requirements incorporated	Satisfied	Consistent	Lighting Plan
AES-6	Anti-reflective solar module requirements incorporated	Ongoing	Consistent	Project Specifications
AES-9	Construction visual Best Management Practices incorporated	Ongoing	Consistent	Construction Plans
AES-10	Transmission design requirements incorporated	Ongoing	Consistent	Gen-Tie Design Documents

AGRICULTURE AND FORESTRY RESOURCES

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
AG-3	Weed management, revegetation, and invasive species control	Satisfied	Consistent	Habitat Restoration and Weed Management Plan

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
	incorporated into the Project's biological resource protection program.			

AIR QUALITY

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
AQ-1	Air Quality and GHG Emissions Report completed.	Satisfied	Consistent	Air Quality and GHG Emissions Report
AQ-2	Fugitive dust controls incorporated into construction requirements.	Ongoing	Consistent	Construction Best Management Practices

BIOLOGICAL RESOURCES

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
BIO-1	Biological Resources Technical Report prepared.	Satisfied	Consistent	Biological Resources Technical Report
BIO-2	Special-status plant surveys completed; avoidance, minimization, and mitigation measures incorporated.	Ongoing	Consistent	Biological Resources Technical Report
BIO-3	Biological monitoring, Worker Environmental Awareness Program training, restoration requirements, and permit compliance retained.	Ongoing	Consistent	Biological Resources Technical Report; Habitat Conservation Plan; Incidental Take Permit (ITP)
BIO-6	Desert tortoise avoidance and minimization program implemented.	Ongoing	Consistent	Habitat Conservation Plan; ITP; Biological Resources Technical Report;

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
				Raven Monitoring, Management, and Control Plan
BIO-7	Special-status reptile protections retained.	Satisfied	Consistent	Biological Resources Technical Report
BIO-8	Raptor survey requirements retained.	Satisfied	Consistent	Biological Resources Technical Report
BIO-9	Burrowing owl surveys and mitigation incorporated.	Ongoing	Consistent	Biological Resources Technical Report; ITP
BIO-12	Eagle consultation and survey requirements retained.	Satisfied	Consistent	Biological Resources Technical Report
BIO-14	Bighorn sheep avoidance measures retained, where applicable.	Satisfied	Consistent	Biological Resources Technical Report
BIO-17	American badger and kit fox protection measures retained.	Ongoing	Consistent	Biological Resources Technical Report; Badger and Desert Kit Fox Management Plan
BIO-18	Migratory bird and bat protection requirements retained.	Ongoing	Consistent	Avian and Bat Protection Plan; Biological Resources Technical Report
BIO-19	Sensitive natural community protection requirements retained.	Satisfied	Consistent	Biological Resources Technical Report
BIO-20	Waters and wetlands avoidance and permitting requirements retained.	Ongoing	Consistent	Basis of Design Report; Biological Resources Technical Report
BIO-21	Wildlife movement and habitat connectivity review completed.	Satisfied	Consistent	Basis of Design Report; Biological Resources Technical Report

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
BIO-22	Invasive species management requirements retained.	Satisfied	Consistent	Habitat Restoration, Revegetation, and Weed Management Plan
BIO-23	Biological design guidelines incorporated into facility layout.	Satisfied	Consistent	Site Design Documents
BIO-25	Groundwater pumping effects evaluated through biological and water resource studies.	Satisfied	Consistent	Water Supply Assessment

CULTURAL RESOURCES

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
CUL-1	Cultural resource investigations completed	Satisfied	Consistent	Cultural Resources Assessment
CUL-1a	Cultural resources lead retained	Satisfied	Consistent	Cultural Resources Assessment
CUL-1b	Treatment plan requirements retained	Ongoing	Consistent	Cultural Resources Assessment
CUL-1c	Monitoring requirements retained	Ongoing	Consistent	Monitoring Plan
CUL-1d	Stop-work authority retained	Ongoing	Consistent	Monitoring Plan
CUL-1e	Cultural Worker Environmental Awareness Program retained	Ongoing	Consistent	Worker Training Program
CUL-1f	Reporting requirements retained	Ongoing	Consistent	Monitoring Plan
CUL-1g	Curation requirements retained	Ongoing	Consistent	Monitoring Plan
CUL-2	Human remains procedures retained	Ongoing	Consistent	Monitoring Plan

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
PALEO-1	Paleontological protection requirements retained	Ongoing	Consistent	Paleontological Resources Assessment

GEOLOGY AND SOILS

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
GEO-1	Geotechnical investigation completed	Satisfied	Consistent	Geotechnical Recommendation Report

GREENHOUSE GAS EMISSIONS

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
GHG-1	GHG analysis completed	Satisfied	Consistent	Air Quality and GHG Emissions Report

HAZARDS AND HAZARDOUS MATERIALS

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
HAZ-1	Phase I Environmental Site Assessment completed	Satisfied	Consistent	Phase I Environmental Site Assessment
HAZ-4	Wildfire safety review completed	Satisfied	Consistent	Wildfire Safety Investigation

HYDROLOGY AND WATER QUALITY

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
HYD-1	Hydrology analysis completed	Satisfied	Consistent	Hydrology and Water Quality Assessment and Water Supply Assessment

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
HYD-2	Groundwater investigation completed	Satisfied	Consistent	Hydrology and Water Quality Assessment and Water Supply Assessment
HYD-3	Water quality evaluation completed	Satisfied	Consistent	Hydrology and Water Quality Assessment and Water Supply Assessment

PUBLIC SERVICES

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
PUB-1	Emergency response and public safety review incorporated	Satisfied	Consistent	Staff Report; Addendum
PUB-2	Security requirements retained	Ongoing	Consistent	Staff Report; Addendum
PUB-3	Public service cost recovery provisions retained	Ongoing	Consistent	Development Agreement / Conditions of Approval

SOCIOECONOMICS

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
SOC-2	Public service cost recovery requirements retained	Satisfied	Consistent	Development Agreement / Conditions

TRANSPORTATION

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
TRA-1	Traffic Control Plan required	Ongoing	Consistent	Traffic Control Plan

PEIR MM	Project Implementation	Status	Consistency Finding	Supporting Document
TRA-2	Transportation analysis completed	Satisfied	Consistent	Transportation Analysis

UTILITIES AND SERVICE SYSTEMS

Requirement	Project Implementation	Status	Consistency Finding	Supporting Document
Utility Interconnection Requirements	Incorporated into Project design	Ongoing	Consistent	POD; Utility Interconnection Documents
Transmission Facilities Requirements	Incorporated into Project design	Ongoing	Consistent	Gen-Tie Plans
Conditions of Approval	Applicable utility requirements retained	Ongoing	Consistent	Conditions of Approval

GENERAL CONDITIONS OF APPROVAL CONSISTENCY REVIEW

Requirement	Consistency Finding
GCOA-A Staff Report Conditions	Project subject to all final Board-approved Conditions of Approval.
GCOA-B PEIR / Addendum Compliance	Project must comply with all applicable PEIR mitigation measures and Addendum mitigation measures.
GCOA-C LeConte's Thrasher Measures	Supplemental Project-specific mitigation. Provides environmental protection beyond the 2015 PEIR because LeConte's thrasher became a significant permitting issue after PEIR certification.

OVERALL ATTACHMENT A FINDING

The Bonanza Peak Energy Project continues to implement the environmental protection framework established by the REGPA PEIR MMRP. Review of the Project-specific mitigation measures, technical studies, permit requirements, Conditions of Approval, and supplemental biological commitments demonstrate that:

1. Applicable PEIR mitigation measures continue to apply to the Project.
2. No mitigation measure has been removed in a manner that reduces environmental protection.

3. Several Project-specific measures provide equal or greater environmental protection than required by the original PEIR.
4. The Project remains consistent with the mitigation assumptions and environmental protection framework analyzed by the REGPA PEIR.

The Project would not result in new significant impacts or substantially more severe impacts than those previously analyzed by the REGPA PEIR.



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