Southern Inyo Fire Protection District

Mail: PO Box 51, Tecopa, CA 92389
Physical: 410 Tecopa Hot Springs Rd, Tecopa, CA 92389
admin@sifpd.org • Phone & Fax: (760) 852-4130 • www.sifpd.org

To: **Inyo County Board of Supervisors**
cc: Inyo County Planning Commission

October 13, 2026

From: Southern Inyo Fire Protection District

RE: Proposed Bonanza Peak solar energy project in Charleston View.

Thank you for this opportunity to address the board regarding the proposed Bonanza Peak solar installation project in Charleston View. In our capacity as an emergency response agency, SIFPD remains neutral on the question of whether the project should be approved. However, we would like to express that the community mitigation package currently offered by Bonanza Peak, should this project be approved, can make a tremendous difference to the communities of Southeast Inyo and the community of Charleston View.

As your board knows, we currently have grant money available to build a fire station in Tecopa. While we originally hoped for a full station in Tecopa and substation in Charleston View, inflation has depreciated the available funds to the point that we will build only a very basic station in Tecopa. As you also know, the 1200 square mile area of service covered by SIFPD is vast and difficult to travel with any speed.

Charleston View is growing, however its growth is inhibited by the lack of infrastructure there. Our ability to respond is diminished by the distance between Charleston View and Tecopa. The donation of 2.5 acres of land by the Wiley trust, contingent upon receipt of the proposed $2 million mitigation fund, would allow not only the construction of a substation, but potential collaboration with other county agencies and nonprofit organizations to bring more needed services to Charleston View. It could become the foundation of much needed infrastructure there, the potential beginning to measured, stable growth that can create a stable, economically viable community.

We support the board in examining all aspects of this project and weighing the public good from all possible angles. As always, we want the best for the communities we serve. That said, this project, should it go through, will be a tremendous boon to SIFPD and therefore, we believe, to those communities.

Respectfully and appreciatively,

William R. (Bill) Lutze
Fire Chief

Southern Inyo Fire Protection District
Working together to keep the heart of the Mojave safe!

October 28, 2026

Hello Everyone at Inyo County Administration on Edwards Street in Independence, California. Thank you for your hard work and service to Inyo County residents that in many instances is taken for granted.

As a property owner in Charleston View, I attended yesterday's meeting in Teccpa.

I want to be open and transparent, and as an investor in Charleston View with the goal that it becomes a viable community settlement and an economic asst to Inyo County, I am also one of many current property owners with yet to be developed parcels that support the County's approval of the land lease arrangement with the current solar energy developer.

First: With passage of the lease agreement, Inyo County greatly assists California in replacing fossil fuels with renewable energy, reducing atmospheric pollution and pulmonary disease.

Second: With the additional income from property taxes on the leased land, all Inyo County residents' benefit, even those opposing the development arrangement.

Third: The energy developer has offered ample evidence it will be a good neighbor, and the donation of construction funds for a new fire station benefits all of Charleston View and create new opportunities for property owners to now receive financing for new development.

Fourth: With the front edge of solar field set back along the Old Spanish Trail Highway , future development along the highway frontage will block and diffuse views into the site from vehicles travelling by. Along neighboring side-roads along the solar field perimeter, as good neighbors, I'm certain the developer would install simple architectural enhancements and desert landscaping including trees, shrubbery and flowering vines to the perimeter fencing to help diminish visual objections.

RAFI

Project Management | Architecture | Community Planning | Design

2850 West Horizon Ridge Lane, Suite 234 | Henderson, Nevada 89052 | (702) 435-7234

Appointing one of the developer's operational staff to a Charleston View citizen advisory committee would also bring the solar field's operations and maintenance to the table as a community resource.

All throughout my professional career I have been considered a design with nature project manager, architect, and community planner and advocate for being a good neighbor, so I have no issue with those supporting similar high-level goals pertaining to environmental sustainability and resource conservation. However, having experience assisting clients with illegal eminent domain and t*akings* cases, I was concerned with the objections to moving forward raised by the lady speaker representing the Nevada and California Basin and Range Watch. Her concerns regarding the Old Spanish Trail corridor across Inyo County towards Immigrant Pass, in my mind, impacts a ten-mile-wide swath of privately-owned property with owners having a history of paying property taxes to Inyo County. Some of these parcels may likely be developed or partially developed.

Any move to alter current Inyo County zoning and development ordinances, regulations, and guidelines including requiring new vista view sheds and other requirements via an additional Eis undertaking would invite legal repercussions lasting years of court determinations.

Suspecting minds could easily conclude this would be a successful means to stop the solar project.

Ensuring there are better tomorrows is never easy, so once again, I thank each of you for your hard work, dedication, and service to Inyo County's betterment.



California Registrant # C 6861
Dr. Robert Fielden, NCARB, FAIA

RAFI

Project Management | Architecture | Community Planning | Design

2850 West Horizon Ridge Lane, Suite 234 | Henderson, Nevada 89052 | (702) 435-7234

October 15 , 2026

Inyo County Board of Supervisors
c/o Planning Department
PO Drawer L, Independence, CA 93526

c/o Cathreen Richards
email: crichards@inyocounty.us
Cynthia Draper
email: cdraper@inyocounty.us
RE: Bonanza Peak Solar Project

Dear Supervisors Orrill, Griffiths, Marcellin, Roeser, and Wadelton,

I am Fernando Jaimes and I am the owner of APN 048-421-07 and 10 out in section 31 along the old Spanish Trail highway in Spring Valley Ranchos. I am writing to express my support to the Inyo County Board of Supervisors for the proposed 500MW Bonanza Peak Solar development out in Charleston View.

The Bonanza Peak Project could bring some much needed employment during construction and a few good permanent jobs afterward as well as business opportunities to the neighborhood as well as the surrounding region. I understand that the project site land is privately owned and I feel that if the solar project doesn't materialize, some day, in the near future it will be developed into less environmentally friendly project alternative. I believe PV solar is the best fit considering it will conserve more of our scarce resources like water and help preserve wildlife more than a future Vegas style subdivision and industrial complex or 200 plus larger scale farms with their own individual water wells. I believe it will also help preserve the long term quiet rural character of the landscape that makes our place unique . I also appreciate the fact that an equal or greater amount area of land south of the community will be mitigation land thus taking it out of the market for future development in perpetuity thus conserving even more water and other resources for those who wish to live here in Charleston View and the surrounding basin on both sides of the state line. Solar power is also one of the fastest means of increasing our regional energy supply and will help achieve regional long term energy supply goals.

Financially, the project will materially enhance property tax revenue for the area. The proposed community fund that will include assistance with priority projects like the local fire station and community development plan will go along way to create a more stable and safe environment in our neighborhood giving us a little peace of mind and stability so we can plan for the future. I am also interested to find out how I could possibly participate as a volunteer firefighter if it is approved.

The supporting research and due diligence that was conducted to support the project application as shown at: Bonanza Peak Renewable Energy Project | Inyo County California, demonstrates a commendable job to document that the project is very well conceived and will be implemented accordingly.

Very truly yours,

FERNANDO JAIMES

October 30, 2026
Attention: Inyo County Board of Supervisors And Planning Department
Cathreen Richards, Cynthia Draper
email: crichards@inyocounty.us
email: cdraper@inyocounty.us
Dear Supervisors, Planning Staff,

I am Jaime Varela and I own section 35 lot 223 and Section 29 lot 199 Spring Valley Ranchos. First, I want to thank the Inyo County Board and planning department for working with me to obtain my legal licensed cannabis cultivation license for lot 199. I hope to start to get my project up and running soon. I appreciate all of your hard work and help. I want you also know that I have attained my California Contractors license specifically because I want to help develop the Charleston View area into a great community where people are safe , secure and have a great quality of life. I want you to know that I support the Bonanza Peak Solar project. It is obviously the right and best fit for the community on that particular land because after construction it will use very little water and that saves more for the people here on the south side compared to other thing that could be built there.

I heard that the developer will be looking for volunteers for a well monitoring program. I have a well up in Section 31 behind the Desert Bloom Eco farm about ¾ of a mile off the Spanish trail , I would love to make it available for monitoring because it will give the community a little peace of mind knowing how the project will effect their wells around the community.

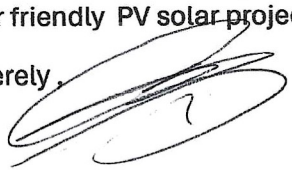
I am praying that project construction will directly and indirectly create some work for my construction company and some jobs for the neighbors during and after construction. I am certain that project approval will be a big win for those who care about the environment and water supply because the large tracts of land they are setting aside cannot be developed in the future and also leaves a safe space for native plants and animals to regenerate and thrive.

I guess that if the project isn't approve neither will our fire station and that would be a big disappointment for the people who live out here. Our lives and property are all we have as we work to build a future for out here. I think those of you in the planning department know that that I am planning to bid on the Fire Station construction project and am waiting for the notice to submit proposals for said project and pray the project is approved as soon as possible as we should not waste time getting it approved. Everyday wasted is a loss of opportunity .

It would be really disappointing if it doesn't materialize because of some outsiders who do not live here or understand the people ,culture and hardships one has to endure to live here in the Mojave desert in this place with no law enforcement outpost or fire and emergency service. We all love and want to make a future out here and this fire station and community development fund will make our lives more safe and secure giving us peace of mind and stability and an opportunity.

Obviously if this project doesn't go through. there will be something else built on this land that will be far more dangerous to the plants and animals and community water supply than this water friendly PV solar project.

Sincerely,



Jaime Valera (317)664-0227 jaime.spraymasters @gmail.com

October 14, 2026

Inyo County Planning Department
PO Drawer L, Independence, CA 93526

c/o Cathreen Richards
email: crichards@inyocounty.us

and

Cynthia Draper
email: cdraper@inyocounty.us

RE: Bonanza Peak Solar Project

Dear Ms. Richards and Ms. Draper,

On behalf of IBEW Local Union 477, I am pleased to submit this letter of support to the Inyo County Board of Supervisors for the 500MW Bonanza Peak Solar Project (the Project) proposed for construction in Charleston View, CA.

Our membership recognizes the high quality jobs that the Project will bring to the region and looks forward to working with the Project sponsors to bring it on line. We also recognize the benefits to the broader community provided by solar power to meet regional renewable energy goals and provide lower cost clean energy during the day.

We support an Inyo County staff recommendation for approval by the Inyo County Board of Supervisors of the Project as presented at the following link: Bonanza Peak Renewable Energy Project | Inyo County California. We compliment Inyo County staff for its thorough analysis and look forward to approval of the Project.

Very truly your,

Jason Eshelman

IBEW Local Union 477

Business Manager/ Financial Secretary

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

1875 S. Business Center Drive
San Bernardino, CA 92408
(909) 890-0607
(909) 890-0659 Fax

JASON L. ESHELMAN
Business Manager/Financial Secretary

BENJAMIN PRATT
President

March 21 , 2026

LETTER OF SUPPORT: Bonanza Peak Solar Application

Attention :
INYO COUNTY PLANNING DEPT
168 N. EDWARDS ST.
INDEPENDENCE CA 93526

CC: INYO COUNTY BOARD OF SUPERVISORS

DISTRICT 1: Trina Orrill
2: Jeff Griffiths
3: Scott Marcellin
4: Jennifer Roeser
5: Will Wadelton

Dear Sirs
My name is Stephen Earl McNeal. My family and I own and operate Death Valley Hot Springs Resort / Delights Hot Springs in Tecopa.

We are stakeholders and lot owners in Charleston View. We have future plans to build along Old Spanish Trail Highway and other locations. I believe the new proposed Fire Station project will help create a better environment for all investments in the area. I hope that it serves as second home for the sheriffs department . I was very happy to hear that the solar folks were open to helping community projects like the fire station and some road maintenance to mitigate migrating dust concerns among others.

We have just opened our restaurant at the Hot Springs and think a chance to professionally cater/ deliver quality fresh meals to site workers during and after construction would be a win /win for those preparing , delivering and consuming the food. Workers can get safe nutritious meals without having to leave the project site. We could also simultaneously serve the growing number of Charleston View residents. This could be an important extra source of income during summer when resorts are closed.

Having shared all that, I would like to take this opportunity to formally inform both the Planning Department and the Inyo Board of Supervisors that I am fully supportive of the Bonanza Peak Solar application and look forward the approval this project as soon as possible.

Thank you,
Stephen Earl McNeal

Stephen Earl McNeal
PO Box 368
Tecopa California
(317) 859-0004
42055@live.com

International Association of
Bridge, Structural, Ornamental, and Reinforcing Ironworkers
Local Union 416

October 14, 2026

Inyo County Planning Department
PO Drawer L, Independence, CA 93526

c/o Cathreen Richards
email: crichards@inyocounty.us

and

Cynthia Draper
email: cdraper@inyocounty.us

RE: Bonanza Peak Solar Project

Dear Ms. Richards and Ms. Draper,

On behalf of Ironworkers Local 416, I am pleased to submit this letter of support to the Inyo County Board of Supervisors for the 500MW Bonanza Peak Solar Project (the Project) proposed for construction in Charleston View, CA.

Our membership recognizes the high-quality jobs that the Project will bring to the region and looks forward to working with the Project sponsors to bring it on line. We also recognize the benefits to the broader community provided by solar power to meet regional renewable energy goals and provide lower cost clean energy during the day.

We support an Inyo County staff recommendation for approval by the Inyo County Board of Supervisors of the Project as presented at the following link: Bonanza Peak Renewable Energy Project | Inyo County California. We compliment Inyo County staff for its thorough analysis and look forward to approval of the Project.

Very truly yours,

Frankie Jimenez
Business Manager/F.S.T.

13830 San Antonio Dr., Norwalk, CA 90650 • (562) 868-1251
960 Wigwam Pkwy., Suite 130, Henderson, NV 89014 • (702) 434-7416
www.ironworkers416.org

October 28 , 2026

Inyo County Board of Supervisors
c/o Planning Department
PO Drawer L, Independence, CA 93526

c/o Cathreen Richards
email: crichards@inyocounty.us
Cynthia Draper
email: cdraper@inyocounty.us
RE: Bonanza Peak Solar Project

Dear Supervisors Orrill, Griffiths, Marcellin, Roeser, and Wadelton,

We are lot owners and residents of Charleston View , Spring Valley Ranchos , Inyo County California and we support the Bonanza Peak Solar Application approval. We hope that the project will bring some new opportunities. We support and appreciate the developers commitment to help fund the proposed Fire Station and new community plan and we hope it will bring some stability and progress to our community and improve everyone in the community's lives.

Name	Section and Lot number	Signature
Stephen McNeal	multiple lot owner 702 285 3748	Stephen McNeal
David A Lucero	Sec 32	
Nicholas Gabler	Sec 26 Lot 137 Sec 34 Lot 225 and 256	

From: James Copeland <jcopeland@deathvalleyschools.org>
Sent: Tuesday, July 15, 2025 12:51 PM
To: Cynthia Draper <cdraper@inyocounty.us>
Subject: Solar Project follow up

You don't often get email from jcopeland@deathvalleyschools.org. Learn why this is important

Cynthia -

Following find some thoughts regarding Charleston View and issues which might be addressed as the solar project moves forward -

Death Valley Unified School District does, and has, provided K-12 education to those students residing in Charleston View. What we are seeing is an increase in enrollment from families who have relocated to Charleston View. All students are transported via school bus to our high school and elementary campuses in Shoshone. We do want to share that increased construction and maintenance traffic on Old Spanish Trail will only increase the wear and tear on what is already a sub standard highway. Our hope would be that some consideration be given to highway improvements to include turnouts for bus stops as well as a highway that would comply with California state highway guidelines as to width, etc.

At present, the lack of viable emergency services for the entire of eastern Inyo County are, without a doubt, the biggest concern that our school district faces. Should we call 911 it is doubtful that there will be a response, generally not one with qualified personnel to fight fire or tackle medical aide calls. I think about this every day with hopes that some viable solution might be available. SIFPD exists in name only - not comforting for those of us responsible for young lives and those of employees.

As a result I propose the following as a partnership with our communities and the developer of this new solar project. With the transportation of lithium batteries over our roads and the siting of lithium ion batteries on the project sit the following would do a lot to allay fears and support the viability of this project. In short, DVUSD recommends that the developer financially support, on an ongoing basis, emergency services for Charleston View as well as Old Spanish Trail.

I want to be clear in stating that these monies would go to a responsible emergency services provider, in this case either CAL FIRE or Bureau of Land Management - Thus assuring that oversight and protocols would guarantee that everyone falling under this umbrella would be served by qualified and drug free personnel.

This issue further leads to our suggestion that the developer fund five full time emergency services positions staffed by trained firefighter/paramedics. While this would be expensive, the cost would pale if a fire, medical or lithium ion event cost lives. Needless to say, serious legal issues would arise if it were determined that there were no emergency services supporting this project.

Though it might be suggested that this proposal falls under the Southern Inyo Fire Protection District, it must be made clear that time and technology simply mandate a more serious effort to save lives and property. That coupled with a lack of qualified leadership guiding current SIFPD suggest that this project needs to reach beyond our local borders to ensure the safety and security of the surrounding community. Hence, the suggestion of a BLM or CAL
FIRE presence supporting our communities as well as the project staff and properties.

As to support for the Charleston View Community the school district would, without hesitation, support a road improvement effort covering some of the more traveled roads in Charleston View. This is not to suggest paved roads but, rather, some efforts including a road grader to help smooth some of those roads along with a road brush to help ensure that emergency service, school buses and residents could more easily access properties off Old Spanish Trail (I will be forwarding a map of the roads our buses traverse along with the names of the roads with the most traffic).

Thanks - anything else let me know

Jim

--
Jim Copeland
Superintendent
Death Valley Unified School District
(760) 852-4303 PH
(775) 209-4855 Cell
(760) 852-4395 Fax

www.deathvalleyschools.org

ENERGY, INSTALLATIONS
AND ENVIRONMENT

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
3400 DEFENSE PENTAGON
WASHINGTON, DC 20301-3400

July 14, 2025

Stephanie Lauer
Senior Director of Permitting, Lands, and GIS
174 Power Global
400 Spectrum Center Drive; STE 1400
Irvine, CA 92618

Dear Ms. Lauer,

As requested, the Military Aviation and Installation Assurance Siting Clearinghouse coordinated within the Department of Defense (DoD) an informal review of the Bonanza Peak Energy Project. The results of our review indicated that the solar project, located in Inyo, (CA) Nye and Clark Counties (NV), CA, as proposed, will have minimal impact on military operations conducted in the area. However, any subsequent changes will require an additional review by the DoD.

Please note that this informal review by the DoD Military Aviation and Installation Assurance Siting Clearinghouse does not constitute an action under 49 United States Code Section 44718 and that the DoD is not bound by the conclusion arrived at under this informal review. To expedite our review in the Obstruction Evaluation Airport Airspace Analysis (OE/AAA) process, please add the project number (2025-6-S-DEV-15) in the comments section of the filing. If you have any questions, please contact me at robbin.e.beard.civ@mail.mil.

Sincerely,

Robbin Beard
Acting Executive Director
Military Aviation and Installation
Assurance Siting Clearinghouse

Memorandum:
Ambiguities in the Inyo County REGPA Water Rights Retirement Policy

From: Patrick Donnelly, Center for Biological Diversity

To: Cathreen Richards, Inyo County Planning Department
Holly Alpert, Inyo County Water Department
Will Wadelton, Inyo County Commissioner, District 5

CC: Stephanie Lauer, 174 Power Global
Laura Crane, The Nature Conservancy, California Chapter
Mason Voehl, Amargosa Conservancy
Greg James, Attorney

The Inyo County Renewable Energy General Plan Amendment Policy WR-3.7 applies to renewable energy projects located in Charleston View in southeast Inyo County. It states, "Projects proposed in Charleston View shall be water sustainable and shall require project applicants to purchase and retire water rights along the same flow path for the water that will be used for the project (construction and maintenance) at a minimum of a 1 to 1 ratio."

However, there are significant questions about how this provision could be implemented. In particular, jurisdictional differences in water management practices between Nevada and California make the intent of this provision somewhat vague and difficult to implement. This memorandum will look at the history of this provision, the challenges in implementing it, and will suggest paths forward.

The Inyo County REGPA & Groundwater in Charleston View

To understand the origin of this provision we need to go back to the early part of the 2010s. While a variety of factors led to the development of the Inyo County REGPA, one of the most contentious elements was the Hidden Hills Solar Project proposal in Charleston View. This project was a "power tower" proposal, which would have consumed several hundred acre-feet of water per year, every year.

Charleston View is part of the Pahrump Valley hydrographic basin, established as Basin 162 by the USGS. Basin 162 spans Nevada and California, though it is primarily within Nevada, and almost the entirety of the population of Pahrump Valley lives on the Nevada side of the border.

Groundwater underlying Pahrump Valley and Charleston View originates as snowmelt on Mount Charleston, which then flows down both a shallow alluvial aquifer and a deep carbonate aquifer. Extensive geochemical and geologic evidence indicates that the water discharging at Shoshone Spring, Tecopa Hot Springs, the Amargosa River Canyon, and Willow Creek/China Ranch mostly also originates from Mount Charleston in Nevada. This water flows under Pahrump Valley in the deep carbonate, and then enters California and moves via three flow paths to the Shoshone-Tecopa area: via Ash Meadows and down the Amargosa River; via Chicago Valley; and via Charleston View and California Valley. So theoretically groundwater will flow off Mount Charleston, underneath Charleston View, through California, into Willow Creek, discharging at China Ranch and then reaching the Amargosa River. Thus, any new water withdrawals in Pahrump Valley and in particular Charleston View, have long raised the hackles of conservationists.

Groundwater impacts were the chief concern expressed about the Hidden Hills Solar Project by conservationists, and was a driving factor in the debate about the Inyo County REGPA during its development in 2014-2015. In particular, The Nature Conservancy's California Chapter and the Amargosa Conservancy strongly advocated for "water neutral" development in Charleston View, and for limiting the permissible technologies to those that have no annual consumption of water.

In the end, the Inyo County Supervisors elected to prohibit solar thermal projects like Hidden Hills in the REGPA, due to the technology requiring ongoing water consumption. As a compromise, the Charleston View Solar Energy Development Area (SEDA) was designated in the REGPA, and strict conservation provisions were put in place to minimize the harm that development in the SEDA would cause. Again, at the urging of The Nature Conservancy's California Chapter and the Amargosa Conservancy, Policy WR-3.7 was included in the REGPA.

Pahrump Valley Water Management in Nevada

Groundwater management in Nevada is far more advanced than in California. Given that the Amargosa is not a medium or high priority basin under California's Sustainable Groundwater Management Act, groundwater pumping in Charleston View is functionally unregulated. Basically anyone can stick a well in the ground and start pumping with no real limits on how much they pump.

By contrast, groundwater pumping in Nevada is strictly regulated. The entire state is broken up into groundwater basins, which from a management perspective are functionally regarded as discrete hydrogeologic units. Using the old USGS reconnaissance reports from the 1960s, the State Engineer (Nevada's chief water regulator) established "perennial yields" for each basin –

that is, the total amount of water that can be withdrawn each year without unduly impacting groundwater levels in the basin.

Pahrump Valley is managed as Basin 162 by the Nevada State Engineer. It has an established perennial yield of 20,000 acre-feet per year. Unfortunately, in the past water rights were issued far beyond what turned out to the perennial yield of the basin. As a result, there are 74,932 acre-feet per year of water rights issued in Basin 162.[1] Nearly that full amount was actually pumped during the 1960s and 1970s due to intensive cotton agriculture. The amount of pumping today is far less – estimated at 14,861 acre-feet per year. However this number is likely low, as it includes over 11,000 domestic wells estimated at pumping 0.5 acre-feet per year. Each domestic well is entitled to pump up to 2 acre-feet per year, and there are no meters so there is no way to verify how much each domestic well pumps. With the extensive tree cover and other irrigated landscaping around Pahrump, the 0.5 acre-feet number seems dubious. Thus pumping is likely higher than the 14,861 acre-feet per year number.

Overpumping of water in Pahrump Valley has caused groundwater levels to plummet by as much as two feet per year in some areas in the basin, causing cumulative declines of over 100 feet in the groundwater table. Clearly, pumping has far exceeded a sustainable level. There are also indications that overpumping is affecting Inyo County's water resources – springs down-gradient from Pahrump Valley in Inyo County are drying up, including Twelvemile Spring, Chappo Spring, and Tule Spring.[2]

The Nevada State Engineer has an objective of reducing groundwater appropriations in Pahrump Valley. Currently, anyone wanting to drill a new domestic well in Pahrump must purchase and retire two acre-feet of water per annum.[3] While this is well-intentioned, it has the effect of solving the problem on paper without solving it in reality. People who own unpumped paper water rights are enriched, but there's still a new domestic well and new pumping.

So there are really two discrete problems to deal with in Basin 162. First is the need to reduce pumping to a sustainable level. Given the marked declines in groundwater levels, it's clear that the sustainable level of pumping is *far less* than the 20,000 acre-foot per year perennial yield. Pumping must be reduced until it no longer reduces groundwater levels and dries up Inyo County's water sources. And second, there is a need to reduce paper water rights, which could be developed at any time. In other words, all 75,000 acre-feet of water is legally entitled to be pumped, which would be a catastrophe.

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[1] https://tools.water.nv.gov/Pumpage%20Inventories/162%20-%20Pahrump%20Valley/162%20-%202023%20-%20Pahrump%20Valley.pdf

[2] Andy Zdon, State of the Basin Report, 2020.

[3] https://images.water.nv.gov/images/Orders/1293Ao.pdf

Given the state of Basin 162, it is generally seen as a good thing by Nye County and the State Engineer to both reduce pumping and reduce paper water right allocations.

Policy WR-3.7 Is Intended to Retire Water Rights in Nevada

It must be recognized that both The Nature Conservancy, California Chapter and the Amargosa Conservancy envisioned this provision applying to water rights retirements *in Nevada.* Assuming that the Inyo County Board of Supervisors also intended for these water rights retirements to occur in Nevada is important. Otherwise, Policy WR-3.7 is illogical.

In unmanaged groundwater basins, California does not have a concept of "retiring water rights." Since pumping is not regulated in Charleston View, there is no way to retire a water right. You could plug a well, but someone can sink a well right next door and pump as much as they want. So there is no legal mechanism for water rights retirement in Charleston View, suggesting that the Inyo County Board of Supervisors intended that the retirements occur in Nevada.

There has been some concern that retiring water rights in Nevada would cause a problem with equity – wouldn't Nevada be upset to retire their own water rights to facilitate development in California? Wouldn't retiring water rights in Nevada not actually help Inyo County? The answer to both questions is no. Nevada officials would be happy to take water rights off the books in Basin 162 for any reason. And since Pahrump Valley is a single groundwater basin encompassing both sides of the border, retiring water rights on the Nevada side of the border provides a benefit to Inyo County residents and the environment by helping to bring the groundwater basin they are a part of into balance.

However, there is some uncertainty regarding Policy WR-3.7 as it applies to specific projects. Water rights in Nevada (and basically everywhere) are managed on an annual basis – in acre-feet per annum. However, water consumption by a solar project in Charleston View is likely to be a one-shot deal – withdrawals on the order of 1,000 acre-feet for construction over a 12-24 month period.[4] This is further complicated by Policy WR-3.7's requirement of a 1:1 mitigation ratio.

There is simply no mechanism to retire 1,000 acre-feet of water once. You'd be paying someone to say they won't pump 1,000 acre-feet. But who's to say they were pumping it to begin with? So there is a fundamental incongruity between what WR-3.7 is intending to mitigate and the mitigation solution provided in the Policy. There is simply no way to retire 1,000 acre-feet of water rights once.

[4] This is a broad generalization on solar projects, which generally consume about 1,000 acre-feet for construction of a 3,000 acre project.

Additionally, WR-3.7 requires that water rights retirements be on the same groundwater flow path as the withdrawals – but there are no significant annual uses of water along the Mount Charleston-Charleston View-California Valley-Willow Creek flow path.

What's the Solution?

Policy WR-3.7 is confusing and illogical as written for three reasons:

- It doesn't state where water rights retirements should happen, but the only place they could logically happen is in Nevada.
- There are no other appreciable water users along the flow path to retire water rights from.
- There is no mechanism to retire a single use of water rights. Water rights are managed on an annual basis.

We are faced with a challenge at the moment, because Bonanza Peak Solar is under permitting. There are two possible solutions to this problem:

1. The Board of Supervisors amends the REGPA to more clearly define the intent of Policy WR-3.7 to ensure that impacts to groundwater are sufficiently mitigated by any solar project in Charleston View.

OR

2. Bonanza Peak Solar reaches an agreement with the County and interested parties about acceptable mitigation measures, the Board of Supervisors uses a one-time variance to exempt the project from Policy WR-3.7, and no amendment of the REGPA is needed.

It is essential that Bonanza Peak, the County, and interested parties come to a solution about this matter. Policy WR-3.7 is not just fluff, it was put in for a reason – to ensure that impacts from projects like Bonanza Peak Solar are sufficiently mitigated so as not to harm Inyo County's residents or environment. Whether via amending the REGPA or having a project-specific agreement, steps must be taken to ensure that Inyo County's water resources are made whole by any new renewable energy development in Charleston View.

Southern Inyo Fire Protection District

Mail: PO Box 51, Tecopa, CA 92389
Physical: 410 Tecopa Hot Springs Rd, Tecopa, CA 92389
admin@sifpd.org • Phone & Fax: (760) 852-4130 • www.sifpd.org

To: **Stephanie Lauer**
Senior Director of Permitting, Lands, and GIS
174 Power Global
400 Spectrum Center Drive, Suite 1400
Irvine, CA 92618

November 20, 2025

Re: Bonanza Peak Solar Project and SIFPD

Ms. Lauer:

The Southern Inyo Fire Protection District is in receipt of your project presentation regarding the Bonanza Peak Solar Project. We appreciate that 174 Power Global has listened to the concerns of community members and decided to forgo the battery storage element of the project. This amended project proposal addresses some of the initial concerns SIFPD had about the project.

During the construction period, we anticipate an increase in demand on SIFPD's services due to the Bonanza Peak Solar Project. Your representatives stated there would be up to 450 workers employed on site for 18 months, making it likely the largest job site in Inyo County. These workers would be driving in and out of the site and engaging in construction work with heavy equipment. These activities inevitably entail some number of injuries and necessity for emergency response. Per OSHA, construction sites on average experience 2.4 non-fatal workplace injuries per 100 workers per year,[1] indicating that with 450 workers for 1.5 years, we might expect 16.2 injuries at the job site. While not all of these will necessitate emergency response, it's a clear indicator that there will be increased demands on SIFPD's services.

Additionally, there will be significantly increased vehicular traffic on Old Spanish Trail. The 450 workers will drive into and out of the site daily, increasing passenger vehicle traffic substantially. Additionally there will be gravel trucks and trucks hauling solar panels and other heavy truck traffic on Old Spanish Trail. Coupled with the high number of large RVs being towed on that road as a primary access route to Dumont Dunes, this increases the likelihood of vehicular accidents warranting SIFPD response. Old Spanish Trail is in poor shape and is not very wide, posing challenges with speeding large RVs and gravel trucks both trying to occupy the same narrow road.

Thus we believe that the construction period will entail a significant increase in demand on SIFPD's services. During the operational phase, we expect demand on our services to return to closer to baseline, as the site will not have much activity on a day-to-day basis. The odd vehicular accident or transformer fire may require our services but, at least as foreseeable at this time, the main increased draw on SIFPD's services will be during the construction phase.

We appreciate that 174 Power Global has publicly stated their intention to support SIFPD as a part of their project, including support for a new fire station in Charleston View. As you're aware, SIFPD has been awarded $1.5 million from a federal appropriation, along with $500,000 in Inyo County matching funds, in order to fund new fire station construction in both Tecopa and Charleston View. It is likely that, given inflation and the general cost of doing business in Southeast Inyo County, these funds will not be sufficient to build two fire stations.

1 https://www.enr.com/articles/57549-construction-nonfatal-injury-illness-rate-dips-as-cases-rise-slightly

Having a fire station in Charleston View is essential for SIFPD to provide emergency response services to the Bonanza Peak Solar Project. It would also be a quality of life improvement for residents of Charleston View – not only would they have increased fire protection services, but they would be able to get homeowners' insurance and mortgages, which have been difficult to obtain without a nearby fire station.

SIFPD faces many challenges, and the lack of a fire station in Charleston View is only one of them. Much of our equipment is out of date, passed down from other fire departments. If we are going to respond to incidents at a large-scale construction site, it is necessary for us to do so with modern, functional equipment. We have a list of needs enumerated below.

Additionally, SIFPD faces challenges with staffing. We have a small, dedicated group of volunteers that provides emergency response across a 1,200 square mile area. Our EMT services have been carried out by a single volunteer who is functionally on call 24-7, though we recently had a new volunteer pass his national registry test and is in the process of becoming our second EMT. Nonetheless, we still face challenges with adequate staffing, and need support in order to potentially hire full-time certified staff. New fire stations are important, but we also need people to staff them.

One final item to note is regarding call-out pay. Our volunteers get small stipends when they respond to a call, called call-out pay. Call-out pay is not financial remuneration for work, but is meant to offset the costs to volunteers for their time when they respond to an emergency. Our volunteers do this work because they love our community and they feel a calling to serve their neighbors. In recognition that our volunteers would be responding to emergencies at Bonanza Peak Solar for a for-profit company that isn't from our community, we will be requesting reimbursement from 174 Power Global for increased volunteer call-out pay for emergency response to incidents at Bonanza Peak Solar Project.

Our requests are as follows:

- Financial support for construction of the Charleston View fire station, up to $1,000,000.
- Facilitating a donation of appropriate land for the Charleston View fire station.
- Purchasing essential equipment at a total of roughly $1,000,000, including:
    - 2x 2000-gallon Water Tender fire truck w/poly or stainless tank ($150k)
    - 2x Type 4 fire engine with foam dispenser and 750-1000 gallon tank ($225k)
    - Ambulance ($150k)
    - 4x SCBAs w/ 6x 45-minute tanks ($10k)
    - Portable light plant ($30k)
    - Tower at fire station for repeater and warning siren ($20k)
    - Jaws of life ($10k)
- Ongoing financial support for SIFPD staffing and operations ($200,000/year).
- Triple call-out pay for volunteers responding to Bonanza Peak Solar incidents (as needed, ~$1k per incident).

We stand ready for further discussion with your company, Inyo County Planning, and Inyo County Supervisor Will Wadelton about how 174 Power Global can support our community through SIFPD.

Sincerely,

Robin Flinchum
SIFPD Board Chairperson
Southern Inyo Fire Protection District
Working together to keep the heart of the Mojave safe!

The New York Times https://www.nytimes.com/2025/02/10/us/california-battery-plant-fire.html

A California Battery Plant Burned. Residents Have Gotten Sick, and Anxious.

Heavy metals detected in the soil have also created health implications for Monterey County's agriculture industry, and the workers who pick the produce.

Listen to this article · 9:18 min Learn more



By Orlando Mayorquín
Reporting from northern Monterey County, Calif.

Feb. 10, 2025

The vast farmlands just off the coast of California's Monterey Bay are usually quiet during the winter, when there are no crops to pick.

This winter, a different kind of stillness has taken hold. First, fears of immigration raids paralyzed the immigrant communities that make up the agricultural work force. And now, anxiety has spread over what some in the region believe is a sprawling and silent environmental disaster.

Last month, a battery-storage plant went up in flames and burned for days, prompting the evacuation of more than 1,000 residents and shutting down local schools. The plant, located in Moss Landing, an unincorporated community in Monterey County, is the largest facility in the world that uses lithium-ion batteries to store energy. Residents have reported feeling ill, and many of them worry that the fire polluted the air, soil and water with toxins.

“Now you don’t see anybody walking outside because it’s terrifying, everything that’s going on,” said Esmeralda Ortiz, who had to evacuate from her home in Moss Landing after the plant began burning on Jan. 16.

She noticed an odd metallic odor as she and her two young children fled. She said she later took her children to the doctor after they complained of headaches and sore throats, symptoms she also had. Eventually, her children felt better, but Ms. Ortiz said she worries about the potential long-term health effects and whether the strawberry fields where she and her husband plan to work during the harvest have been contaminated.

No homes were damaged in the fire, which unfolded more than 300 miles north of the devastating Palisades and Eaton fires in the Los Angeles area. For weeks, residents, officials, researchers and environmental and public-health experts have been trying to understand the scale of damage, but so far there have been few answers. What was unleashed by the plumes of smoke from thousands of burning lithium-ion batteries? And where did it go?

“A lot of people are concerned about the ingestion of heavy metals,” said Brian Roeder, who moved his family into a rental home for the next month after they felt ill at their home in Prunedale, about eight miles southeast of the fire.

“Most people can’t do that,” Mr. Roeder, 62, said of temporarily relocating. “But we have a 7-year-old and we’re like, ‘We got to get him out of here.’”



Brian Roeder at his home in Prunedale, Calif., about eight miles southeast of the Moss Landing battery-storage plant. Ian C. Bates for The New York Times

Vistra, the Texas-based energy company that operates the plant, said there were approximately 100,000 lithium ion battery modules inside the storage facility and that most of them had burned. The company said an exact accounting had yet to be done, because crews were still prohibited from entering the facility to do a visual inspection.

Tests conducted by a state agency, the Department of Toxic Substances Control, detected cobalt, nickel, copper and manganese — heavy metals found in lithium ion batteries — at wide-ranging levels in soil sampled at eight sites near the plant and up to roughly five miles away from it. Officials said the data was preliminary and

still needed to be thoroughly analyzed. Tests of the local drinking water found the presence of the metals but at safe levels. Air quality monitoring has not detected heavy metal particles or hydrogen fluoride, a gas associated with the batteries, county officials said.

In a separate study, researchers at San Jose State University's Moss Landing Marine Laboratories in the Elkhorn Slough Reserve, an estuary next to the battery facility, found that the levels of cobalt, nickel and manganese had significantly increased in topsoil samples in the area compared to levels from studies conducted before the fire.

The results of soil testing by the state agency and the university lab were cited in a lawsuit filed on behalf of four residents by a legal team that includes the environmental activist Erin Brockovich.

The suit alleged that the amount of cobalt, manganese, nickel and copper in the preliminary state data exceeded federal Environmental Protection Agency risk levels for residential soil, including for children. The lawsuit claimed the facility's fire-suppression system was deficient. It was filed against Vistra as well as other defendants, including the state's largest utility company, Pacific Gas & Electric, which operates another energy storage facility at the Moss Landing plant.

Vistra declined to comment on the lawsuit. The company said in a statement that it was working closely with local officials and community partners. "We have and will continue to do everything we can to do right by our community and are working in concert with federal, state and local agencies to ensure public health and safety," Vistra's statement read.

PG&E said it was reviewing the complaint. In a statement, the utility said the fire was not a PG&E incident. "The Moss Landing power plant is located adjacent to — but walled off and separate from — PG&E's Moss Landing electric substation," the statement read.



Many residents worry that the fire polluted the air, soil and water. Ian C. Bates for The New York Times

Mr. Roeder has helped lead residents in collecting more than 100 of their own soil samples for testing. The preliminary results detected varying concentrations of lithium, cobalt, nickel or manganese as far as 46 miles away.

Haakon Faste, 47, who lives in Ben Lomond, a mountain community roughly 25 miles northwest of the plant, recalled a metallic taste in the air in the days after the fire broke out on Jan. 16. He and his wife experienced a number of symptoms: sore throat, headaches, bloody noses.

“It feels like you’re breathing — I don’t know if it’s like breathing acid or it’s like the air is so incredibly dry that it burns deep down into your lungs, so it hurts to swallow,” Mr. Faste said.



Soil samples from land surrounding the power plant revealed heavy metals found in lithium ion batteries. Ian C. Bates for The New York Times

The couple evacuated and moved to a short-term rental. Trips to urgent care have yielded few answers about what may have sickened them.

People who inhale high concentrations of heavy metals experience profound health effects, said Dr. Justin Colacino, an associate professor of environmental health science at the University of Michigan School of Public Health. Throat irritation,

lung inflammation and difficulty breathing can occur with heavy-metal inhalation, and manganese can have neurological effects if inhaled at high levels.

“If people in the community are reporting these, that would be consistent with what we know from folks that breathe in metals like this in an occupational setting where the levels tend to be high,” Dr. Colacino said.

Even without a full understanding of the environmental and health effects, the fire has raised questions about the safety of energy storage technology that California is relying on to meet its ambitious timeline for a clean-energy future. The Moss Landing Power Plant has stood tall over the region since 1950, generating gas-powered electricity for the state’s grid. Vistra’s lithium-ion battery facility went online at the site in 2020, in an expansion approved by the California Public Utilities Commission.

Facilities like the one in Moss Landing store excess energy collected during the day and release it as electricity into the grid at night. Presented as a step toward a carbon-free future, the expansion received little attention or resistance from the public or from interest groups, said Glenn Church, a county supervisor who represents northern Monterey County.

“We are right now in a place where government does not have the knowledge to regulate this technology and industry does not have the know-how to control it,” Mr. Church said.

When a lithium-ion battery catches fire, industry best practice is to let it burn. Dousing it with water is ineffective and can cause a chemical reaction.

“I know of no other industry that does that,” Mr. Church said of letting the material burn.

He is pushing to keep the facility off line until there is a full accounting of the cause of the fire and its fallout. In addition, Dawn Addis, the state assembly member who represents the central coast, has introduced a bill to require local input in the permitting process and new regulations for new energy storage facilities. And the utilities commission has proposed the implementation of new safety rules.



More than 1,000 residents had to evacuate when the battery-storage plant went up in flames. Ian C. Bates for The New York Times

The depositing of heavy metals onto soil carries added implications for a region known for growing strawberries and other produce, and for the workers who pick the fruit.

At a forum on immigrant rights hosted by the local school district in nearby Castroville in late January, many hands shot up when the presenter asked how many farmworkers were in the room.

“People are in a such big moment of stress that they say it’s one thing and another,” Maria Tarelo, who works packing berries, said of the fears of federal raids and the battery plant fire.

Ms. Tarelo has advised her fellow workers to take precautions by wearing masks and gloves, as they face the potential of working land that could turn out to be hazardous to their health. For many men and women who labor in the fields, the pressing concern is that contaminated crops could result in less work.

“Then we don’t have anything to pay for food or rent,” Ms. Tarelo said. “Sometimes, no matter the state of the environment, we have to go work.”

Orlando Mayorquín is a Times reporter covering California. He is based in Los Angeles.

A version of this article appears in print on , Section A, Page 10 of the New York edition with the headline: A Battery Plant Burned, And Residents Grew Sick

February 9, 2026

Cathreen Richards, Planning Director
Inyo County Planning Department
168 N. Edwards Street
Independence, CA 93526
cc: Board of Supervisors, Planning Commission, Cynthia Draper, Associate Planner

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Richard Waller, President, Old Spanish Trail Association
Lynn Brittner, Executive Director, Old Spanish Trail Association
Jack Prichett, Co-Chair, Stewardship Committee, Old Spanish Trail Association

Jack Prichett

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

Bill Helmer

Kevin Emmerich, Co-Founder
Basin and Range Watch

Laura Cunningham, California Director
Western Watersheds Project

Chandra Rosenthal, Western Lands & Rocky Mountain Advocate
Public Employees for Environmental Responsibility

Shannon Salter, Creative Coordinator
Mojave Green

Steve Bardwell, President
Morongo Basin Conservation Association

REQUEST TO SPEAK BEFORE
THE INYO COUNTY BOARD OF SUPERVISORS

Date: 10-27-26 Agenda Item No. 9

Name: Bill Helmer

Please list the number of the Agenda Item upon which you wish to speak to the Board of Supervisors. Use one card for each Agenda Item. Return the completed card to the Board Clerk before the Board considers that item on the Agenda.

Completion & Submittal of Card is Voluntary and not a Prerequisite to Address the Board But Will Help Ensure a More Orderly and Civil Meeting

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REQUEST TO SPEAK BEFORE
THE INYO COUNTY BOARD OF SUPERVISORS

Date: 10/27 Agenda Item No. SOLAR

Name: BILLY Eichenbaum

Please list the number of the Agenda Item upon which you wish to speak to the Board of Supervisors. Use one card for each Agenda Item. Return the completed card to the Board Clerk before the Board considers that item on the Agenda.

Completion & Submittal of Card is Voluntary and not a Prerequisite to Address the Board

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REQUEST TO SPEAK BEFORE
THE INYO COUNTY BOARD OF SUPERVISORS

Date: _____ Agenda Item No. 9

Name: VERNON LEE

Please list the number of the Agenda Item upon which you wish to speak to the Board of Supervisors. Use one card for each Agenda Item. Return the completed card to the Board Clerk before the Board considers that item on the Agenda.

Completion & Submittal of Card is Voluntary and not a Prerequisite to Address the Board But Will Help Ensure a More Orderly and Civil Meeting

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REQUEST TO SPEAK BEFORE
THE INYO COUNTY BOARD OF SUPERVISORS

Date: OCT. 27 Agenda Item No. BONANZA PEAK SOLAR

Name: LAURA CUNNINGHAM 9

Please list the number of the Agenda Item upon which you wish to speak to the Board of Supervisors. Use one card for each Agenda Item. Return the completed card to the Board Clerk before the Board considers that item on the Agenda.

Completion & Submittal of Card is Voluntary and not a Prerequisite to Address the Board But Will Help Ensure a More Orderly and Civil Meeting

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REQUEST TO SPEAK BEFORE
THE INYO COUNTY BOARD OF SUPERVISORS

Date: 10-27 Agenda Item No. 9

Name: MICHAEL SUMPTER

Please list the number of the Agenda Item upon which you wish to speak to the Board of Supervisors. Use one card for each Agenda Item. Return the completed card to the Board Clerk before the Board considers that item on the Agenda.

Completion & Submittal of Card is Voluntary and not a Prerequisite to Address the Board But Will Help Ensure a More Orderly and Civil Meeting

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REQUEST TO SPEAK BEFORE
THE INYO COUNTY BOARD OF SUPERVISORS

Date: 10/27/26 Agenda Item No. 9

Name: WYNNE BENTI X Gary Barclay (?)

Please list the number of the Agenda Item upon which you wish to speak to the Board of Supervisors. Use one card for each Agenda Item. Return the completed card to the Board Clerk before the Board considers that item on the Agenda.

Completion & Submittal of Card is Voluntary and not a Prerequisite to Address the Board But Will Help Ensure a More Orderly and Civil Meeting

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REQUEST TO SPEAK BEFORE
THE INYO COUNTY BOARD OF SUPERVISORS

Date: 10-27-26 Agenda Item No. 9

Name: Larry Levy

Please list the number of the Agenda Item upon which you wish to speak to the Board of Supervisors. Use one card for each Agenda Item. Return the completed card to the Board Clerk before the Board considers that item on the Agenda.

Completion & Submittal of Card is Voluntary and not a Prerequisite to Address the Board But Will Help Ensure a More Orderly and Civil Meeting

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REQUEST TO SPEAK BEFORE
THE INYO COUNTY BOARD OF SUPERVISORS

Date: 10/27/26 Agenda Item No. 9

Name: Patrick Donnelly

Please list the number of the Agenda Item upon which you wish to speak to the Board of Supervisors. Use one card for each Agenda Item. Return the completed card to the Board Clerk before the Board considers that item on the Agenda.

Completion & Submittal of Card is Voluntary and not a Prerequisite to Address the Board But Will Help Ensure a More Orderly and Civil Meeting

HANWHA RENEWABLES
400 SPECTRUM CENTER DRIVE
IRVINE, CA 92618

September 28, 2026

Cathreen Richards
Planning Director
Inyo County Planning Department
168 North Edwards Street
Independence, California 93526

Re: Bonanza Peak Energy Project, Response to Center for Biological Diversity Memorandum Regarding Policy WR-3.7

Dear Ms. Richards:

Bonanza Peak Solar, LLC, a subsidiary of Hanwha Renewables, (Bonanza Peak) submits this letter in response to the memorandum from Patrick Donnelly of the Center for Biological Diversity (CBD) concerning implementation of Inyo County General Plan Policy WR-3.7 for the Bonanza Peak Solar Project (Project) (CBD Memorandum). Bonanza Peak appreciates CBD's attention to groundwater sustainability in the Charleston View Solar Energy Development Area and the implementation questions identified in the CBD Memorandum.

This response is intended to provide CBD with an update regarding the treatment of Policy WR-3.7 in the County's current Project record and proposed approval framework. It does not speak for the County or prejudge the Board of Supervisors' consideration of the Project, the proposed Renewable Energy Development Agreements (REDAs), or the associated conditions of approval.

Policy WR-3.7 and the Proposed Project-Specific Approach

Policy WR-3.7 requires projects proposed in Charleston View to be water sustainable and requires applicants to purchase and retire water rights along the same flow path as the water used for Project construction and maintenance at a minimum ratio of 1:1. The CBD Memorandum identifies practical questions regarding implementation of that language and presents two potential courses of action. The second proposed course contemplates a project-specific agreement regarding acceptable mitigation measures, together with what the memorandum characterizes as a one-time variance from Policy WR-3.7.

We understand the net result of working through the County's review process to be that the current proposed approval framework would effectuate the substance of the CBD Memorandum's second proposed course of action, with one important caveat: a variance from Policy WR-3.7 would not be required. The proposed REDAs and conditions of approval provide a Project-specific, enforceable framework addressing the groundwater-conservation purpose of the policy. The result reflects the outcome of the Project review and coordination process undertaken with the County.

Bonanza Peak owns 1,880 acres of private land (referred to as Kingston View) just south of the Project area in the same groundwater basin as the Project (Attachment 1). This land will be used as mitigation for Project impacts to satisfy California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) requirements, and the land will be put under conservation easement in perpetuity. Under the proposed conditions, Bonanza Peak would prepare and record deed restrictions covering the Kingston View mitigation land. The restrictions would disallow, or have the effect of disallowing, groundwater use or export from those parcels in perpetuity, except for onsite water use associated with environmental mitigation activities dictated by CDFW and/or USFWS, if any. The proposed REDAs expressly identify these restrictions as

a requirement intended to meet General Plan Policy WR-3.7. Separately, the proposed conditions include a Groundwater Monitoring and Contingency Plan for voluntarily-participating residential wells within one-half mile of the Project production wells during construction. The plan would include monitoring and reporting requirements, together with contingency measures if water levels in participating wells drop below thresholds as a result of Project construction activities based on preconstruction trends.

The Planning Commission staff report compares the Project's estimated water use over its 50-year life with potential groundwater use associated with development that could otherwise occur on the mitigation Kingston View parcels under their current General Plan and zoning designations. Based on that analysis, County staff concluded that the proposed restrictions would preserve more groundwater than the Project would use, would provide more than a 1:1 groundwater benefit, and would place the Project in substantial conformance with Policy WR-3.7.

Accordingly, the current County record does not rely on or propose a variance from Policy WR-3.7. Instead, the proposed approval framework reflects County staff's conclusion that the Project, subject to the perpetual Kingston View groundwater restrictions, would substantially conform to Policy WR-3.7.

The CBD Memorandum also emphasizes the importance of ensuring that groundwater effects are sufficiently evaluated and addressed. Inyo County has provided this Policy WR-3.7 discussion in the Planning Commission staff report; the proposed water rights condition in Exhibit C to the REDAs; Section 5.IX, "Hydrology and Water Quality," of the Bonanza Peak Renewable Energy Project Final Initial Study/Addendum; Appendix M, "Hydrology and Water Quality Assessment"; and Appendix N, "Water Supply Assessment." These materials provide additional information regarding Project water demand, groundwater conditions, potential effects on local aquifers and wells, and the applicable monitoring and groundwater-protection measures.

We hope this response is helpful in clarifying for CBD how the implementation concern identified in its memorandum is addressed in the current Project record. In substance, the proposed Project-specific agreement and conditions would provide the enforceable groundwater-conservation mechanism contemplated by the memorandum's second proposed course of action. The distinction is that County staff concluded that the proposed restrictions would result in substantial conformance with Policy WR-3.7, and therefore that a variance from Policy WR-3.7 is not necessary.

Bonanza Peak appreciates CBD's engagement regarding groundwater sustainability in Charleston View and the opportunity to provide this updated Project context. We will continue to work with the County and other interested parties as the County completes its independent review and consideration of the Project.

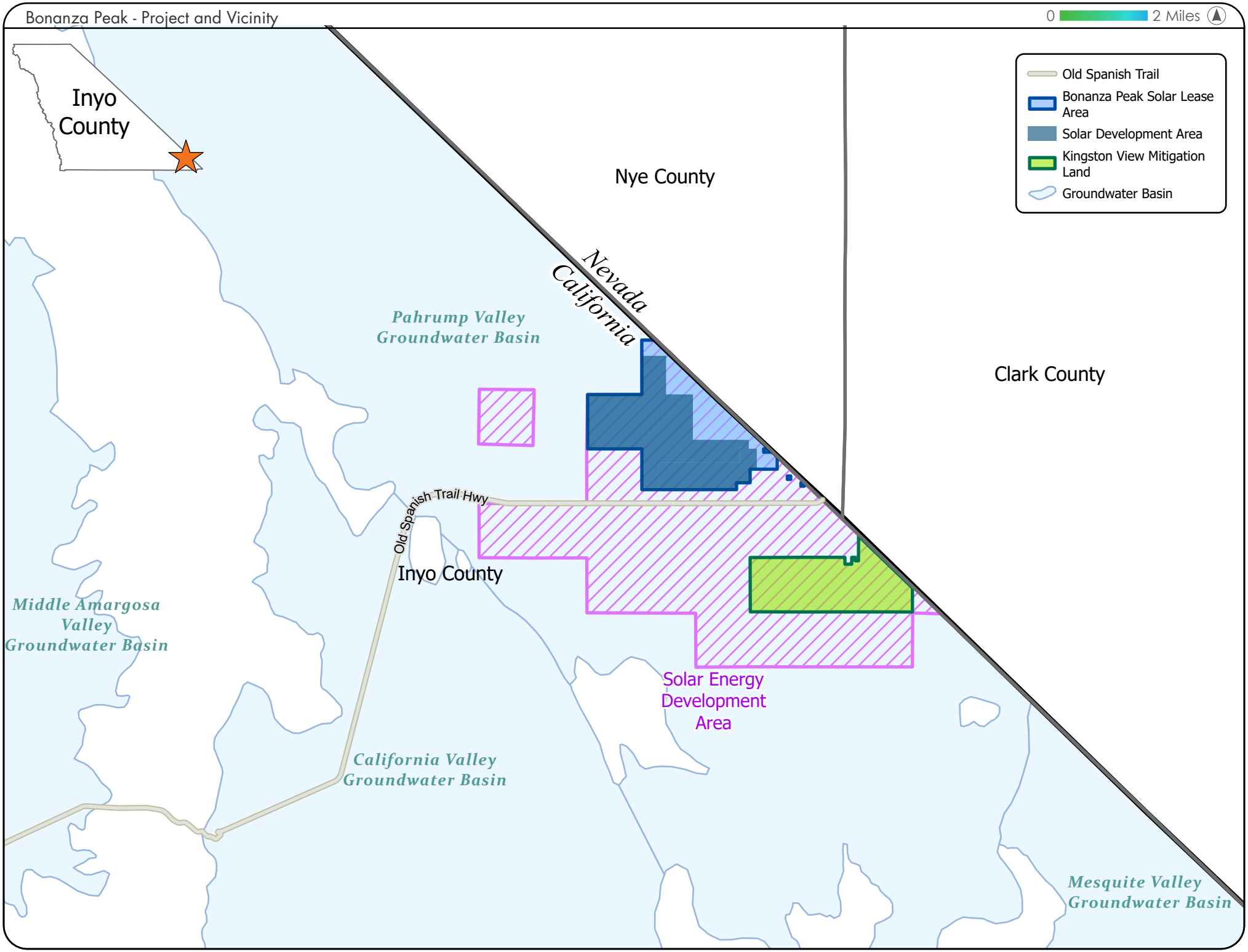
Sincerely,



Stephanie Lauer
Senior Director, Permitting
Bonanza Peak Solar, LLC

Attachment 1: Bonanza Peak – Project and Vicinity, Groundwater Basins

CC: Patrick Donnelly, Center for Biological Diversity


Bonanza Peak - Project and Vicinity
0
2 Miles
Old Spanish Trail
Bonanza Peak Solar Lease Area
Solar Development Area
Kingston View Mitigation Land
Groundwater Basin
Inyo County
Nye County
Nevada
California
Clark County
Pahrump Valley Groundwater Basin
Old Spanish Trail Hwy
Inyo County
Middle Amargosa Valley Groundwater Basin
Solar Energy Development Area
California Valley Groundwater Basin
Mesquite Valley Groundwater Basin

HANWHA RENEWABLES
400 SPECTRUM CENTER DRIVE
IRVINE, CA 92618

September 28, 2026

Cathreen Richards
Planning Director
Inyo County Planning Department
168 North Edwards Street
Independence, California 93526

Re: Bonanza Peak Energy Project, Response to February 9, 2026 Correspondence Regarding Environmental Review

Dear Ms. Richards:

Bonanza Peak Solar, LLC, a subsidiary of Hanwha Renewables (Bonanza Peak) submits this letter in response to the concerns regarding environmental review of the Bonanza Peak Solar Project (Project) raised in the February 9, 2026 letter from the Old Spanish Trail Association and the other signatories (collectively, the Co-signatories) (February 9 Letter). Hanwha appreciates the Co-signatories' engagement in Inyo County's review of the Project and the importance of the environmental, cultural, and community issues identified in the February 9 Letter.

This response is based on the Bonanza Peak Renewable Energy Project Final Initial Study/Addendum, dated September 2026 (Addendum). The Addendum is supported by Project-specific technical studies prepared to evaluate the environmental topics discussed in the February 9 Letter.

As lead agency under the California Environmental Quality Act (CEQA), Inyo County prepared the Addendum pursuant to CEQA Guidelines Section 15164 after determining that the Project does not trigger the need for supplemental or subsequent environmental review under CEQA Guidelines Section 15162. This letter does not independently opine on or speak for the County regarding that determination. Rather, it is intended to identify where the concerns raised in the February 9 Letter are evaluated in the Addendum and supporting technical studies and to provide relevant Project context.

Issues Raised in the February 9 Letter

The February 9 Letter requests preparation of a Project-specific Subsequent Environmental Impact Report and contrasts the Project with the former Hidden Hills Solar Electric Generating System. The Addendum provides a site-specific evaluation of the Project, supported by current technical studies, within the programmatic framework established by the 2015 Renewable Energy General Plan Amendment Program Environmental Impact Report (REGPA PEIR). It evaluates the Project as currently proposed, a photovoltaic solar facility rather than the solar thermal power tower facility proposed as part of Hidden Hills in 2012. The Co-signatories can refer generally to Sections 1.0 through 5.0 of the Addendum, including the Project background, Project description, technical studies, and resource-specific environmental analyses discussed below.

Air Quality. The February 9 Letter raises concerns regarding construction-related fugitive dust and potential effects on nearby communities. These issues are evaluated in Section 5.III, "Air Quality," including construction emissions, fugitive dust generation, applicable Great Basin Unified Air Pollution Control District requirements, and potential health risks to nearby sensitive receptors. The analysis incorporates Project-specific emissions modeling and a health risk screening. It identifies REGPA PEIR Mitigation Measure AQ-1,

requiring a site-specific air quality technical report, as satisfied through preparation of the Project's Air Quality and Greenhouse Gas Emissions Report; requires implementation of REGPA PEIR Mitigation Measure AQ-2 to reduce fugitive dust and particulate matter emissions during construction; and concludes that REGPA PEIR Mitigation Measure AQ-3 would not be applicable because of the Project's very low operational dust emissions. With implementation of Mitigation Measure AQ-2, the Addendum concludes that the Project's air quality impacts would be less than significant and would not be new or substantially more severe than those evaluated in the REGPA PEIR. Addendum Appendix F, "Air Quality and Greenhouse Gas Report" provides additional detail.

Groundwater Resources. The February 9 Letter raises concerns regarding construction water demand, groundwater depletion, and effects on local wells. These issues are evaluated in Section 5.IX, "Hydrology and Water Quality," including anticipated water demand, the proposed use of groundwater from the Pahrump Valley Groundwater Basin, basin conditions, groundwater recharge, and potential effects on local aquifers and wells. The Addendum estimates that construction would require approximately 1,085 acre-feet of water over the approximately 18-month construction period, while normal operation would require approximately 0.014 acre-feet per year. The analysis identifies REGPA PEIR Mitigation Measures HYD-1 and HYD-3 as satisfied through the Project-specific technical studies and requires implementation of the remaining applicable provisions of Mitigation Measure HYD-2. Those provisions include evaluation and implementation of appropriate groundwater-recharge measures during final design, monitoring of local aquifer and private and production well levels, restrictions on Project-related groundwater withdrawals where necessary to avoid significant adverse effects, and mitigation for affected wells or other groundwater-dependent uses where applicable. With implementation of Mitigation Measure HYD-2, the Addendum concludes that the Project's effects on groundwater supplies and recharge would be less than significant and would not be new or substantially more severe than those evaluated in the REGPA PEIR. The Co-signatories can refer to Appendix M, "Hydrology and Water Quality Assessment," Appendix N, "Water Supply Assessment," and Appendix O, "Drainage Report," for additional detail.

Cultural Resources and the Old Spanish National Historic Trail. The February 9 Letter raises concerns regarding cultural resources and potential effects on the Old Spanish National Historic Trail (OSNHT), including effects on its historic setting, viewshed, and experiential integrity. These issues are addressed through the Project's cultural resources and visual resources analyses. Addendum Section 5.V, "Cultural Resources," and Appendix H, "Non-Confidential Cultural Resources Assessment," provides information regarding the cultural resources investigations, identified resources, significance evaluations, and applicable mitigation and monitoring measures. Section 5.I, "Aesthetics," and Appendix C, "Visual Simulations," address visual character and public views in the Project vicinity. Together, these materials provide information relevant to the concerns raised in the February 9 Letter.

Cultural resources work continued after completion of the assessment included as Appendix H to the Addendum. On September 11, 2026, the Project team submitted to the County an updated non-confidential Cultural Resources Assessment dated September 3, 2026. The revised assessment supersedes the December 2025 report and incorporates supplemental background research, survey work, and targeted Extended Phase I archaeological testing undertaken to support updated resource evaluations and eligibility recommendations. The testing found that cultural materials at the evaluated sites were largely confined to surface contexts and did not identify intact subsurface cultural deposits. Based on the available field data, the revised assessment recommends that none of the 25 archaeological sites evaluated through the testing program is eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). Because the Project Study Area retains moderate potential for previously unidentified buried cultural resources in areas not subject to testing, the revised assessment continues to recommend archaeological monitoring, worker training, stop-work authority, and procedures for evaluating and treating previously unidentified resources. The County has posted the September 3, 2026 non-

confidential revised assessment on its Project webpage in place of the earlier public report. At the time of writing, the publicly posted report version does not include the in-progress confidential appendices.

Additionally, the revised assessment separately considers the OSNHT using currently available National Trails System alignment information. That information places the documented OSNHT alignment outside the Project's Developed Area and approximately 1.5 miles from the planned solar photovoltaic facility. Project access road segments would be located north of Old Spanish Trail Highway/Tecopa Road, and the intervening area includes existing roads. Based on the currently documented alignment, the distance and intervening development, and the absence of anticipated direct disturbance to that trail route, the revised assessment concludes that the Project is not expected to result in a historical resource impact to the OSNHT. That conclusion is consistent with the Project's visual resources evaluation, which concludes that the proposed facilities would not degrade the existing visual character or quality of public views in the Project vicinity.

We understand that the Co-signatories may also be seeking recognition of additional route segments or associated trail features in California beyond the OSNHT alignment reflected in the currently available information reviewed for the revised assessment. The cultural resources investigations reviewed available federal, State, and local records, prior studies, historical mapping and imagery, and field survey results. The assessment concluded that previously recorded linear resources on the Project area are not contributing elements to the OSNHT and are not eligible for the NRHP or in the CRHR. If an appropriate agency formally documents or designates additional route information relevant to the Project area, that information can be considered through the applicable review process. Based on the information currently available, however, the revised assessment evaluates the documented OSNHT alignment and the cultural resources identified within the Project Study Area and does not identify a historical resource impact to the OSNHT.

Wildlife. The February 9 Letter raises concerns regarding habitat for desert tortoise, burrowing owl, desert kit fox, and migratory birds, as well as potential effects on landscape connectivity for desert bighorn sheep. These issues are evaluated in Section 5.IV, "Biological Resources," of the Addendum and Appendix G, "Biological Resources Technical Report." The project-specific analysis incorporates desktop review, habitat assessments, and field surveys conducted between 2020 and 2025. Those investigations documented desert tortoise and burrowing owl individuals and sign, desert kit fox sign, migratory and other special-status birds, and other wildlife within the survey area. A horn fragment possibly associated with desert bighorn sheep was also documented and was believed to have washed downslope from the nearby mountains.

The Addendum identifies measures applicable to the species and concerns raised in the February 9 Letter, including special-status wildlife surveys and biological monitoring; desert tortoise avoidance, exclusion, clearance, and relocation or translocation requirements; burrowing owl surveys, avoidance buffers, and compensatory mitigation where required; an American badger and desert kit fox management plan; nesting-bird surveys and avian-protection measures; raven monitoring, management, and control measures; and agency coordination regarding desert bighorn sheep and potential movement routes. The Co-signatories may also wish to refer to Appendix Q, "LeConte's Thrasher CEQA Impact Analysis Memorandum," and Appendix S, "Raven Monitoring, Management, and Control Plan," for additional information regarding special-status and migratory birds. The Project requires consultation with the California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) and applicable take authorization for listed species before Project activities that could result in take. The Project team continues to coordinate with these agencies regarding applicable biological permitting, mitigation, and monitoring requirements. With implementation of the applicable REGPA PEIR mitigation measures and the Project-specific conditions identified for LeConte's thrasher, the Addendum concludes that impacts to special-status wildlife would be less than significant and would not be new or substantially more severe than those evaluated in the REGPA PEIR.

Rare Plants and Vegetation. The February 9 Letter raises concerns regarding native vegetation, rare plants, including Pahrump buckwheat, and the potential for ground disturbance to facilitate invasive weeds and result in long-term herbicide use. These issues are evaluated in Section 5.IV, "Biological Resources," and Appendix G, "Biological Resources Technical Report," of the Addendum. Project-specific botanical surveys documented eight special-status plant species, including five species protected under the California Desert Native Plants Act and three species ranked by the California Native Plant Society; no federally or State-listed plant species were detected. The applicable REGPA PEIR Mitigation Measure BIO-2 requires avoidance and minimization of effects on special-status plants to the maximum extent feasible and species-specific mitigation where complete avoidance is not feasible.

The Project is also subject to REGPA PEIR Mitigation Measure BIO-22, which requires measures to limit vegetation and ground disturbance, prevent the introduction and spread of invasive weeds, and require the prompt reestablishment of native vegetation in disturbed areas. Surveys completed to date on the proposed mitigation lands have documented many of the California Native Plant Society-ranked special-status species identified in the Project Area. CDFW has reviewed the proposed mitigation lands and mitigation approach and has not identified a need for additional mitigation lands or species-specific measures. Furthermore, surveys and management planning for the mitigation lands will continue as mitigation implementation progresses. The Addendum explains that preparation of the Project's Habitat Restoration, Revegetation, and Noxious Weed Control Plan satisfies the requirements of Mitigation Measure BIO-22.

The Project's Habitat Restoration, Revegetation, and Noxious Weed Control Plan has been reviewed and approved by both CDFW and USFWS. During that review process, the agencies provided recommendations regarding restoration, maintenance, and invasive species management, including the use of herbicides where appropriate, and those recommendations were incorporated into the final plan. Applicable measures do not require long-term herbicide use. Herbicides, if needed, would be applied as targeted spot treatments to address specific invasive weed occurrences and would not be used on a routine or continuous basis. REGPA PEIR Mitigation Measure BIO-3 prohibits preemergent and other herbicides with documented residual toxicity and requires herbicide applications to comply with applicable federal, State, and local laws and wildlife-safe-use guidance. With implementation of the applicable measures, the Addendum concludes that impacts would be less than significant and would not be new or substantially more severe than those evaluated in the REGPA PEIR.

Public Health and Property Values. The February 9 Letter raises concerns regarding potential public health effects from fugitive dust and groundwater drawdown, as well as potential effects on community desirability and property values associated with changes to the visual environment. The public health issues are evaluated in Section 5.III, "Air Quality," and Section 5.IX, "Hydrology and Water Quality," of the Addendum. As discussed above, the air quality analysis includes a Project-specific health risk screening and concludes that estimated construction and operational health risks would remain below the applicable screening thresholds. The groundwater analysis evaluates Project water demand and potential effects on local aquifers and wells. The Addendum identifies measures to control fugitive dust and provides for monitoring and other responsive measures, as applicable, to avoid or address significant Project-related effects on local groundwater levels and wells. The groundwater measures include monitoring local aquifer and private and production well levels, restricting Project-related groundwater withdrawals where necessary to avoid significant adverse effects, and providing mitigation for affected wells or other groundwater-dependent uses where applicable. The Co-signatories may wish to refer to Appendix F, "Air Quality and Greenhouse Gas Report," Appendix M, "Hydrology and Water Quality Assessment," and Appendix N, "Water Supply Assessment," for additional detail.

Potential changes to the visual environment are evaluated in Section 5.I, "Aesthetics," and Appendix C, "Visual Simulations." The visual simulations depict the proposed facilities in relation to existing conditions

and public viewpoints in the Project vicinity. Based on that Project-specific analysis, the Addendum concludes that, with implementation of the applicable measures addressing screening, construction effects, and transmission infrastructure, the Project would not substantially degrade the existing visual character or quality of public views. The Addendum further concludes that visual impacts would be less than significant and would not be new or substantially more severe than those evaluated in the REGPA PEIR.

The Addendum does not include a separate appraisal or quantitative analysis of effects on individual property values. Section 5.XVI, "Socioeconomics," explains the treatment of economic and social information under CEQA and evaluates the Project's broader socioeconomic effects. The Addendum nevertheless evaluates environmental factors that could bear on community desirability or property values, including visual character, air quality, public health, and groundwater. Based on the analyses and applicable measures discussed above, the Addendum concludes that the evaluated effects would be less than significant and would not be new or substantially more severe than those evaluated in the REGPA PEIR.

Additionally, as you are aware, the Project approval process includes two proposed Renewable Energy Development Agreements (REDAs) between the County, Bonanza Peak, and the applicable property owners. The proposed REDAs would provide a combined $2.5 million in community benefits, including $2 million for a Southern Inyo Fire Protection District firehouse and equipment and $500,000 to support environmental review of the Charleston View Community Plan and local road signs, with any remaining funds from the latter contribution directed to firehouse and equipment maintenance. Although the final terms remain subject to negotiation and County approval, these prospective commitments provide relevant context for considering the Project's overall relationship with the community.

Cumulative Impacts and the Nevada Generation-Tie Line. The February 9 Letter raises concerns regarding the generation-tie line in Nevada and its potential cumulative effects on desert tortoise, rare plants, cultural resources, visual resources, and the Old Spanish National Historic Trail. The Addendum evaluates the Project within the programmatic framework established by the REGPA PEIR and considers the Project's potential contribution to regional or cumulative effects through its resource-specific analyses. These analyses include whether the Project would result in a cumulatively considerable increase in criteria pollutant emissions; effects on special status species, sensitive natural communities, and wildlife movement or connectivity; effects on cultural resources and public views; regional and global greenhouse gas effects; groundwater and water quality effects; and construction and operational transportation effects. The applicable analyses incorporate Project-specific studies and identify measures to avoid, minimize, or mitigate the Project's contribution to the effects evaluated in the REGPA PEIR. The Addendum generally concludes that, with implementation of the applicable measures, the evaluated effects would be less than significant and would not be new or substantially more severe than those evaluated in the REGPA PEIR.

The complete generation-tie line would extend approximately 8.9 miles from the proposed Project substation to the interconnection in Nevada. Approximately 0.42 mile would be located in Inyo County, and the remaining approximately 8.47 miles would be located in Nevada. The Addendum describes the complete generation-tie line to provide Project context but jurisdiction is limited to Inyo County and the State of California. The California segment is included in the Project's resource-specific analyses, including the evaluations of biological, cultural, visual, air-quality, greenhouse-gas, and transportation effects. The Addendum also requires measures applicable to transmission infrastructure, including measures addressing visual contrast, biological resources, cultural resources, and construction effects.

The Nevada portion of the generation-tie line is subject to a separate federal environmental review and authorization process. Bonanza Peak is coordinating with the Bureau of Land Management and other applicable agencies regarding the environmental review, resource studies, and mitigation requirements for that portion of the line. That separate process will address the applicable federal requirements and the

potential biological, cultural, and visual effects of the Nevada segment, including effects associated with desert tortoise habitat and effects in the vicinity of Tecopa Road and the OSNHT. Accordingly, the Addendum's limitation to the California portion does not mean that the Nevada segment is exempt from environmental review; rather, the Nevada segment is being addressed through the separate federal, state, and local processes, as applicable, to that portion of the generation-tie line.

Public Participation and Access to Project Information. The February 9 Letter requests preparation and circulation of a Subsequent EIR, additional opportunities for public participation, and creation of a Project page on the County's website. As stated above, the County independently determines the appropriate form of environmental review and the associated public process. The information below is provided in response to those requests and to give the Co-signatories an updated account of the opportunities for public involvement and access to Project information. Public engagement regarding the Project began before the formal County review process, with outreach letters sent to local residents, property owners, and regional stakeholders beginning in April 2024. Subsequent opportunities have included an October 9, 2024 presentation in Charleston View, an additional presentation on December 3, 2024, a November 4, 2025 Board of Supervisors meeting in Tecopa, a community meeting held later that day in Charleston View in coordination with the Southern Inyo Fire Protection District and representatives of Inyo County, a community open house in Charleston View on July 1, 2026. These outreach activities provided opportunities for community members to receive Project information, ask questions, identify concerns, and provide comments.

Additionally, public input informed the Project and its proposed conditions. In particular, concerns regarding fire safety associated with the originally proposed battery energy storage system (BESS) contributed to its removal from the Project. Concerns regarding construction water use and potential effects on domestic wells also informed development of a proposed voluntary groundwater monitoring program, including monitoring during construction and provisions addressing Project-related changes in groundwater levels. These examples demonstrate that comments received during the review process have been considered as the Project and its proposed conditions have developed.

For the benefit of the Co-signatories, we also note that the County's September 23, 2026 Planning Commission hearing provided an additional opportunity for public input regarding the proposed REDAs and the Project. As reflected in the County's staff report, the Planning Commission was not asked to approve the Project or to make a recommendation regarding approval of the Project or the REDAs. Its role was to conduct the hearing and direct County staff to provide the comments received, or a summary of those comments, to the Board of Supervisors. The Board of Supervisors has sole authority to consider approval of the REDAs and will conduct a separate public hearing when it considers the Project.

In response to the February 9 Letters' request for a dedicated Project page, we further note for the Co-signatories that the County now maintains a dedicated Bonanza Peak Renewable Energy Project webpage (https://www.inyocounty.us/services/planning-department/bonanza-peak-renewable-energy-project) containing the Final Addendum, the Planning Commission staff report, the proposed REDAs, public outreach documentation, and numerous supporting Project materials. A revised non-confidential Cultural Resources Assessment dated September 3, 2026 has also been posted in place of the earlier public report. The Project webpage provides the Co-signatories and other interested members of the public with access to a substantial collection of the information supporting the County's review.

Bonanza Peak supports making Project information reasonably available to the public and will continue to participate in the public hearings and other engagement opportunities established by the County as the review and approval processes proceed.

We hope this response is helpful in addressing the concerns and questions raised in the February 9 Letter and in providing the Co-signatories with updated information regarding the Project, its environmental analysis,

and the opportunities available for continued public engagement. Bonanza Peak appreciates the Co-signatories' engagement, investment in the community and local resources, and the opportunity to provide this additional information. We recognize the importance of the environmental, cultural, and community issues identified in the February 9 Letter and look forward to continuing to work with the County, responsible and trustee agencies, local residents, and other interested parties as the County completes its independent review of the Project.

Sincerely,



Stephanie Lauer
Senior Director, Permitting
Bonanza Peak Solar, LLC

IBEW LOCAL #47

Colin Lavin
Business Manager/
Financial Secretary

Rafael Gomez
President

600 N. Diamond Bar Blvd
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www.ibew47.org

November 4, 2026

Via email: crichards@inyocounty.us; cdraper@inyocounty.us

Inyo County Planning Department
PO Drawer L
Independence, CA 93526
Attention: Cathreen Richards and Cynthia Draper

RE: Bonanza Peak Solar Project

Dear Ms. Richards and Ms. Draper,

On behalf of the International Brotherhood of Electrical Workers (IBEW) Local Union No. 47 and the hardworking men and women we represent, I am pleased to express our strong support for the proposed 500-megawatt Bonanza Peak Solar Project in Charleston View, California.

Our membership recognizes the high-quality jobs that the Project will bring to the region and looks forward to working with the Project sponsors to bring it online. We also recognize the benefits to the broader community provided by solar power to meet regional renewable energy goals and provide lower cost clean energy during the day.

We support an Inyo County staff recommendation for approval by the Inyo County Board of Supervisors of the Project as presented at the following link: Bonanza Peak Renewable Energy Project | Inyo County California. We compliment Inyo County staff for its thorough analysis and look forward to approval of the Project.

Sincerely,

Colin Lavin
Business Manager/Financial Secretary

CL:ma

October 15 , 2026

Inyo County Board of Supervisors
c/o Planning Department
PO Drawer L, Independence, CA 93526

c/o Cathreen Richards
email: crichards@inyocounty.us
Cynthia Draper
email: cdraper@inyocounty.us
RE: Bonanza Peak Solar Project

Dear Supervisors Orrill, Griffiths, Marcellin, Roeser, and Wadelton,

I am Kelly Bradley the president of KEOL Resources International Corporation we are the owners of over 20 Inyo county properties most of them are in Spring Valley Ranchos I am writing to express our support to the Inyo County Board of Supervisors for the proposed 500MW Bonanza Peak Solar development out in Charleston View. We are licensed Real Estate brokers and over the years we have sold over 500 parcels of land out in Charleston View. Almost all of these land buyers still own their lots and are looking forward to some positive developments in the area, Most purchased their lots for a second home away from home and would be in support of Bonanza Peak for the following reasons.

The Bonanza Peak Project could bring some much needed employment and business opportunities to the neighborhood as well as the surrounding region. We understand that the project site land is privately owned and we feel that if the solar project doesn't materialize, some day, in the near future it will be developed into less environmentally friendly project alternative. we believe PV solar is the best fit considering it will conserve more of our scarce resources like water and help preserve wildlife more than a future Vegas style subdivision and industrial complex or 200 plus larger scale farms with their own individual water wells. I believe it will also help preserve the long term quiet rural character of the landscape that makes our place unique . I also appreciate the fact that an equal or greater amount or area of land south of the community will be mitigation land thus taking it out of the market for future development in perpetuity thus conserving even more water and other resources for those who wish to live and build permitted homes here in Charleston View and the surrounding basin on both sides of the state line.

Solar power is also one of the fastest means of increasing our regional energy supply and will help achieve regional long term energy supply goals.

Financially, the project will materially enhance property tax revenue for the area. The proposed community fund that will include assistance with priority projects like the local fire station and community development plan will go along way to create a more stable and safe environment in our neighborhood giving us a little peace of mind and stability so we can plan for the future. IT would also help our customer land owners finally realize there dreams of owning their own off grid micro ranch because of adjusted insurance ratings creating an opportunity to access development capital.

The supporting research and due diligence that was conducted to support the project application as shown at: Bonanza Peak Renewable Energy Project | Inyo County California, demonstrates a commendable job to document that the project is very well conceived and will be implemented accordingly.

Very truly yours,

Kelly Bradley
President KEOL Resources International Corp
2835 Shannon Cove Drive , Henderson NV (702)332-3957 www.buyinyoland.com

JON P. PRECIADO
Business Manager

PETER SANTILLAN
Secretary-Treasurer

SERGIO RASCÓN
President

AFFILIATED LOCALS
SOUTHERN CALIFORNIA

BURBANK
LOCAL 345

HOLLYWOOD
LOCAL 724

LONG BEACH
LOCAL 1309

LOS ANGELES
LOCAL 300

ORANGE COUNTY
LOCAL 652

POMONA
LOCAL 1414

RIVERSIDE AND IMPERIAL COUNTIES
LOCAL 1184

SAN BERNARDINO, INYO, AND MONO COUNTIES
LOCAL 783

SAN DIEGO
LOCAL 89

VENTURA
LOCAL 585

KERN,
SAN LUIS OBISPO, AND
SANTA BARBARA COUNTIES
LOCAL 220

ARIZONA
PHOENIX, AZ
LOCAL 1184

NEW MEXICO
ALBUQUERQUE, NM
LOCAL 16

SOUTHERN CALIFORNIA DISTRICT COUNCIL OF LABORERS
1123 Parkview Dr., Suite 300
Covina, CA 91724
Phone (626) 350-6900
Fax (626) 350-7583
www.scdcl.org

LiUNA! SOUTHERN CALIFORNIA DISTRICT COUNCIL OF LABORERS

Feel the Power

October 14, 2026

Inyo County Planning Department
PO Drawer L, Independence, CA 93526

c/o: Cathreen Richards
email: crichards@inyocounty.us

Cynthia Draper
email: cdraper@inyocounty.us

RE: Bonanza Peak Solar Project

Dear Ms. Richards and Ms. Draper,

On behalf of the over 37,000 members of LIUNA's Southern California District Council of Laborers, I am pleased to submit this letter of support to the Inyo County Board of Supervisors for the 500MW Bonanza Peak Solar Project (the Project) proposed for construction in Charleston View, CA.

Our membership recognizes the high-quality jobs that the Project will bring to the region and looks forward to working with the Project sponsors to bring it on line. We also recognize the benefits to the broader community provided by solar power to meet regional renewable energy goals and provide lower cost clean energy during the day.

We support an Inyo County staff recommendation for approval by the Inyo County Board of Supervisors of the Project as presented at the following link: Bonanza Peak Renewable Energy Project | Inyo County California. We compliment Inyo County staff for its thorough analysis and look forward to approval of the Project.

Very truly yours,

SOUTHERN CALIFORNIA DISTRICT
COUNCIL OF LABORERS

Jon P. Preciado
Business Manager

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:45 PM
To: Cynthia Draper
Subject: FW: Bonanza peak Solar project

From: amber pennington <apennington90@gmail.com>
Sent: Tuesday, October 20, 2026 8:26 AM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza peak Solar project

You don't often get email from apennington90@gmail.com. Learn why this is important

Dear Inyo County,

I am requesting that you review the Bonanza Peak Solar Project with a full Environmental Impact Report as required under the California Environmental Quality Act. Inyo County is claiming that the 2014 Renewable Energy General Plan Amendment has adequately evaluated these impacts, but several details are missing.

The project will impact desert tortoises, burrowing owls, 8 rare plants, mesquite trees,American badgers and other wildlife. The project site is located partly on a crucial desert tortoise connectivity corridor. The analysis states there is no suitable habitat for bighorn sheep on the site, but a bighorn horn was found during the surveys. It could be a good foraging area. The solar project needs to be analyzed in an EIR because the area contains high-ranking state wildlife connectivity corridors as modeled. Yet there is no analysis of maps, closeness of the project to crucial corridors, and any alternatives that would move the project away from corridors or mitigate impacts.

The project will have visual impacts and be located only 1.5 miles from the Old Spanish National Historic Trail. Although the trail is managed by the BLM and National Park Service, neither agency developed the required comprehensive management plan 2 years after the trail was included in the National Trails System in 2002. The addendum reviewing the project simply states that the project would not be visible from the Old Spanish Trail and does not give a detailed review of the impacts. The solar panels, onsite substation and transmission lines will all be visible from the Old Spanish Trail. This will degrade the historic character of the trail viewshed.

The project developers are not sure where they will acquire over 1,000 acre feet of water for dust mitigation during construction and depending on where they get it, could impact severely over-drafted basins in Nevada or California.

The project will be built near and next to private properties. This could impact property values, public health through dust emissions, and quality of life for residents of Charleston View living near the proposed project.

The project will need a 9 mile transmission line which will connect it to theTrout Canyon Substation in Nevada. The transmission line will also impact desert tortoises, other wildlife, rare plants, and the viewshed from the Old Spanish National Historic Trail.

A full paleontological survey should be conducted.

The project will significantly contribute to a large cumulative impact to the South Pahrump Valley, which is being subject to 9 solar projects either built or in the planning process. A better cumulative analysis should be included in an EIR.

Thank you,

Amber Crawford B.S.
+1-702-245-7006

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:42 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar Comment

From: Stephen Denham <stephen.denham@gmail.com>
Sent: Wednesday, October 21, 2026 5:45 PM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar Comment

You don't often get email from stephen.denham@gmail.com. Learn why this is important

Request for Preparation of an Environmental Impact Report: Bonanza Peak Solar Project

This communication formally requests that Inyo County prepare a full Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) for the Bonanza Peak Solar Project. Reliance on the 2014 Renewable Energy General Plan Amendment (REGPA) Addendum is inadequate, as the administrative record fails to evaluate several significant environmental impacts associated with the specific site and project design.

1. Biological Resources and Wildlife Connectivity

The initial review fails to adequately analyze and mitigate impacts to sensitive biological resources:

- **Species Impacts:** The project site supports populations or potential habitat for desert tortoises, burrowing owls, American badgers, eight rare plant species, and mesquite woodlands.
- **Corridor Disruption:** The site is situated within a mapped high-ranking state wildlife connectivity corridor and serves as a crucial desert tortoise linkage. The environmental review lacks detailed mapping, proximity analyses, and evaluation of project alternatives or mitigation measures designed to avoid or minimize severance of these corridors.

- **Desert Bighorn Sheep:** The conclusion that the site lacks suitable habitat for bighorn sheep is contradicted by field findings, including the discovery of a bighorn sheep during surveys, indicating potential utility as a foraging area.

2. Cultural Resources and Visual Impacts

- **Old Spanish National Historic Trail:** The project is located approximately 1.5 miles from the Old Spanish National Historic Trail. The administrative record asserts the project will not be visible from the trail without providing a detailed viewshed analysis. Given the height and industrial nature of the proposed solar arrays, on-site substation, and associated transmission infrastructure, the project will be visible from portions of the trail, resulting in significant degradation of the historic landscape and viewshed.
- **Federal Management Context:** While the trail is jointly managed by the Bureau of Land Management (BLM) and the National Park Service, the absence of a comprehensive management plan does not exempt the lead agency from evaluating direct visual and cultural resource impacts under CEQA.

3. Water Resources

The project proposes to utilize over 1,000 acre-feet of water for construction and dust suppression. The current review defers identification of the water source. Depending on the point of extraction, this demand risks exacerbating severe groundwater overdraft conditions in shared basins across California and Nevada. A quantified water supply assessment and analysis of hydrologic impacts are required.

4. Land Use, Public Health, and Socioeconomics

The project's proximity to private residences in Charleston View presents unmitigated concerns regarding fugitive dust emissions, degradation of regional air quality, potential impacts on local public health, and associated effects on residential property values and quality of life.

5. Inter-State Transmission Infrastructure

The proposed nine-mile transmission line connecting the facility to the Trout Canyon Substation in Nevada represents an integral component of the project. The environmental review must evaluate the direct, indirect, and cumulative impacts of this linear facility on biological resources, wildlife movement, and the Old Spanish National Historic Trail viewshed.

6. Paleontological Resources

The administrative record does not include a comprehensive, site-specific paleontological resource assessment. Given the geological context of the area, a professional survey should be conducted prior to project approval to identify and protect potential fossil resources.

7. Cumulative Impacts

The project is situated within the South Pahrump Valley, an area currently experiencing rapid industrial development with approximately nine solar projects either constructed or in the planning pipeline. The current environmental review lacks a robust cumulative impact analysis addressing the combined regional effects on biological connectivity, visual resources, water supplies, and land use compatibility.

Stephen Denham

8029 Lands End Ave, Las Vegas, NV 89117.

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:42 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar Project Comment

From: Mike Wickersham <mike.wickersham@gmail.com>
Sent: Tuesday, October 20, 2026 7:03 PM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar Project Comment

You don't often get email from mike.wickersham@gmail.com. Learn why this is important

Dear Inyo County Planning Team,

Please register my opposition to the Bonanza Solar Project.

I am requesting that you review the Bonanza Peak Solar Project with a full Environmental Impact Report as required under the California Environmental Quality Act. Inyo County is claiming that the 2014 Renewable Energy General Plan Amendment has adequately evaluated these impacts, but several details are missing.

The project will impact desert tortoises, burrowing owls, 8 rare plants, mesquite trees,American badgers and other wildlife. The project site is located partly on a crucial desert tortoise connectivity corridor. The analysis states there is no suitable habitat for bighorn sheep on the site, but a bighorn horn was found during the surveys. It could be a good foraging area. The solar project needs to be analyzed in an EIR because the area contains high-ranking state wildlife connectivity corridors as modeled. Yet there is no analysis of maps, closeness of the project to crucial corridors, and any alternatives that would move the project away from corridors or mitigate impacts.

The project will have visual impacts and be located only 1.5 miles from the Old Spanish National Historic Trail. Although the trail is managed by the BLM and National Park Service, neither agency developed the required comprehensive management plan 2 years after the trail was included in the National Trails System in 2002. The addendum reviewing the project simply states that the project would not be visible from the Old Spanish Trail and does not give a detailed review of the impacts. The solar panels, onsite substation and transmission lines will all be visible from the Old Spanish Trail. This will degrade the historic character of the trail viewshed.

The project developers are not sure where they will acquire over 1,000 acre feet of water for dust mitigation during construction and depending on where they get it, could impact severely over-drafted basins in Nevada or California.

The project will be built near and next to private properties. This could impact property values, public health through dust emissions, and quality of life for residents of Charleston View living near the proposed project.

The project will need a 9-mile transmission line which will connect it to the Trout Canyon Substation in Nevada. The transmission line will also impact desert tortoises, other wildlife, rare plants, and the viewshed from the Old Spanish National Historic Trail.

A full paleontological survey should also be conducted.

Thank you for your consideration,

Mike Wickersham
(928)-961-4398
mike.wickersham@gmail.com

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:42 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar Comment

From: sandy sandykoppenol.com <sandy@sandykoppenol.com>
Sent: Tuesday, October 20, 2026 6:19 PM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar Comment

You don't often get email from sandy@sandykoppenol.com. Learn why this is important

Dear Inyo County,

I am requesting that you review the Bonanza Peak Solar Project with a full Environmental Impact Report as required under the California Environmental Quality Act. Inyo County is claiming that the 2014 Renewable Energy General Plan Amendment has adequately evaluated these impacts, but several details are missing.

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A full paleontological survey should be conducted.

The project will significantly contribute to a large cumulative impact to the South Pahrump Valley, which is being subject to 9 solar projects either built or in the planning process. A better cumulative analysis should be included in an EIR.

Thank you,

Sandy Koppenol

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:41 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar Comment

From: Cody Dolnick <woland92107@yahoo.com>
Sent: Tuesday, October 20, 2026 6:02 PM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar Comment

You don't often get email from woland92107@yahoo.com. Learn why this is important

Dear Inyo County,

I am requesting that you review the Bonanza Peak Solar Project with a full Environmental Impact Report as required under the California Environmental Quality Act. Inyo County is claiming that the 2014 Renewable Energy General Plan Amendment has adequately evaluated these impacts, but several details are missing.

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Thank you,

Cody Dolnick
PO Box 942,
Joshua Tree, CA
92252

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:41 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar Project Environmental Impact Report

From: MEBurdge <meburdge@icloud.com>
Sent: Thursday, October 22, 2026 6:58 AM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar Project Environmental Impact Report

You don't often get email from meburdge@icloud.com. Learn why this is important

Dear Inyo County,

I am requesting that you review the Bonanza Peak Solar Project with a full Environmental Impact Report as required under the California Environmental Quality Act. Inyo County is claiming that the 2014 Renewable Energy General Plan Amendment has adequately evaluated these impacts, but several details are missing.

The project will impact desert tortoises, burrowing owls, 8 rare plants, mesquite trees,American badgers and other wildlife. The project site is located partly on a crucial desert tortoise connectivity corridor. The analysis states there is no suitable habitat for bighorn sheep on the site, but a bighorn horn was found during the surveys. It could be a good foraging area. The solar project needs to be analyzed in an EIR because the area contains high-ranking state wildlife connectivity corridors as modeled. Yet there is no analysis of maps, closeness of the project to crucial corridors, and any alternatives that would move the project away from corridors or mitigate impacts.

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A full paleontological survey should be conducted.

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Thank you,

Margaret E. Burdge
508 W 6th Street
Claremont, CA 91711
818-421-2988
BurdgeME@icloud.com

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:40 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar

From: Nina Barris <nbarris@sv-mail.com>
Sent: Monday, October 26, 2026 5:48 PM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar

You don't often get email from nbarris@sv-mail.com. Learn why this is important

Hello,

I am reaching out to express my concern about the solar project. You should be aware of the scope of this project; and the magnitude of the impact the Pahrump Valley landscape and animals. This project will save "regular" people money, but at what cost to the environment? At what cost to the natural land that should be left for nature to thrive? Understand the ways this project will exclude habitat such as the Mojave Desert tortoise; unable to pass through the exclusion fence! Think about the burrowing owls and the golden eagles that share the habitat. I am not telling you anything you should not already be aware of. You should already know the impact and environmental destruction this project will have on the animals that live in the Pahrump Valley Solar site. Do not sign off on this project without thinking about their future. What future will you leave behind for future generations? Think about it – destruction of pristine native habitat to animals that have no defense. Let's not lose sight of how nature benefits everyone. The serenity, beauty of open land and open sky is a vehicle for healing our humanity.

Sincerely,

Nina Barris

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:40 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar Comment

From: Eric D. Smith <glixon1966@hotmail.com>
Sent: Monday, October 26, 2026 2:21 PM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar Comment

You don't often get email from glixon1966@hotmail.com. Learn why this is important

Inyo County,

I am requesting that you review the Bonanza Peak Solar Project with a full Environmental Impact Report as required under the California Environmental Quality Act. Inyo County is claiming that the 2014 Renewable Energy General Plan Amendment has adequately evaluated these impacts, but several details are missing.

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A full paleontological survey should be conducted.

The project will significantly contribute to a large cumulative impact to the South Pahrump Valley, which is being subject to 9 solar projects either built or in the planning process. A better cumulative analysis should be included in an EIR.

Thank you,

Eric Smith

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:40 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar Comment

From: Pam Nelson <pamela05n@yahoo.com>
Sent: Monday, October 26, 2026 12:57 PM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar Comment

You don't often get email from pamela05n@yahoo.com. Learn why this is important

Dear Inyo County,

We've traveled through the Pahrump area and have been surprised by its beauty and special habitat.
I am requesting that you review the Bonanza Peak Solar Project with a full Environmental Impact Report as required under the California Environmental Quality Act. Inyo County is claiming that the 2014 Renewable Energy General Plan Amendment has adequately evaluated these impacts, but several details are missing.

The project will impact desert tortoises, burrowing owls, 8 rare plants, mesquite trees, American badgers and other wildlife. The project site is located partly on a crucial desert tortoise connectivity corridor. The analysis states there is no suitable habitat for bighorn sheep on the site, but a bighorn horn was found during the surveys. It could be a good foraging area. The solar project needs to be analyzed in an EIR because the area contains high-ranking state wildlife connectivity corridors as modeled. Yet there is no analysis of maps, closeness of the project to crucial corridors, and any alternatives that would move the project away from corridors or mitigate impacts.

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A full paleontological survey should be conducted.

The project will significantly contribute to a large cumulative impact to the South Pahrump Valley, which is being subject to 9 solar projects either built or in the planning process. A better cumulative analysis should be included in an EIR.

Thank you,
Pam and Greg Nelson
Warner Springs, CA

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:40 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar Comment

From: Max Wilbert <max@maxwilbert.org>
Sent: Thursday, October 22, 2026 10:55 AM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar Comment

You don't often get email from max@maxwilbert.org. Learn why this is important

Comment Letter: Opposing Bonanza Peak Solar Project and Requesting Full Environmental Impact Report

To: Inyo County Planning Department
Email: inyoplanning@inyocounty.us
Subject: Bonanza Peak Solar Comment
Date: October 22, 2026

Dear Inyo County Board of Supervisors and Planning Department:

I am a frequent visitor to Inyo County where I recreate on public lands and visit with friends, and I am writing to formally oppose the proposed Bonanza Peak Solar Project and to request that Inyo County conduct a full Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA), rather than relying on an addendum to the 2014 Renewable Energy General Plan Amendment (REGPA).

My opposition is grounded not merely in human-centric concerns about property values or visual aesthetics, but in a fundamental ethical commitment to the intrinsic value of the Mojave Desert ecosystem and its inhabitants. Nature possesses worth independent of human utility, and this project would cause irreversible harm to a fragile, irreplaceable biome.

The Mojave Desert as an Intrinsically Valuable Ecosystem

The South Pahrump Valley is not an empty space awaiting human development—it is a living landscape with its own integrity, complexity, and right to exist free from industrial transformation. A 2,400-acre solar installation represents more than acreage on a map; it is the destruction of a functioning ecosystem that has evolved over millennia.

Specific Ecological Impacts That Demand Full Scrutiny

Desert Tortoise Habitat and Connectivity Corridors

The project site lies on a crucial desert tortoise connectivity corridor modeled by state wildlife agencies. Desert tortoises are already threatened species, and their survival depends on unfragmented habitat corridors that allow genetic exchange and seasonal migration. Industrial fencing, construction activity, and permanent infrastructure sever these corridors, isolating populations and accelerating decline. The mere presence of desert tortoises documented on-site alone warrants far more rigorous analysis than the current addendum provides.

Rare Plants and Biodiversity

Eight rare plant species, including the Pahrump buckwheat (*Eriogonum bifurcatum*), inhabit this site. These organisms are not replaceable components of an industrial landscape—they represent unique evolutionary lineages adapted to specific microclimates and soil conditions. Their destruction is permanent and cannot be mitigated through offsetting or transplantation.

Burrowing owls, American badgers, golden eagle foraging habitat, and rare milkvetch plants are all identified as affected resources. Each species plays a role in the ecosystem's web of relationships that we do not fully understand and cannot replicate.

Bighorn Sheep Wintering Habitat

The addendum claims there is "no suitable habitat for bighorn sheep on the site," yet a bighorn horn was discovered during surveys. This contradiction reveals inadequate biological assessment. Bighorn sheep are iconic desert inhabitants whose wintering ranges deserve protection, particularly when wildflower blooms may create critical foraging opportunities that current surveys have failed to evaluate.

Cumulative Impacts Are Being Ignored

This project is one of nine solar developments either built or proposed for the South Pahrump Valley region. Each project carves out additional territory from the Mojave Desert, creating cumulative fragmentation that no single-project review can adequately capture. A full EIR is required to assess how these developments collectively transform the landscape, degrade wildlife connectivity, and overwhelm regional ecosystems.

The Yellow Pine Solar Project south of Pahrump, Nevada offers a stark warning: drive-and-crush construction methods destroy fragile desert crusts and ecosystems that take decades to centuries to recover. The Mojave's biological soil crust—a living community of cyanobacteria, lichens, and mosses—anchors soils, retains moisture, and supports plant communities. Once crushed, this crust can take 50+ years to regenerate, if it ever does.

Groundwater Depletion in an Already Over-Allocated Basin

The project requires 1,085 acre-feet of groundwater for dust mitigation during construction. The South Pahrump Valley basin is already over-allocated by approximately 300 percent—roughly 49,000 acre-feet annually. Removing additional groundwater from an overdrafted aquifer exacerbates depletion that affects native vegetation, dependent wildlife, and the long-term hydrological stability of the entire basin. Restoration could take decades even if pumping ceased immediately.

The addendum fails to identify where this water will be sourced. Depending on the source, the project could transfer scarcity to neighboring basins in Nevada or California, displacing impacts rather than resolving them.

Visual and Cultural Impacts Reflect Deeper Disrespect

The project will be visible from the Old Spanish National Historic Trail (located only 1.5 miles away), Mt. Charleston, the Bonanza Peak Wilderness Area, Tecopa Road, the South Pahrump Valley, and the Kingston Wilderness Area. While the addendum dismisses visual concerns with a blanket statement that the project "would not be visible," this contradicts observable reality.

More fundamentally, the degradation of the Old Spanish Trail's viewshed represents disrespect for both cultural heritage and the desert's intrinsic character. A solar farm visible from a national historic trail transforms a landscape of historical and natural significance into an industrial vista. The BLM and National Park Service have not developed the required comprehensive management plan for the trail despite it being added to the National Trails System in 2002—but that failure does not justify further compromising the trail's setting.

The Transmission Line Extends the Footprint

The 8.89-mile generation tie-in line to the Trout Canyon Substation in Nevada extends ecological disruption across Bureau of Land Management lands. This corridor will disturb additional desert tortoise habitat, rare plants, and wildlife movement patterns. Avian collision risks increase with transmission infrastructure. The visual intrusion compounds the cumulative landscape impact.

Why an Addendum Is Insufficient

The county's reliance on a REGPA addendum assumes that the 2014 approval adequately addressed impacts that have since been revealed as inadequate or unknown:

- **No extensive paleontological survey** has been conducted, leaving undiscovered paleontological resources vulnerable to destruction during ground disturbance.
- **Wildlife connectivity mapping** has not been integrated into the analysis, despite the site's location on a high-ranking state corridor.
- **Alternatives analysis is absent**—there is no evaluation of siting the project away from critical habitat or corridors.
- **Cumulative effects are minimized**, ignoring the context of eight other solar projects in the region.

CEQA exists precisely to prevent piecemeal approval of projects with significant environmental consequences. An addendum is appropriate only when no new significant impacts exist or when impacts were previously fully analyzed. Neither condition applies here.

Ethical Consideration: Biocentrism Over Anthropocentrism

Renewable energy development is often framed as inherently beneficial, but this framing centers human needs while treating non-human life as expendable collateral damage. A truly sustainable approach recognizes that:

1. **Nature has intrinsic value** independent of human utility—the Mojave Desert tortoise, the Pahrump buckwheat, and the desert bighorn sheep matter because they exist, not because they serve us.
2. **Energy solutions must not create ecological debt**—we cannot solve one crisis by creating another. Degrading intact desert ecosystems to power consumption patterns does not constitute sustainability.
3. **There are alternatives**—existing disturbed sites, rooftop installations, and less ecologically sensitive locations offer pathways to renewable energy that do not require sacrificing intact wilderness.
4. **Precaution is ethically mandatory** when evidence is incomplete—the contradictions in the biological surveys (desert tortoises found on-site yet inadequate connectivity analysis; bighorn horn discovered yet habitat deemed unsuitable) demand more data, not faster approval.

Conclusion and Request

I urge Inyo County to:

1. **Reject the addendum pathway** and require a full Environmental Impact Report under CEQA for the Bonanza Peak Solar Project.
2. **Conduct comprehensive biological surveys** including paleontological assessment, wildlife connectivity modeling, and evaluation of bighorn sheep habitat suitability.
3. **Require a genuine alternatives analysis** that considers siting options avoiding critical habitat corridors and minimizes cumulative impacts.
4. **Resolve the groundwater sourcing question** with transparency about the source and assessment of impacts on the already-overdrafted basin.
5. **Acknowledge cumulative impacts** from all nine solar projects in the South Pahrump Valley region and consider a regional review rather than fragmented approvals.
6. **Recognize that the desert deserves protection** not merely as a resource for human energy production, but as a living ecosystem with its own right to persist.

Comments are due October 27, 2026. A public hearing will be held on October 27, 2026 at 2 PM at the Tecopa Community Center. I expect Inyo County to honor both the legal requirements of CEQA and the ethical imperative to protect what remains of intact Mojave Desert ecosystem.

Respectfully,

Max Wilbert
206-948-7790
max@maxwilbert.org
PO Box 11262
Eugene, OR 97440

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:39 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar Comment

From: Janie Chapman <vegasflowerchild@gmail.com>
Sent: Monday, October 26, 2026 6:15 PM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar Comment

You don't often get email from vegasflowerchild@gmail.com. Learn why this is important

Dear Inyo County,
I am requesting that you review the Bonanza Peak Solar Project with a full Environmental Impact Report. The project will impact desert tortoises, burrowing owls, rare plants, mesquite trees, American badgers and other wildlife. The project will also surely impact property values and require an extensive amount of water.
Thank you.
Janie Chapman

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 1:28 PM
To: Cynthia Draper
Subject: FW: Bonanza Peak Solar Comment

From: Shea Millan <shea.meara@gmail.com>
Sent: Tuesday, October 27, 2026 9:26 AM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Bonanza Peak Solar Comment

You don't often get email from shea.meara@gmail.com. Learn why this is important

Dear Inyo County,

I am requesting that you review the Bonanza Peak Solar Project with a full Environmental Impact Report as required under the California Environmental Quality Act. Inyo County is claiming that the 2014 Renewable Energy General Plan Amendment has adequately evaluated these impacts, but several details are missing. Thankfully the Basin and Range Watch has brought this to the attention of people who care about this beautiful desert area and would like to see it protected.

The Bonanza Peak Solar project will impact desert tortoises, burrowing owls, 8 rare plants, mesquite trees, American badgers and other wildlife. The project site is located partly on a crucial desert tortoise connectivity corridor. The analysis states there is no suitable habitat for bighorn sheep on the site, but a bighorn horn was found during the surveys. It could be a good foraging area. The solar project needs to be analyzed in an EIR because the area contains high-ranking state wildlife connectivity corridors as modeled. Yet there is no analysis of maps, closeness of the project to crucial corridors, and any alternatives that would move the project away from corridors or mitigate impacts.

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residents of Charleston View living near the proposed project.

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A full paleontological survey should be conducted.

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Thank you,
Shea Millan
Sierra Club Santa Margarita Group Member
shea.meara@gmail.com

Cynthia Draper

From: InyoPlanning
Sent: Wednesday, October 28, 2026 3:44 PM
To: Cynthia Draper
Subject: FW: Killing of the desert tortoises

From: Sharon Minsch <sharon99603@gmail.com>
Sent: Tuesday, October 20, 2026 8:40 AM
To: InyoPlanning <inyoplanning@inyocounty.us>
Subject: Killing of the desert tortoises

You don't often get email from sharon99603@gmail.com. Learn why this is important



Dear Inyo County,

There is still no viable reasonable way to translocate the desert torts. I cannot believe that BLM is allowing such shoddy efforts as seen as bove to move torts. Who

even approved this method??? What about the cumu;ative impacts of all these farms.

Approving all these solar farms separately does not even begin to consider the cumulative impact on our fragile desert. BLM is allowing almost total destruction of our precious desert in the name of money.

Why does it have to be along our scenic byways???

The view scape that so many treasure is being destroyed in the name of money and does not even benefit our area.

Please figure out a better way.

I am requesting that you review the Bonanza Peak Solar Project with a full Environmental Impact Report as required under the California Environmental Quality Act. Inyo County is claiming that the 2014 Renewable Energy General Plan Amendment has adequately evaluated these impacts, but several details are missing.

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The project developers are not sure where they will acquire over 1,000 acre feet of water for dust mitigation during construction and depending on where they get it, could impact severely over-drafted basins in Nevada or California.

The project will be built near and next to private properties. This could impact property values, public health through dust emissions, and quality of life for residents of Charleston View living near the proposed project.

The project will need a 9 mile transmission line which will connect it to theTrout Canyon Substation in Nevada. The transmission line will also impact desert tortoises, other wildlife, rare plants, and the viewshed from the Old Spanish National Historic Trail.

A full paleontological survey should be conducted.

The project will significantly contribute to a large cumulative impact to the South Pahrump Valley, which is being subject to 9 solar projects either built or in the planning process. A better cumulative analysis should be included in an EIR.

Thank you,

--

Sharon Minsch

775-277-1645

Ironworkers Local 433

International Association of Bridge, Structural & Ornamental Iron Workers A.F.L.-C.I.O.
Established 1929

17495 HURLEY STREET EAST CITY OF INDUSTRY, CALIFORNIA 91744

PHONE: (626) 964-2500
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keith@ironworkers433.org

KEITH HARKEY
Business Manager
Financial Secretary-Treasurer

November 4, 2026

Inyo County Planning Department
PO Drawer L, Independence, CA 93526
c/o Cathreen Richards
email: crichards@inyocounty.us
Cynthia Draper
email: cdraper@inyocounty.us

RE: Bonanza Peak Solar Project

Dear Ms. Richards and Ms. Draper,

On behalf of Ironworkers Local 433, I am pleased to submit this letter of support to the Inyo County Board of Supervisors for the 500MW Bonanza Peak Solar Project (the Project) proposed for construction in Charleston View, CA.

Our membership recognizes the high-quality jobs that the Project will bring to the region and looks forward to working with the Project sponsors to bring it online. We also recognize the benefits to the broader community provided by solar power to meet regional renewable energy goals and provide lower cost clean energy during the day.

We support an Inyo County staff recommendation for approval by the Inyo County Board of Supervisors of the Project as presented at the following link: Bonanza Peak Renewable Energy Project Inyo County California. We compliment Inyo County staff for its thorough analysis and look forward to approval of the Project.

Very truly yours,

Keith Harkey
Business Manager / FST

Old Spanish Trail Association
P.O. Box 569, Corrales, NM 87048

October 27, 2026

Inyo County Board of Supervisors
PO Box N
Independence, CA 93526

RE: Request for the Board to reject the Bonanza Peak Solar Project Addendum and Prepare a Subsequent Environmental Impact Report

Dear Members of the Board of Supervisors:

On February 9, 2026, the Old Spanish Trail Association (OSTA), along with other organizations, requested that Inyo County prepare a site-specific Subsequent Environmental Impact Report (SEIR} for the proposed Bonanza Peak Solar Project (Project), rather than rely on an Addendum to the 2015 Final Programmatic Environmental Impact Report {PEIR) for Inyo County's Renewable Energy General Plan Amendment (REGPA) (*see attached letter*).

Now that the Addendum and associated documents have belatedly been available for public review, beginning September 11, 2026, OSTA is convinced more than ever that a Subsequent Environmental Impact Report (SEIR) is needed for the proposed Bonanza Peak Solar Project.

Although CEQA does not require a public hearing for the Addendum, OSTA believes there should be one as soon as possible. Other cities and counties in California have had public hearings before approving Addendums for their previous Environmental Impact Reports, i.e., City of Richmond regarding the environmental review for the HRP Campus Bay Property in 2020.

OSTA also recommends that a Board decision on the Bonanza Peak Solar Project be postponed until after the Thanksgiving, Christmas, and New Years holidays. Because there

has been very little Couty-wide, comprehensive publicity about the Project, most people are probably unaware that such as large project--with known potential for significant impacts-- is being proposed with virtually no site-specific CEQA public review.

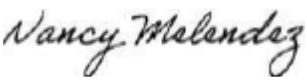
The Old Spanish National Historic Trail was designated by Congress in 2002. The Old Spanish Trail Association (OSTA) is a 501(c)3 organization whose mission is to study, preserve and protect, interpret and educate, and promote respectful use of the Old Spanish Trail (OST), the Old Spanish National Historic Trail (OSNHT), and closely related historic routes. OSTA is a consulting party with BLM for the Old Spanish National Historic Trail, and is one of the volunteer groups which partners with the Bureau of Land Management (BLM) and the National Park Service (NPS) "in planning, developing, maintaining, and managing trails" Section 11(b) of the National Trails System Act (NTSA).

Following further research, OSTA will submit a more detailed comment letter to the Board. One issue that will be thoroughly addressed is the conclusion in Appendix H of the *Addendum*:

> " Given the distance; existing, visually obstructing infrastructure; and lack of anticipated direct disturbance to the OSNHT trail route, the Project is not expected to result in a potential historical resource impact to the OSNHT. This conclusion is consistent with the findings of the Visual Impact Assessment prepared for the Project, which determined that the proposed facilities would not degrade the existing visual character or quality of public views in the Project vicinity (Inyo County & HELIX 2026)" (*Non-Confidential Cultural Resources Assessment*, p. 28, ERM, 10/15/2026).

This conclusion is based on no substantive evidence and contradicts every major analysis of the Old Spanish National Historic Trail Corridor in the Project area vicinity. To cite one example from the *Old Spanish National Historic Trail Comprehensive Administrative Strategy* (CAS), BLM and NPS, Department of the Interior (2017): "The trail corridor is informally considered by the NPS to lie five miles on either side of the centerline of the trail alignment to include the nearest elements of the view shed, parts of the cultural landscapes, landmarks, and traditional cultural properties near the trail" (CAS, p. 5). Thank you very much for your consideration.

Nancy Melendez



President, Old Spanish Trail Association

ATTACHMENT 1

February 9, 2026

Cathreen Richards, Planning Director
Inyo County Planning Department
168 N. Edwards Street
Independence, CA 93526
cc: Board of Supervisors, Planning Commission, Cynthia Draper, Associate Planner

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Richard Waller, President, Old Spanish Trail Association
Lynn Brittner, Executive Director, Old Spanish Trail Association
Jack Prichett, Co-Chair, Stewardship Committee, Old Spanish Trail Association

Jack Prichett

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

Bill Helmer

Kevin Emmerich, Co-Founder
Basin and Range Watch

Laura Cunningham, California Director
Western Watersheds Project

Chandra Rosenthal, Western Lands & Rocky Mountain Advocate
Public Employees for Environmental Responsibility

Shannon Salter, Creative Coordinator
Mojave Green

Steve Bardwell, President
Morongo Basin Conservation Association