

Appendix U

Desert Kit Fox and American Badger Management Plan



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Bonanza Peak Energy Project

PREPARED FOR
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Desert Kit Fox and American Badger Management Plan

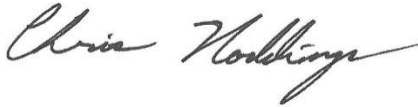
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ACRONYMS AND ABBREVIATIONS

Acronym	Description
CDFW	California Department of Fish and Wildlife
CDV	Canine distemper virus
ERM	Environmental Resources Management, Inc.
gen-tie	Generation tie-in line
GIS	Geographic Information System
GPS	Global Positioning System
O&M	Operations and maintenance
Plan	Management Plan
PV	Photovoltaic
REGPA	Renewable Energy General Plan Amendment

1. INTRODUCTION

Environmental Resources Management, Inc. (ERM) has prepared this Desert Kit Fox and American Badger Management Plan (Plan) on behalf of Bonanza Peak Solar, LLC, for the Bonanza Peak Energy Project (Project) located in Inyo County, California. The Project consists of the construction, operations and maintenance (O&M), and decommissioning of a utility-scale solar photovoltaic (PV) energy-generating facility on private lands in southeastern Inyo County, California. The purpose of this Plan is to provide a framework for avoiding and minimizing Project-related impacts to desert kit fox (*Vulpes macrotis arsipus*) and American badger (*Taxidea taxus*).

This Plan provides the measures that will be implemented to avoid, minimize, and mitigate potential adverse effects that may occur to desert kit foxes and American badgers within the Project Area during Project construction, O&M, and decommissioning.

ERM prepared this Plan in accordance with the Inyo County Renewable Energy General Plan Amendment (REGPA) Final Programmatic Environmental Impact Report (Inyo County 2015) Mitigation Monitoring and Reporting Program requirements. The relevant measure addressed in this Plan, Mitigation Measure BIO-17, states:

"The project proponent shall prepare and implement an American badger and/or kit fox management plan. The plan shall be prepared in accordance with the most current CDFW guidelines for these species. The plan shall be approved by CDFW prior to implementation. The plan shall include the following components:

- *Preconstruction surveys and mapping efforts: biological monitors shall perform pre-construction surveys for badger and kit fox dens in the project area, including areas within 250 feet of all project facilities, utility corridors, and access roads. If dens are detected, each den shall be classified as inactive, potentially active, or definitely active, including characterization of den type for kit fox (natal, pupping, likely satellite, atypical) per CDFW guidance, and mapped along with major project design elements.*
- *Inactive dens that would be directly impacted by construction activities shall be excavated by hand and backfilled to prevent reuse by badgers or kit fox. Excavation and filling activities shall be performed by a CDFW-approved biologist. Potentially and confirmed active dens shall not be disturbed during the whelping/pupping season (February 1 to September 30).*
- *Monitoring requirements. Potentially and definitely active dens that would be directly impacted by construction activities shall be monitored by the CDFW-approved biologist for three consecutive nights (during weather conditions favorable for detection) using a tracking medium (such as diatomaceous earth or fire clay) and/or infrared camera stations at the entrance. If no tracks are observed in the tracking medium or no photos of the target species are captured after three nights, the den shall be excavated and backfilled by hand. If tracks are observed, the den shall be progressively blocked with natural materials (rocks, dirt, sticks, and vegetation piled in front of the entrance) for the next three to five nights to discourage the badger or kit fox from continued use. After verification that the den is unoccupied, it shall then be excavated and backfilled by hand to ensure that no badgers or kit fox are trapped in the den.*

- *Passive relocation strategies. The management plan shall contain, at a minimum, several strategies to passively relocate animals from the site. These methods may entail strategic mowing, fencing, or other feasible construction methods to assist in moving animals offsite toward desirable land. The plan shall address the location of preferred offsite movement of animals, based on CDFW data and land ownership. Even with permission from the landowner, private land is to be avoided to the maximum extent practicable.*
- *Escape dens shall be installed along the perimeter fencing to reduce predation risk.*
- *Kit fox disease prevention measures. The CDFW-approved biologist shall notify the County project manager and CDFW within 24 hours if a dead kit fox is found or appears sick. The plan must also detail a response to a kit fox injury, including a necropsy plan, reporting methods, and scope of adaptive methods in the event of a known or suspected outbreak. The project owner will pay for any necropsy work."*

2. REGULATORY STATUS AND PROTECTIONS

The desert kit fox is not listed under the federal Endangered Species Act or the California Endangered Species Act and is not designated by the California Department of Fish and Wildlife (CDFW) as a mammalian Species of Special Concern. However, the species is protected under Title 14 of the California Code of Regulations (CCR), Section 460, which provides that "fisher, marten, river otter, desert kit fox, and red fox may not be taken at any time." Under California Fish and Game Code Section 86, "take" means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.

The American badger is designated by CDFW as a mammalian Species of Special Concern. The species is also subject to hunting and trapping regulations under Title 14 CCR Section 461, which provides that badger may be taken only from November 16 through the last day of February statewide.

3. PROJECT DESCRIPTION

3.1 PROJECT LOCATION

The proposed Project would be 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 gen-tie would extend from the Project Area into Nevada, where it would be located on Bureau of Land Management-administered lands in Nye and Clark counties, Nevada. The Project would connect to the existing GridLiance 230-kilovolt transmission system at the Trout Canyon substation in Clark County, Nevada (**Appendix A, Figure 1**). This Plan only addresses the portion of the Project in California. The Project is located in CDFW Region 6 – Inland Deserts Region.

The Project Area is situated between the Pahrump Valley to the northeast; the town of Pahrump, Nevada, 25 miles to the north; the town of Charleston View, California, approximately 1 mile to the south; the Nopah Range to the west and southwest; Tecopa, California, approximately 26 miles to the west; and Mountain Springs, Nevada, approximately 25 miles to the east. The Project would lie within the United States Geographical Survey Calvada Springs, Stump Spring, and Mound Spring 7.5-minute topographic quadrangles on predominantly flat, arid, sparsely vegetated, open land in the southern portion of the Pahrump Valley. A map of the Project vicinity is included in **Appendix A, Figure 2**.

3.2 PROJECT OVERVIEW

The Project involves the construction, operation, and decommissioning of a utility-scale, solar PV energy-generating facility on private lands. The solar generation facility, including the PV arrays, substation, and other electrical equipment, would be developed within a 3,382-acre Project Area. Consistent with the *Inyo County General Plan – Renewable Energy General Plan Amendment* (REGPA; Inyo County 2015), 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 will be built as one or more phases. Construction activities will include vegetation clearing, grading (where necessary), pile driving, trenching, equipment installation, and facility construction. A map of the Project Area depicting Project components is included in **Appendix A, Figure 1**.

Construction is anticipated to occur over approximately 18 months, scheduled to be initiated in April 2027. The duration of the Project operation is anticipated to be 50 years.

4. BASELINE CONDITIONS

Elevations within the Project Area range from 2,500 to 2,600 feet above mean sea level. At the Pahrump National Oceanic and Atmospheric Administration weather station (approximately 25 miles north of the Project), average annual temperatures range from 16 to 111 degrees Fahrenheit and annual precipitation averages 4.81 inches (National Weather Service 2024). Existing conditions, including a general description of the plant communities and biological resources in the Project Area, are summarized in the following subsections.

4.1 VEGETATION AND LAND COVER

The Project Area and surrounding landscape support Mojave Desert scrub habitat characterized by creosote bush (*Larrea tridentata*), white bursage (*Ambrosia dumosa*), shadscale (*Atriplex confertifolia*), and associated desert shrub communities. Based on the Manual of California Vegetation, the most abundant alliances occurring within the Project Area are the Shadscale Scrub (*Atriplex confertifolia* Shrubland Alliance, 912.2 acres) and Creosote Bush – White Bursage Scrub (*Larrea tridentata* – *Ambrosia dumosa* Shrubland Alliance, 617.5 acres) (CNPS 2025; Stantec 2025a, 2025b). Together, these two alliances account for more than half of the Project Area (1,529.7 of 2,708.4 acres surveyed). Shadscale scrub is most dominant in the western portion of the Project Area, while Creosote Bush – White Bursage Scrub is most dominant in the eastern portion. Desert Globemallow Herbaceous Scrub [*Sphaeralcea (ambigua, coccinea, parvifolia)* Herbaceous Alliance] is dominant in the herbaceous layer (195.7 of 278.1 acres) and is generally found around the central portion of the Project Area (Stantec 2025a, Stantec 2025b).

The vegetation communities support a high number of non-native and invasive species such as saltlover (*Halogeton glomeratus*), Russian thistle (*Salsola tragus*), and other non-native grasses and forbs; cheatgrass (*Bromus tectorum*) was also dominant during past surveys (Stantec 2025a).

Existing disturbed areas within the Project Area include dirt roads. Other anthropogenic impacts include off-highway vehicle tracks, trash, and evidence of historical cattle grazing in the area (Stantec 2025a).

5. DESERT KIT FOX

5.1 BIOLOGY AND LIFE HISTORY

The desert kit fox is a semi-fossorial nocturnal mammal that occupies arid regions across the southern half of California in the Mojave and Colorado deserts. The desert kit fox is one of two subspecies of kit fox found in California, the other being the federally endangered and state threatened San Joaquin kit fox (*Vulpes macrotis mutica*), which occupies the San Joaquin Valley floor and foothills of the Central Valley (CDFW 2000).

Desert kit fox prefers sparsely vegetated habitats including desert scrub and annual grasslands, with a predisposition for creosote bush scrub communities in California. They dig dens in areas with loose soil and minimal vegetation cover. They generally occupy several dens within their range. Dens can have a single entrance or multiple openings in a complex system. Characteristic desert kit fox dens typically have a “keyhole” shaped entrance (meaning the den entrance height is taller than the width) and are approximately 5 to 8 inches in diameter (Kadaba et al. 2013; United States Fish and Wildlife Service 2011).

As kit foxes are primarily carnivorous, they rely on abundant rodent populations. They also do not require a regular source of water, as they derive most of the moisture they need to survive from their prey (CDFW 2000).

The breeding season for desert kit fox begins in the fall. From September to October, females begin visiting, clearing, and preparing natal dens in anticipation of the upcoming pupping/whelping season. Desert kit foxes typically give birth in February or March, following a mating season from December through February. The pupping/whelping lasts from 1 February through 30 September (Kadaba et al. 2013).

Threats to the desert kit fox include predation by coyotes, collisions with vehicles due to urbanization and industrial development in desert communities, and diseases such as canine distemper virus (CDV) (Kadaba et al 2013).

5.2 EXISTING PROJECT DATA

The Project is located within the documented geographical range of the desert kit fox, which spans the Mojave and Colorado deserts in California. The Project Area provides suitable habitat for this species, as it includes desert scrub communities such as the *Larrea tridentata* – *Ambrosia dumosa* Shrubland Alliance (creosote bush – white bursage scrub) (Stantec 2025a).

Desert tortoise surveys conducted in 2020 and 2024, along with burrowing owl surveys in 2025, recorded incidental evidence of desert kit fox within the Project Area. Observed sign included live individuals, potential dens, carcasses, scat, and tracks (Stantec 2025a). During these surveys, 447 desert kit fox sign observations were recorded. These occurrences are distributed throughout the Project Area, with most concentrated on the northwestern and northeastern edges of the Project Area.

6. AMERICAN BADGER

6.1 BIOLOGY AND LIFE HISTORY

The American badger is a semi-fossorial diurnal and nocturnal mammal that can be found throughout the state of California (Zeiner et al. 1988–1990). American badgers prefer dry, open areas within shrub, forest, and herbaceous communities. They require friable soils to dig their burrows. Characteristic dens are typically 10 to 12 inches in diameter, have a “D” shaped entrance, horizontal claw marks on the sides, and have fan-shaped soil piles near the entrance. (Harrison 2015; Zeiner et al. 1988–1990).

American badgers are carnivorous, they eat several species of fossorial rodents including rats, mice, chipmunks ground squirrels, and pocket gophers. They may also eat reptiles, insects, earthworms, eggs, birds, and even carrion (Zeiner et al. 1988–1990).

American badgers mate in the summer and early fall. American badger kits are generally born in the early spring (typically in March and April) after a delayed implantation period. They disperse in the fall post-weaning, where they leave to establish their own territories (Badger Research Program n.d.).

Threats to American badgers include habitat loss, collisions with vehicles associated with urbanization and industrial development of natural communities, and diseases such as CDV. Due to the aggressive nature of American badgers, they do not have many natural predators and have been known to hunt in tandem with coyotes (CDFW 2019).

6.2 EXISTING PROJECT DATA

The Project is located within the documented geographical range of the American badger, which spans almost all of California. The Project Area provides suitable habitat for this species, as it includes desert scrub communities with loose soils and dry open areas (Stantec 2025a).

Desert tortoise surveys conducted in 2020 recorded incidental evidence of American badger within the Project Area. Observed sign included dens, scat, and tracks (Stantec 2025a). During this survey, 323 American badger sign observations were recorded. These occurrences are distributed throughout the Project Area, with the highest concentration of observations extending from the northeastern corner to the center of the Project Area.

7. PROTECTION MEASURES

The following protection measures will be implemented for desert kit fox and American badger throughout all phases of the Project to ensure compliance with the procedures and protocols required by the Inyo County REGPA Programmatic Environmental Impact Report Mitigation Monitoring and Reporting Program, in addition to the recommended CDFW guidelines regarding this species.

7.1 AVOIDANCE AND MINIMIZATION MEASURES

To minimize potential impacts to desert kit fox and American badger, the following measures will be implemented by Bonanza Peak Solar, LLC and/or their contractor:

- A full-time biological monitor will be onsite during exclusion fence installation, initial ground-disturbing activities, and for all ground-disturbing activities outside the exclusion fence, on any individual development phase. An adequate number of biological monitors will be present to monitor all aspects of the activities that have the potential to injure or kill special-status wildlife. After the exclusion fence is installed and the work area inside the fence is cleared of special-status wildlife, biological monitoring inside the fenced work area will be reduced to regular spot checks. The biological monitor has the authority to stop work in the area if a special-status species enters the work area and will use discretion in determining whether the individual will be monitored or relocated. Work will only resume when the biological monitor notifies the contractor that work is safe to resume.
- Bonanza Peak Solar and/or their contractor will clearly delineate the Project Area boundaries with fencing, stakes, or flags before construction activities begin on any individual development phase. All construction will be restricted to the fenced, staked, or flagged areas. The Bonanza Peak Solar and/or their contractor will maintain all fencing, stakes, and flags until the completion of construction on any individual development phase.
- The CDFW-approved biologist will give Worker Environmental Awareness Training to all Project personnel. The training program will address special-status species (including desert kit fox) and sensitive habitats that may occur within Project work areas, protection afforded to these species and habitats, penalties for non-compliance, notification procedure if species is encountered or observed sick, injured or deceased during Project activities, and avoidance and minimization measures required to avoid and/or minimize impacts from the Project. The contractor will be responsible for ensuring that all new Project personnel receive training prior to beginning work on the Project. A log will be maintained to document all personnel who received training.
- Personnel and visitors will use only designated access routes, established public roads, staging areas, and parking areas when traveling to, from, and within the Project Area. Use of cross-country vehicles and equipment is prohibited outside of approved designated work areas to prevent unnecessary ground and vegetation disturbance.
- Vehicles will not exceed 15 miles per hour in the Project Area and will abide by posted speed limits on paved roads.

- All personnel and visitors will carpool, when possible, when traveling in special-status species habitat.
- Construction and operation-related noise levels will be minimized, to the extent feasible, to reduce impacts to wildlife.
- Bonanza Peak Solar, LLC and/or their contractor will design, install, and maintain motion-activated, downward-pointing, full-cutoff facility lighting to direct light downwards towards the Project Area and avoid light spillover to wildlife habitat.
- All persons, while on Project property, will be prohibited from feeding wildlife, bringing domestic pets to the Project Area, collecting native plants, or harassing wildlife.
- The contractor will prevent wildlife entry and entrapment by any of the following:
 - Installing wildlife escape ramps in any excavation with steep walls that would inhibit wildlife escape.
 - Capping all vertical pipes.
 - Inspecting open trenches or other excavations, by a designated biologist, immediately before backfilling, excavation, or other earthwork.
- Bonanza Peak Solar, LLC and/or their contractors will maintain all construction vehicles and equipment in proper working condition to minimize the potential for fugitive emissions of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials.
- Bonanza Peak Solar, LLC and/or their contractors will inform the biological monitor of any hazardous spills immediately.
- Bonanza Peak Solar, LLC and/or their contractors will immediately stop work and clean up any fuel or hazardous material spills using proper containment and disposal methods. Bonanza Peak Solar, LLC and/or their contractors will dispose of contaminated soil at a licensed facility.
- Bonanza Peak Solar, LLC and/or their contractors will conduct refueling and maintenance at designated areas only. Bonanza Peak Solar, LLC and/or their contractors will keep spill response kits (e.g., absorbent pads and buckets) onsite at all times.
- Bonanza Peak Solar, LLC and/or their contractors will not use erosion control materials potentially harmful to wildlife, such as monofilament netting (erosion control matting) or similar material.
- If necessary, Bonanza Peak Solar, LLC will only apply non-toxic soil bonding and weighting agents on unpaved surfaces. Anticoagulants will not be used for rodent control. Pre-emergents and other herbicides with documented residual toxicity will not be used. Bonanza Peak Solar, LLC will engage a licensed contractor to apply herbicides in conformance with federal, state, and local laws and according to the guidelines for wildlife-safe use of herbicides (see the Habitat Restoration, Revegetation, and Weed Management Plan).
- Project personnel will dispose of trash and food-related items in self-closing, sealable containers with latching lids to prevent wind and wildlife from opening containers. All trash must be removed from the Project Area and taken to an appropriate disposal location at least weekly.

- If the application of water is needed to abate dust in construction areas and on dirt roads, Bonanza Peak Solar, LLC and/or their contractors will keep the amount of water used to the minimum amount needed to avoid attracting wildlife to the work area. Contractors will not allow water used for construction activities to form puddles where water cannot infiltrate and will not evaporate within the same day.
- Bonanza Peak Solar, LLC and/or their contractors would revegetate temporary disturbance areas in accordance with the Habitat Restoration, Revegetation, and Weed Management Plan (ERM 2026).

7.2 DEN EVALUATION AND OCCUPANCY DETERMINATION

Prior to construction, all desert kit fox and American badger dens identified within the Project Area during baseline surveys will be evaluated by a CDFW-approved biologist with demonstrated experience in the identification and ecology of desert kit fox and American badger. The purpose of the den evaluation is to determine den occupancy status, identify dens requiring avoidance or exclusion, and develop appropriate protection measures before ground-disturbing activities begin.

Where occupancy cannot be determined through visual inspection alone, the biologist may use remote wildlife cameras, track stations, repeated site visits, or other methods approved by CDFW to document den use. Den evaluations will be conducted during the period when desert kit fox and American badger are actively using dens, but prior to the pupping season when young are born and reared, generally between October and December. Conducting den evaluations during this period allows occupancy to be accurately assessed and, where appropriate, exclusion measures to be implemented before natal or pupping dens are established.

All identified dens will be classified as inactive, potentially active, or confirmed active, and further characterized by den type if applicable (natal, pupping, or atypical) in accordance with CDFW guidance. All potential dens will be mapped using a global positioning system (GPS) and mapped relative to Project design features. The CDFW-approved biologist conducting the den evaluation will maintain detailed spatial data of the den observations within the Project Area.

7.3 DEN EXCLUSION

Following den evaluation and classification, appropriate avoidance, monitoring, exclusion, or protection measures will be implemented based on den occupancy status, den type, seasonal considerations, and the potential for Project-related impacts. Exclusion activities will only be conducted under the supervision of a CDFW-approved biologist and in accordance with applicable CDFW guidance.

A natal/pupping den refers to any single den or den complex that is used by desert kit fox to whelp and/or raise their pups and/or American badger to give birth and or raise their young. An atypical den refers to any man-made structure that is a suitable size for desert kit fox or American badger to occupy. This may include pipes, culverts, and diggings underneath buildings and/or stacked materials.

Table 1 includes methods to address inactive, potentially or confirmed active, and natal/pupping dens observed within the Project Area.

TABLE 1 DEN CLASSIFICATION AND METHODS TO ADDRESS

Den Class	Desert Kit Fox Description	American Badger Description	Methods
Inactive	A den that is a suitable size (5 to 8 inches in diameter, may or may not have the characteristic “keyhole” shaped entrance) but is evidently not in use—a substantial quantity of debris has collected along the entrance, it is filled in with soil, you can clearly see the back of the den, and/or there is undisturbed annual plant growth along the runway and entrance.	A den that is a suitable size and shape (10 to 12 inches in diameter and has a “D” shaped entrance) but is evidently not in use—a substantial quantity of debris has collected along the entrance, it is filled in with soil, you can clearly see the back of the den, and/or there is undisturbed annual plant growth along the runway and entrance.	1. Excavate by hand and backfill to prevent reoccupation under the supervision of a CDFW-approved biologist.
Potentially or Confirmed Active	A den that is a suitable size but lacks the indicators of inactivity (described above). Desert kit fox diagnostic sign including scat, fur, tracks, or prey remains may or may not be present. May include atypical dens such as pipes, culverts, and diggings underneath buildings and/or stacked materials.	A den that is a suitable size and shape but lacks the indicators of inactivity (described above). American badger diagnostic sign including horizontal claw marks on the side of the den, scat, fur, tracks, or prey remains may or may not be present. May include atypical dens, which refers to any man-made structure that is a suitable size for American badger to occupy.	1. Monitor den for 3 consecutive nights under the supervision of a CDFW-approved biologist, during weather conditions suitable for detection. a. Monitoring shall be conducted using a tracking medium (e.g., diatomaceous earth or fire clay) and/or infrared camera stations placed at den entrances. 2. If no tracks are detected and no photographic evidence of the species is recorded after the monitoring period, then a fiberoptic scope shall be used to confirm that the den is unoccupied and the den shall be excavated and backfilled by hand. 3. If evidence of occupancy is observed and outside the breeding/whelping/pupping season (1 February through 30 September), proceed as follows: a. Den entrance shall be progressively blocked with natural materials (e.g., rocks, soil, sticks, or vegetation) over a period of 3 to 5 nights to discourage continued use.

Den Class	Desert Kit Fox Description	American Badger Description	Methods
			b. Once the biologist verifies that the den is unoccupied, it shall be excavated and backfilled by hand to ensure that no individuals are trapped. c. If the den remains occupied, repeat the passive hazing and monitoring until the den can be confirmed vacant. d. If the den remains occupied after repeated attempts of passive hazing, coordinate with CDFW to determine how to proceed. 4. If evidence of occupancy is observed during the breeding/whelping/pupping season, the den shall not be disturbed.
Natal/Pupping	A natal/pupping den is any single den or den complex that is used by desert kit fox to whelp and/or raise their pups. A natal den refers to the den that is used to whelp pups, while a pupping den is used to rear the pups after they have been whelped. These may or may not be the same den, and they are often hard to distinguish from another. These dens may be larger and with more entrances (as in a complex) than a single fox would usually occupy. Diagnostic sign may include a higher volume of tracks, scat, and prey remains within the vicinity of the den and have a broader apron of matted soil with one or more entrances.	A natal den is any single den or den complex that is used by American badger to give birth to and/or raise their kits. These dens may be larger and with more entrances (as in a complex) than a single badger would usually occupy. Diagnostic sign may include fur near the entrance, higher volume of tracks, and a broader apron of matted soil. Scat and prey remains may or may not be present, in addition to scat from other species (e.g. coyote or desert kit fox). It may be difficult to distinguish a regular den from a natal den. Confirmed presence of kits is the only reliable way to differentiate a den used for foraging or shelter from a natal den.	1. If a natal/pupping den is observed outside of the breeding/whelping/pupping season (1 February through 30 September), proceed as follows: a. Monitor den for 3 consecutive nights under the supervision of a CDFW-approved biologist, during weather conditions suitable for detection. i. Monitoring shall be conducted using a tracking medium (e.g., diatomaceous earth or fire clay) and/or infrared camera stations placed at den entrances. b. If no tracks are detected and no photographic evidence of the species is recorded after the monitoring period, the den shall be excavated and backfilled by hand. c. If evidence of occupancy is observed: i. Den entrance shall be progressively blocked with natural materials (e.g., rocks,

Den Class	Desert Kit Fox Description	American Badger Description	Methods
			soil, sticks, or vegetation) over a period of 3 to 5 nights to discourage continued use. ii. Once the biologist verifies that the den is unoccupied, it shall be excavated and backfilled by hand to ensure that no individuals are trapped. iii. If the den remains occupied, repeat the passive hazing and monitoring until the den can be confirmed vacant. 2. If an active natal/pupping den is observed during the breeding/whelping/pupping season, proceed as follows: a. CDFW shall be notified of any active natal/pupping dens within 24 hours to determine the appropriate method to minimize the potential for harm or mortality. i. The appropriate method is dependent on the age of the pups, the location of the den within the Project Area (perimeter vs center), the status of the perimeter fencing (complete or not), and any construction activities planned near the den. b. A 500-foot no disturbance buffer shall be installed and maintained around all active natal/pupping dens. c. A strip of vegetation at least 100 feet wide shall not be mowed up to the perimeter fence to provide cover and a gap will be created in the exclusion fence to allow egress and ingress. d. The den shall be monitored by non-invasive techniques (e.g., wildlife

Den Class	Desert Kit Fox Description	American Badger Description	Methods
			cameras) until the den is confirmed vacant. e. If the situation is unusual and not addressed by this Plan, the CDFW-approved biologist will consult with CDFW to determine the appropriate method to minimize the potential for harm or mortality.

7.4 PASSIVE RELOCATION TECHNIQUES

Relocation techniques to relocate desert kit foxes or American badger from the Project Area to suitable offsite habitat discussed in this Plan only include passive methods intended to discourage occupancy of the Project Area. Passive relocation refers to the indirect displacement of a species, in which individuals are not physically captured, trapped, or handled, but are instead encouraged to relocate themselves through non-invasive methods. Passive relocation allows animals to leave an area voluntarily without direct human contact. Suitable undeveloped offsite desert scrub habitat is present northwest of the Project Area.

To facilitate passive relocation and maintain habitat connectivity, a strip of native vegetation at least 100 feet wide will be retained adjacent to the Project perimeter fence where feasible to provide cover for desert kit fox movement. In addition, gaps will be incorporated into the chain-link perimeter fence above the desert tortoise exclusion fence to allow desert kit fox to leave and re-enter the Project Area while maintaining the effectiveness of desert tortoise exclusion measures. These measures are intended to provide movement corridors and refuge opportunities for desert kit fox during construction and in the event active dens are avoided or excluded from the Project Area.

Table 1 provides techniques to address potential dens within the Project Area depending on their class (inactive, potentially/confirmed active, and natal/pupping). Any potential desert kit fox or American badger den found during the breeding, whelping, and pupping season that is confirmed to be active will not be relocated and will be avoided until it is confirmed the young have left. A 500-foot no disturbance buffer will be maintained around all active natal/pupping dens within the Project Area unless otherwise approved by CDFW.

7.4.1 DISCOURAGING DEN USE

By making dens and burrows located within the Project Area less attractive for continued occupancy, desert kit foxes and American badgers may be encouraged to relocate to suitable habitat outside of active work areas prior to construction.

Common practices to discourage den use include:

- **Hazing and Burrow Collapse**— Progressively blocking the entrance of a den or burrow with natural materials (e.g., rocks, sticks, and vegetation) over a period of time to discourage continued use. Once confirmed vacant through monitoring by a qualified biologist, the den or burrow may be excavated by hand outside the breeding/whelping/pupping season and backfilled to prevent reoccupation.
- **One-Way Door and Burrow Collapse**— Installation of a one-way door or similar device at the entrance to a den or burrow that allows animals to exit but prevents re-entry. Once confirmed vacant through monitoring by a qualified biologist, the den or burrow may be excavated by hand and backfilled to prevent reoccupation.

7.4.1.1 OTHER TECHNIQUES

Any other techniques must be approved by CDFW prior to implementation.

7.4.2 DESERT KIT FOX ESCAPE DENS

Excavation and collapse of potential desert kit fox dens within the Project Area may temporarily increase predation risk by reducing available cover and refuge opportunities. To minimize this risk, artificial escape dens may be installed along perimeter fencing or in other appropriate locations to provide shelter opportunities for displaced desert kit foxes. These escape dens would function as predator-avoidance refugia and help minimize the potential for injury or mortality during and after passive relocation activities.

Escape dens are typically made of a polyvinyl chloride or high-density polyethylene pipe that is 3 to 6 meters in length and 20 centimeters in diameter. The pipe is then placed on the surface of the ground and covered with 1 to 2 meters of soil (Bjurlin et al. 2005).

7.5 DISEASE PREVENTION

To reduce the transmission of canine distemper virus (CDV) and other wildlife diseases by Project personnel, the following measures will be implemented:

- No pets will be allowed onsite prior to or during any phase of construction, maintenance, operation, and decommissioning. Pets shall not be left in vehicles within Project parking areas. In accordance with the Americans with Disabilities Act, service animals will be allowed onsite.
- If CDV is detected within or within the immediate vicinity of the Project Area, all den monitoring will follow a disinfecting protocol including the following:
 - Disinfecting and/or covering footwear prior to visiting potential desert kit fox [or American badger] dens.
 - Disinfecting any equipment that may come in contact with desert kit fox [or American badger] including, but not limited to, wildlife cameras, one-way doors, and monitoring equipment.
 - Wearing single-use disposable gloves while performing any den inspections

If a sick or deceased desert kit fox [or American badger] is observed within the Project Area, CDFW will be notified as described in Section 8.2 of this Plan. Any additional measures recommended by CDFW will be implemented.

7.6 PRE-CONSTRUCTION SURVEY AND MONITORING

To avoid construction-related impacts to desert kit fox and American badger, a CDFW-approved biologist, who has the knowledge and experience with the biology and identification of desert kit fox and American badger, will conduct a pre-construction survey for desert kit fox and American badger dens no more than 14 days prior to the start of any ground-disturbance or vegetation-removal activities. Surveys will include 100 percent visual coverage of the entire Project Area plus a 250-foot buffer surrounding all Project facilities, utility corridors, and access roads. Surveyors will use transects sufficient to provide 100 percent visual coverage of the survey area.

The purpose of the pre-construction survey is to verify current site conditions immediately before construction, confirm the status of previously identified dens, verify the effectiveness of any completed exclusion measures, and identify any new dens or signs of desert kit fox or American badger activity that may have developed since the initial den evaluation.

The biologist will inspect all previously documented dens and any newly discovered dens and document evidence of current occupancy, including tracks, scat, prey remains, fresh excavations, or direct wildlife observations. If new active dens are identified, or if previously excluded dens show evidence of renewed occupancy, appropriate avoidance, monitoring, or additional exclusion measures consistent with **Table 1** will be implemented prior to the start of construction activities.

8. REPORTING AND NOTIFICATION

Detailed spatial data containing the locations of potential dens will be maintained, as needed, on a Geographic Information System (GIS) platform.

If the Project implements security cameras along the perimeter of the Project, it is recommended that these cameras are checked periodically for the presence of desert kit fox and/or American badger in the vicinity over the life of the Project, especially since desert kit fox have been known to re-enter solar development sites both during and after construction phases (Poessel et. al 2026).

The following instances require notification to the County Project Manager and/or CDFW:

- If an active natal/pupping den is observed within the Project Area, CDFW will be notified within 24 hours to determine the appropriate method to minimize the potential for harm or mortality.
- If an injured, sick, or deceased desert fox and/or American badger is observed within the Project Area, CDFW and the County Project Manager will be notified within 24 hours of the incident and/or observation. A Wildlife Incident Report will be prepared and reviewed by a CDFW-approved biologist.
 - If a desert kit fox and/or American badger is found injured/sick due to Project-related activities, the CDFW-approved biological monitor will consult with CDFW personnel to determine the best course of action regarding capturing, handling, and transport of the animal to a CDFW-approved veterinarian clinic.
 - If a deceased desert kit fox and/or American badger is found within the Project Area (whether due to Project-related activities or is incidentally found), the CDFW-approved

biological monitor shall immediately protect the carcass from scavengers and notify the Bonanza Peak Solar, LLC, who will notify CDFW personnel and CDFW's Wildlife Health Laboratory.

- Handling and storing of the animal will follow guidelines described in CDFW's Wildlife Health Laboratory's *Protocols for Safe Handling and Disposal of Carcasses* (CDFW n.d.). CDFW consultation will provide recommendations regarding next steps, including whether a necropsy or disease investigation is warranted. Bonanza Peak Solar, LLC will coordinate with CDFW regarding any recommended investigations and associated responsibilities.

Contact information is detailed below.

CDFW Region 6—Inland Deserts Region Contact:

Magdalena Rodriguez, Senior Environmental Scientist Supervisor

Address: 36202 Inland Empire Blvd. Suite C-220, Ontario, CA 91764

Phone: 909-844-2520

Email: Magdalena.Rodriguez@wildlife.ca.gov

CDFW Wildlife Health Laboratory Contact:

Address: 1701 Nimbus Road Suite D, Rancho Cordova, CA 95670

Phone: 916-358-2790

Email: WILAB@wildlife.ca.gov

Inyo County Project Manager Contact:

Cathreen Richards—Inyo County Planning Director

168 N. Edwards Street, Independence, CA 93526

Phone: 760-878-0447

Email: crichards@inyocounty.us

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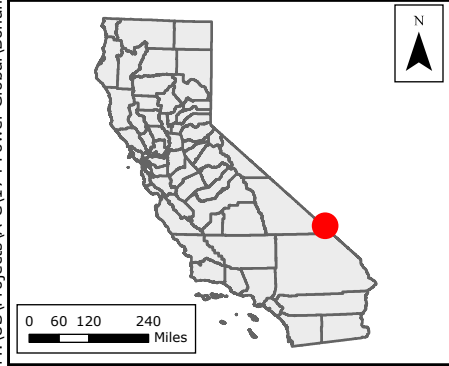
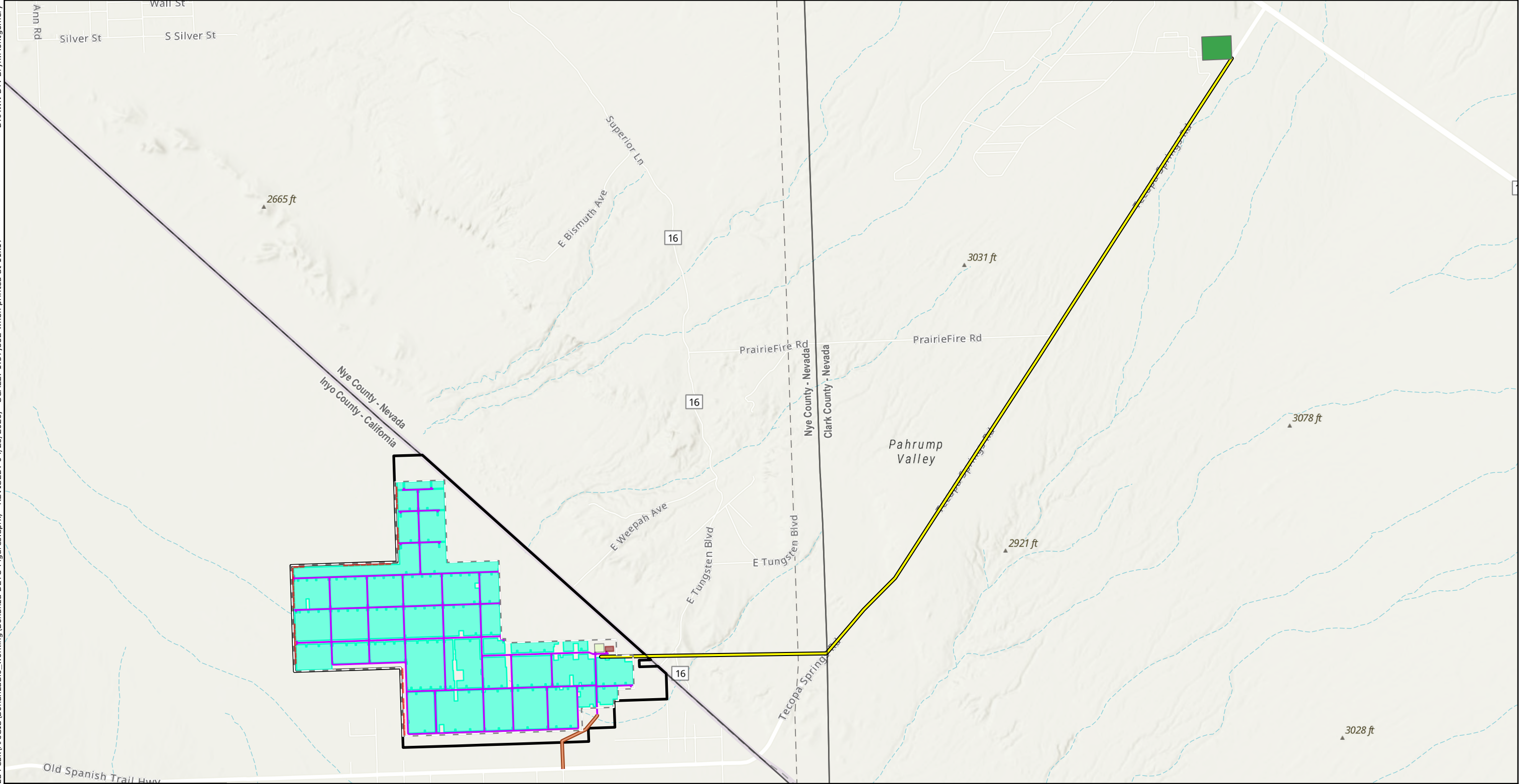
APPENDIX A FIGURES

FIGURE 1 - PROJECT COMPONENTS

FIGURE 2 - PROJECT VICINITY

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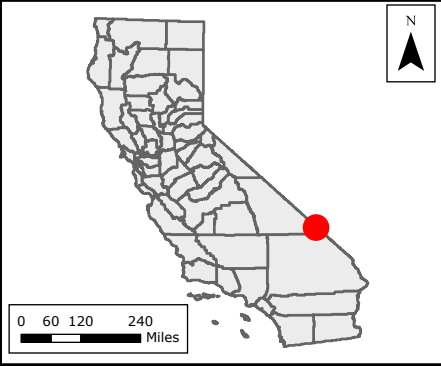
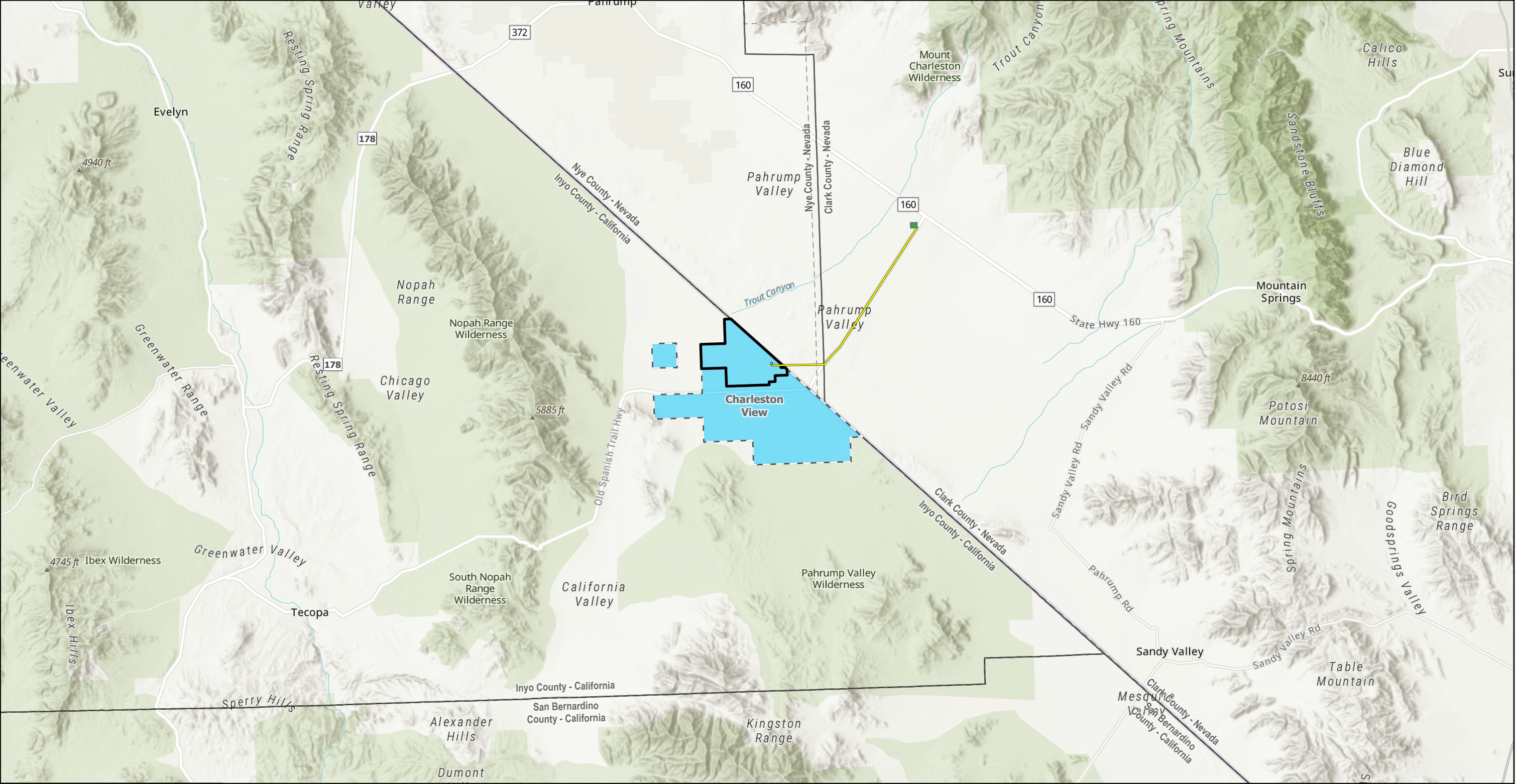
Legend

Site Access Route	O&M Building
Gen-tie Alignment	Solar Array
Project Area	Perimeter Fencing
Project Substation	Retention Basins
Trout Canyon Substation	Internal Access Roads

0 1 2
Miles

Figure 1
Project Components
Bonanza Peak Energy Project
Bonanza Peak Solar, LLC
Calvada Springs, CA

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- Legend**
- Gen-tie Alignment
 - Project Substation
 - Trout Canyon Substation
 - Project Area
 - Charleston View Solar Energy Development Area

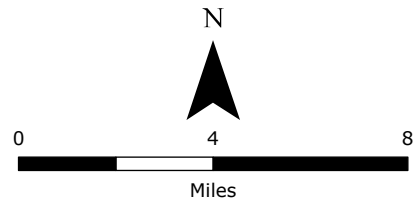


Figure 2
Project Vicinity
Bonanza Peak Energy Project
Bonanza Peak Solar, LLC
Calvada Springs, CA





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COUNTRIES AND TERRITORIES WORLDWIDE

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China	Romania
Colombia	Singapore
France	South Africa
Germany	South Korea
Guyana	Spain
Hong Kong	Switzerland
India	Taiwan
Indonesia	Thailand
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