

Appendix S

Raven Monitoring, Management, and Control Plan



1277 Treat Blvd
Suite 500
Walnut Creek, CA, 94597

T +1 925 946 0455

erm.com

MEMO

TO	Bonanza Peak Solar, LLC
FROM	Environmental Resources Management, Inc.
DATE	Revised 24 August 2026
REFERENCE	0756349
SUBJECT	Bonanza Peak Energy Project Raven Monitoring, Management, and Control Plan

INTRODUCTION

Environmental Resources Management, Inc. (ERM) has prepared this Raven Monitoring, Management, and Control Plan (Plan) for the Bonanza Peak Energy Project (Project) located in Inyo County, California. ERM has prepared this Plan in accordance with the Inyo County Renewable Energy General Plan Amendment Programmatic Environmental Impact Report Mitigation Measure BIO-6, which states the following:

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

The Plan's objective is to minimize Project-related increases in Common Raven (*Corvus corax*; raven) abundance and associated predation pressure on the Mojave desert tortoise (*Gopherus agassizii*). The Plan describes measures to avoid and minimize raven subsidies and attractants and to monitor and manage raven activity during Project construction and operation. The Plan will be implemented to reduce the potential for raven predation on desert tortoises and other special-status species. As required by Mitigation Measure BIO-6, the Plan will be reviewed and approved by Inyo County, the California Department of Fish and Wildlife (CDFW), and the U.S. Fish and Wildlife Service (USFWS) prior to the initiation of any Project-related ground-disturbing activities.

PROJECT LOCATION

The Project would be located in the Charleston View Solar Energy Development Area in southeastern Inyo County, adjacent to the Nevada state line just north of Old Spanish Trail Highway. An approximately 9-mile-long, 230-kilovolt generation tie-in line would be located on land managed by the Bureau of Land Management in Nye and Clark counties, Nevada. The Project

would connect to the existing Gridliance 230-kilovolt transmission line at the Trout Canyon substation. This Plan only addresses the portion of the Project in California.

The Project Area is bordered by the Pahrump Valley to the northeast; the town of Charleston View, California, 1 mile to the south; the Nopah Range to the west and southwest; and the town of Pahrump, Nevada, 25 miles to the north. The Project would lie within the U.S. Geological Survey Calvada Springs, Mound Spring, and Stump Spring 7.5-minute topographic quadrangles on predominantly flat, arid, sparsely vegetated, open land in the southern portion of the Pahrump Valley.

PROJECT SUMMARY

The Project involves construction, operation and maintenance, and decommissioning of a utility-scale, solar photovoltaic energy-generating facility on private lands. The solar generation facility, including the photovoltaic arrays, substation, and other electrical equipment, would be within a 3,382-acre Project Area. Consistent with the Inyo County Renewable Energy General Plan Amendment, the developed area of the solar facility within California would not exceed 2,400 acres. The Project has a planned net generating capacity of up to 500 megawatts alternating current and would be built as one or more phases. Activities would include vegetation clearing, grading (where necessary), pile driving, trenching, equipment installation, and facility construction.

Construction is anticipated to occur over approximately 18 months, beginning in April 2027. The duration of the Project is expected to be up to 50 years.

RAVEN MONITORING, MANAGEMENT, AND CONTROL MEASURES

Conditions associated with the Project that might provide raven subsidies or attractants include standing or leaked water, anthropogenic food sources and trash, roadkill or other carcasses, and structures that provide perching, roosting, or nesting opportunities. The management practices and control measures listed below will be implemented during the Project to avoid or minimize conditions and subsidies that could increase raven abundance and predatory activities.

Water

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

Anthropogenic Food Sources and Trash

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

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

Carcasses

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

Sites for Nesting, Roosting, and Perching

All buildings, fences, generation-tie line infrastructure, and other vertical structures associated with the Project will be designed utilizing Best Management Practices intended to minimize nesting, perching, and roosting per current standards and practices, including applicable and appropriate Avian Powerline Interaction Committee guidelines (Avian Powerline Interaction Committee 2006, 2012). Perch and nest deterrents will be installed where necessary and appropriate to discourage use by ravens.

Inactive Nest Removal

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

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

Raven Monitoring

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

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

- If raven monitoring indicates an increase in local raven activity attributed to the Project, further measures shall be implemented in coordination with USFWS and CDFW to deter ravens from the Project site. Measures include actions such as additional worker education, more stringent restrictions on water use or trash disposal, additional installation of nest or perch deterrents on Project infrastructure, nest removal, specific measures to “haze” ravens from Project infrastructure or subsidies, or lethal removal in coordination with USFWS and CDFW.
- Because the Project is likely to attract common ravens over its active life, Bonanza Peak Solar, LLC will provide funds to the Renewable Energy Action Team (REAT) account established with the National Fish and Wildlife Foundation (NFWF) to support implementation of a regional common raven management and monitoring program. The contribution will be provided as a one-time payment based on the approved disturbance acreage at a rate of \$105 per acre.
- Results of raven monitoring and any implemented management or adaptive measures will be documented and incorporated into annual reporting prepared for the Project’s USFWS and CDFW Incidental Take Permits, as applicable.