

Appendix V

Bonanza Peak Energy Project Mitigation Summary

MEMO

TO	Cynthia Draper and Cathreen Richards, Inyo County
FROM	Sarah Willbrand
DATE	15 October 2026
REFERENCE	0838701
SUBJECT	Bonanza Peak Energy Project Mitigation Summary

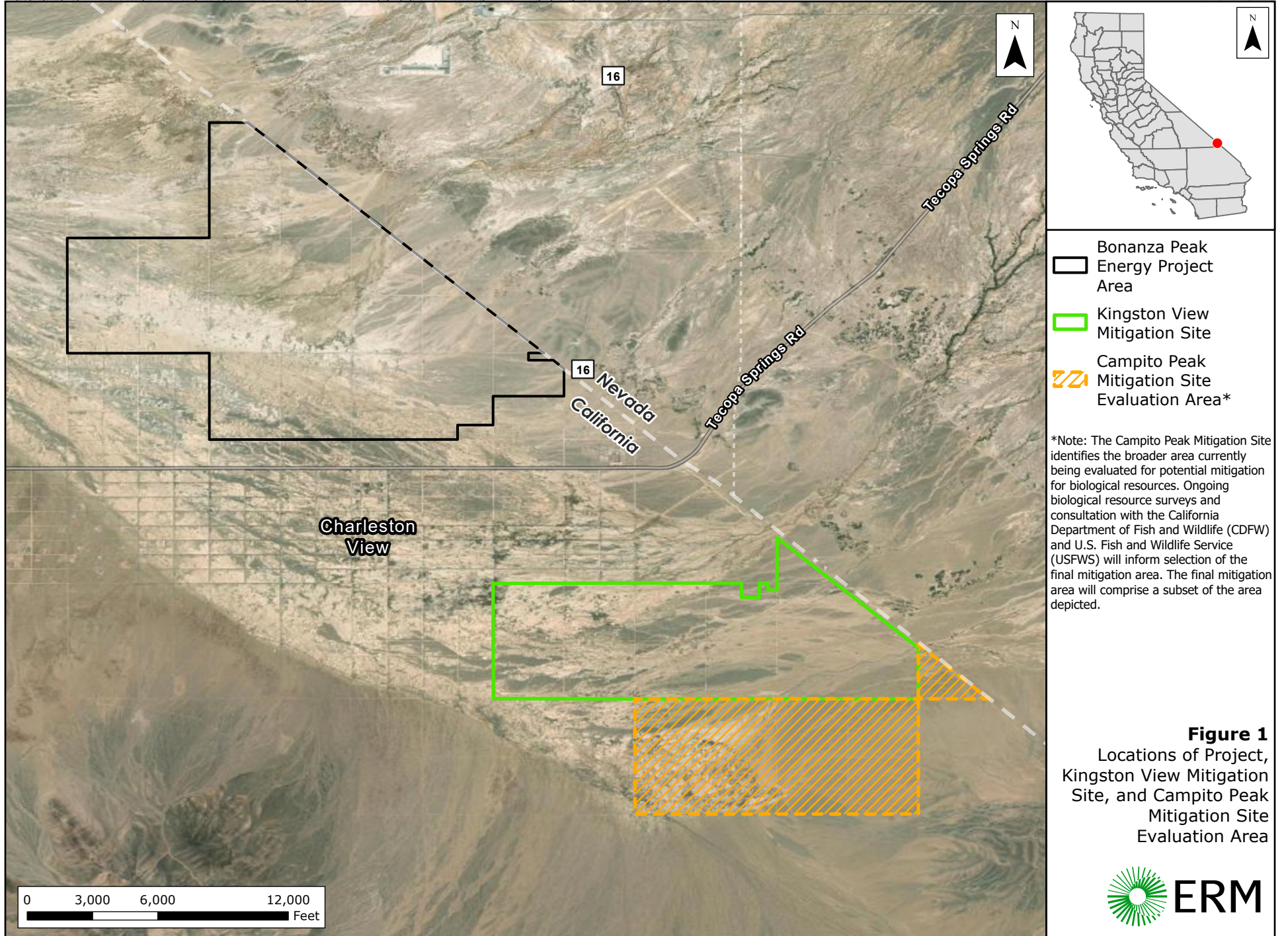
1. INTRODUCTION

Bonanza Peak Solar, LLC, a subsidiary of Hanwha Renewables, (Applicant) has worked closely with Inyo County, the California Department of Fish and Wildlife (CDFW), and the U.S. Fish and Wildlife Service (USFWS) throughout project planning to avoid, minimize, and mitigate impacts to special-status species and protected water features as a result of the Bonanza Peak Energy Project (Project). This memorandum summarizes the process of determining appropriate mitigation for the Project and also provides a summary of the status of the plans that the Applicant has prepared in coordination with the CDFW and USFWS (agencies).

2. MITIGATION FOR SPECIAL-STATUS SPECIES AND SENSITIVE RESOURCES

The approximately 2,400-acre Project area (**Figure 1**) supports waters of the State, the federally and state-listed desert tortoise (*Gopherus agassizii*), the state candidate species burrowing owl (*Athene cunicularia*), the state candidate species LeConte's thrasher (*Toxostoma lecontei*), and eight special-status plants¹ that are either protected under the California Desert Native Plants Act or that have California Rare Plant Ranks. The Applicant has coordinated with Inyo County regarding the implementation of the biological mitigation measures described in the Renewable Energy General Plan Amendment (REGPA) Final Environmental Impact Report (EIR); the CDFW to obtain an Incidental Take Permit under the California Endangered Species Act; and the USFWS to obtain an Incidental Take Permit under the federal Endangered Species Act.

¹ Mojave yucca (*Yucca schidigera*), silver cholla (*Cylindropuntia echinocarpa*), pencil cholla (*Cylindropuntia ramosissima*), beavertail cactus (*Opuntia basilaris* var. *basilaris*), Torrey's ephedra (*Ephedra torreyana*), Preuss' milk-vetch (*Astragalus preussii* var. *preussii*), Tidestrom's milk-vetch (*Astragalus tidestromii*), and honey mesquite (*Neltuma odorata*)



As detailed in **Attachment A**, the original Project design included development within the area now proposed as part of the Kingston View mitigation site. Kingston View is 1,859 acres and is located approximately 2 miles southeast of the Project Area (**Figure 1**), within the same regional desert tortoise recovery landscape and ecological setting. Biological surveys documented high-quality habitat, live desert tortoises at above-average densities, numerous suitable burrowing owl burrows, and numerous ephemeral drainages and watercourses/active floodplains. Based on these findings, the Applicant concluded that development would result in unavoidable impacts to valuable habitat and sensitive resources and therefore relocated the Project to an alternative site (the current Project location), preserving Kingston View for mitigation.

Subsequent surveys show that Kingston View also supports habitat suitable for LeConte's thrasher and contains native plant communities that support the special-status plant species present in the Project area. Permanent conservation of these habitats will protect native desert ecosystems and the species that depend on them.

Through coordination with the agencies during the permitting process, which included a review of the biological resources studies prepared for Kingston View, the required mitigation acreage was determined using agency-approved methodologies that considered habitat type, habitat quality, and species occurrence. These methodologies resulted in a mitigation package sufficient to compensate for the approximately 2,400 acres of Project impacts and to satisfy the mitigation requirements established by CDFW and USFWS. Because Kingston View only comprises 1,859 acres and 2,400 acres of suitable mitigation land were required, the Applicant has identified a property to the immediate south of Kingston View, called Campito Peak (**Figure 1**),² which is currently under option for the Applicant to lease or buy. The Applicant is continuing to coordinate with the agencies and is currently conducting biological surveys on this approximately 2,000-acre site to determine which approximately 600 acres would provide the greatest ecological value (based in part on habitat quality, contiguity, and regional connectivity) for the special-status species and aquatic resources to be mitigated. The final Kingston View and Campito Peak mitigation properties will provide contiguous high-quality habitat that will be preserved and maintained in perpetuity to offset Project impacts. The Applicant is ahead of the typical project mitigation timeline, having already identified and secured mitigation lands, which are generally obtained later in the permitting process.

In addition to preserving these mitigation sites, the Applicant will implement agency-required avoidance and minimization measures during construction and operation. These measures include pre-construction surveys, biological monitoring, worker environmental awareness training, species-specific protection measures, and compliance with all applicable permit conditions, as outlined in the Project's biological studies and permit documents.

² In Figure 1, the larger Campito Peak area under consideration is labeled as the "Campito Peak Mitigation Site Evaluation Area." However, only approximately 600 acres of this area will be used as the final Campito Peak mitigation site.

3. BIOLOGICAL RESOURCES PLANS REQUIRED BY THE REGPA FEIR

The Applicant is preparing and implementing the biological resources plans listed in **Table 1** to comply with the REGPA EIR and to support applications for incidental take from the CDFW and USFWS. Additional plans addressing non-biological resource areas are being developed as well.

TABLE 1. PLANS PREPARED BY THE APPLICANT TO BE IMPLEMENTED FOR THE PROJECT

Plan Name	REGPA EIR Mitigation Measure(s) Requiring Plan	Responsible Agency	Status
Desert Kit Fox and American Badger Management Plan	BIO-17	Inyo County	Complete (incl. agency approval)
Avian and Bat Protection Plan	BIO-3, BIO-8, BIO-9, BIO-12, BIO-18	Inyo County, CDFW, USWS	Addressing agency comments
Raven Management Plan	BIO-6	Inyo County USFWS, CDFW	Complete (incl. agency approval)
Desert Tortoise Translocation Plan	BIO-6	Inyo County USFWS, CDFW	Addressed agency comments; waiting for final agency approval
Habitat Restoration, Revegetation, and Weed Management Plan	AG-3, BIO-3, BIO-22, and CUL-1	Inyo County USFWS, CDFW	Complete (incl. agency approval)
Preliminary Reclamation Plan	BIO-3, CUL-1	Inyo County	Complete (incl. agency approval)
Special-Status Plant Mitigation and Monitoring Plan	BIO-2	Inyo County	In preparation

4. CONCLUSIONS

Through Project redesign, impact avoidance, implementation of mitigation measures, and permanent conservation of the Kingston View and Campito Peak mitigation sites, the Applicant has taken extensive steps to satisfy the mitigation requirements established by CDFW, USFWS, and Inyo County. Since identifying and securing mitigation lands is generally done later in the permitting process, the Applicant is ahead of the typical project mitigation timeline. The Applicant remains committed to implementing all required mitigation measures, permit conditions, and management plans necessary to protect biological resources and ensure long-term environmental stewardship.

ATTACHMENT A MITIGATION SITE SELECTION MEMORANDUM



Mitigation Site Selection Memorandum

Bonanza Peak Energy Project

PREPARED FOR
Bonanza Peak Solar, LLC

DATE
2 June 2026

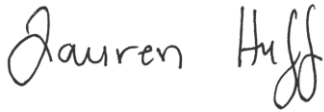
REFERENCE
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Mitigation Site Selection Memorandum

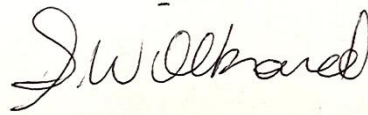
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ACRONYMS AND ABBREVIATIONS

Acronym	Description
AMM	avoidance and minimization measure
Applicant	Bonanza Peak Solar, LLC
CDFW	California Department of Fish and Wildlife
ERM	Environmental Resources Management, Inc.
MCV	<i>Manual of California Vegetation</i>
Project	Bonanza Peak Energy Project
USFWS	United States Fish and Wildlife Service

1. INTRODUCTION

Bonanza Peak Solar, LLC (Applicant) proposes the Bonanza Peak Energy Project (Project) in Inyo County, California (**Appendix A, Figure 1**). The Applicant refined the Project through an iterative process informed by multi-year biological and aquatic resources surveys. These surveys improved the Applicant's understanding of the presence, distribution, and habitat quality for sensitive wildlife species and jurisdictional aquatic features within the Project region, including the federally and state-listed desert tortoise (*Gopherus agassizii*), the state candidate burrowing owl (*Athene cunicularia*), and waters of the State.

Early survey results identified high-quality desert tortoise habitat and a relatively high concentration of desert tortoise sign, as well as the presence of numerous jurisdictional aquatic features within portions of the initially proposed Project footprint. In response, the Applicant redesigned and relocated the Project to avoid these sensitive biological and aquatic resources to the extent practicable. Additional biological surveys also evaluated the suitability of the Project Area for burrowing owl use, including the presence and density of potential burrows and the surrounding open habitat conditions that support foraging and nesting behavior. Aquatic resources delineations and field assessments also characterized the extent, function, and condition of jurisdictional features.

This document provides the basis for the Applicant's proposed desert tortoise, burrowing owl, and waters of the State mitigation strategy. Specifically, it describes:

- How desert tortoise survey results directly informed Project siting and resulted in the selection of a separate mitigation property originally considered for development.
- The substantially higher habitat quality and desert tortoise density present at the mitigation site relative to the Project Area, as well as habitat features indicative of high suitability for burrowing owl use, including abundant burrow availability and intact open desert conditions.
- The presence of a substantial number of aquatic features at the mitigation site, including waters of the State, that are similar to, and in some cases in better condition than, those identified within the Project Area.
- The suite of avoidance and minimization measures (AMMs) that will be implemented in the Project Area to further reduce impacts desert tortoise, burrowing owl and jurisdictional aquatic features, including pre-construction surveys, biological and environmental compliance monitoring, and resource-specific protective measures.

Together, these factors support a mitigation and impact minimization approach that is biologically meaningful, reduces potential effects to waters of the State, and contributes to the long-term conservation of high-quality habitat for listed species. This approach is consistent with applicable state and federal resource agency guidance and preserves habitat and hydrologic features that support ecological function and long-term landscape suitability.

2. BACKGROUND

The initial Project design evaluated development within what is now proposed as the Kingston View property (mitigation site; **Appendix A, Figure 2**), formerly known as Calvada Springs. Desert tortoise surveys conducted in this area documented highly suitable habitat, abundant desert tortoise sign, and live tortoises (Allied Pacific Partners 2023), with an estimated density substantially higher than the average density reported for the Eastern Mojave Desert Tortoise Recovery Unit; additional information is provided in Section 4.2. Surveys also identified numerous burrowing owl burrows and extensive open desert habitat suitable for burrowing owl occupation, indicating comparatively high overall habitat quality for sensitive desert species. In addition, aquatic resource surveys documented numerous aquatic features at the mitigation site, including ephemeral drainages and watercourses/active floodplains, supporting its suitability for mitigation of Project impacts to waters of the State.

Based on these findings, the Applicant determined that development at this location would result in unavoidable impacts to high-value desert tortoise habitat and, accordingly, shifted the Project to an alternate location. Subsequent surveys within the revised Project Area (defined further in Section 3) demonstrated that desert tortoise use was present but generally lower in density and more spatially constrained, occurring primarily along the eastern portion of the Project Area footprint. In response, the Applicant further refined Project siting to avoid these higher-use areas to the extent practicable.

The current Project design is shown in **Appendix A, Figure 3**. The current Project location, described in Section 3 and shown in **Appendix A, Figure 4**, reflects how design refinements avoid the highest documented concentrations of desert tortoise habitat and sign in the Project Area, while reserving the higher-quality mitigation site property for long-term conservation and mitigation.

3. PROJECT AREA DESCRIPTION

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 Area lies 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.

Elevations within the Project Area range from 2,560 feet to 2,660 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).

3.1 VEGETATION AND LAND COVER

The most abundant *Manual of California Vegetation* alliances within the Project Area are Shadscale Scrub (*Atriplex confertifolia* Shrubland Alliance, 912.2 acres) and Creosote Bush – White Bursage Scrub (*Larrea tridentata* – *Ambrosia dumosa* Shrubland Alliance, 617.5 acres); together, these two alliances account for more than half of the Project Area (1,529.7 acres 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 acres of 278.1 acres) and is generally found around the central portion of the Project Area. The western two-thirds of the Project Area is also interspersed with areas of low vegetative cover dominated by noxious weeds such as cheatgrass (*Bromus tectorum*) and saltlover (*Halogeton glomeratus*) (Stantec 2025a).

Existing development and disturbed areas within the Project Area include dirt roads and abandoned buildings (Stantec 2025). Other anthropogenic impacts include off-highway vehicle tracks, trash, and evidence of historical cattle grazing in the area (Ironwood 2021; Stantec 2024).

3.2 DESERT TORTOISE IN THE PROJECT AREA

Desert tortoise presence within the Project Area has been evaluated through multiple protocol-level surveys conducted between 2020 and 2025. The results demonstrate that, while desert tortoises are present within the regional landscape, the current Project Area supports relatively low densities of tortoises when compared to documented recovery unit averages and nearby higher-quality habitat. These findings are consistent with the Project's location in a transitional portion of the Pahrump Valley characterized by existing disturbance, invasive species presence, and lower habitat suitability relative to adjacent conservation lands. The following subsections summarize the results of desert tortoise surveys conducted within the Project Area.

Table 1 summarizes the desert tortoise survey results for the Project. **Appendix A, Figure 4** depicts the desert tortoise survey results.

3.2.1 2020 SURVEY

In 2020, one live desert tortoise was identified along Stateline Road, which follows the California/Nevada border. Four *Class 1 Active condition* burrows were identified; these burrows were associated with a live desert tortoise or recent desert tortoise sign. There were 12 *Class 2 Good condition* burrows, which had no sign of recent use, but were intact and free of vegetation and debris. Finally, there were two *Class 3 Deteriorated condition* burrows, which were partially or wholly collapsed. Four desert tortoise carcasses (Class 5) were also identified during the survey, estimated at more than 4 years old, where bones were disarticulated and scattered. Nine other records of sign, including scat, track/dig marks, and pallets (an aboveground, temporary tortoise shelter), were also recorded. The estimated density in the survey area was 0.1 tortoise per square kilometer (km^2), lower than the 1.5 tortoises/ km^2 average density in the Eastern Mojave Desert Tortoise Recovery Unit (U.S. Fish and Wildlife Service [USFWS] 2011).

3.2.2 2024 SURVEY

In 2024, two live desert tortoises, both observed in burrows, were identified in the desert scrub habitat within the eastern one-third of the approximately 580-acre survey area. Two additional burrows were also recorded. One burrow appeared to be inactive and the other had signs of being active (e.g., with freshly dug soil). These burrows were most likely associated with the two live tortoises found, given that each was located near one of the occupied burrows and was the same size as the occupied burrows. In addition, surveyors discovered one tortoise pallet that appeared to be actively used and tortoise scat near the burrows. The estimated density in the survey area was 1.6 tortoises/ km^2 , higher than the 1.5 tortoises/ km^2 average density in the Eastern Mojave Desert Tortoise Recovery Unit (USFWS 2011).

3.2.3 2025 SURVEY

No live desert tortoises were observed in the approximately 1,487-acre survey area during the 2025 surveys; however, 24 burrows and one pallet were observed. The estimated density in the survey area was 0 tortoises/ km^2 , lower than the 1.5 tortoises/ km^2 average density in the Eastern Mojave Desert Tortoise Recovery Unit (USFWS 2011).

TABLE 1 SUMMARY OF DESERT TORTOISE SURVEY RESULTS

Survey	Survey Area (acres)	Number of Individuals Observed	Occupied/ Active Burrows (Class 1)	Unoccupied/ Inactive Burrows (Class 2-3)	Total Number of Observed Sign*	Estimated Density (per km^2)
October 2020 (Ironwood 2021)	3,100	1	4	14	31	0.1
May 2024 (Stantec 2024)	580.6	2	3**	1	3	1.6
June 2025 (Allied Pacific)	1,487	0	0	16	25	0

Survey	Survey Area (acres)	Number of Individuals Observed	Occupied/ Active Burrows (Class 1)	Unoccupied/ Inactive Burrows (Class 2-3)	Total Number of Observed Sign*	Estimated Density (per km²)
Partners 2025)						
Eastern Mojave Desert Tortoise Recovery Unit (USFWS 2011)						1.5

Notes:

* Includes observations of burrows and other sign including carcasses, scat, tortoise tracks, and pellets.

** Two of the active tortoise burrows were most likely associated with the observed individuals.

km² = square kilometer

3.3 BURROWING OWL IN THE PROJECT AREA

Incidental sightings of burrowing owl and burrowing owl sign in the Project Area were documented during the desert tortoise surveys described in Section 3.2. In addition, breeding-season burrowing owl surveys were completed between March and June 2025 in accordance with California Department of Fish and Wildlife (CDFW) guidance (CDFW 2012). The following subsections summarize the burrowing owl observed within the Project Area. **Table 2** summarizes the burrowing owl observations for the Project. **Appendix A, Figure 5** depicts the burrowing owl survey results.

3.3.1 INCIDENTAL OBSERVATIONS

Burrowing owls and their sign were observed during the desert tortoise surveys conducted for the Project as follows:

- 2020 survey: Abundant burrowing owl sign (e.g., burrows, pellets, whitewash, tracks) was identified in the Project Area (Ironwood 2021). In addition, two live individuals were observed in the Project Area.
- 2024 survey: One live individual near a burrow complex was observed in the far western part of the Project Area (Stantec 2024).

3.3.2 2025 SURVEYS

Four burrowing owls (two living burrowing owls and two carcasses) were detected during the breeding-season surveys, but no pairs or breeding activity were observed. Two burrowing owl individuals were observed in or near the Project Area (Stantec 2025b). In March, one was observed flying from an active burrow complex in the western portion of the Project Area. In April, the other was observed near a documented burrow complex just south of the Project Area. In addition, two burrowing owl carcasses were observed in the Project Area. In March, one carcass was observed and was suspected to be the live burrowing owl that had been killed by a prairie falcon (*Falco mexicanus*), a known predator of small birds including the burrowing owl. The other carcass was observed in the central portion of the Project Area.

Numerous potential burrowing owl burrows, as well as burrowing owl sign in the form of whitewash, feathers, pellets, or bones, were also observed within the survey area. A total of 83 unoccupied burrows were documented throughout the Project Area.

As frequent foraging and overall movement was not observed, there were likely no brooding females or young to feed in the territory. However, the presence of territorial burrowing owls, potential burrows, and prey base indicates that breeding could occur during subsequent seasons.

TABLE 2. SUMMARY OF BURROWING OWL SURVEY RESULTS

Survey	Survey Area (Acres)	Number of Live Individuals Observed	Occupied/ Active Burrows	Unoccupied/ Inactive Burrows
October 2020 (Ironwood 2021)	3,100	2	Not collected	Not collected
May 2024 (Stantec 2024)	580.6	1	1 ¹	Not collected
March, April 2025 (Stantec 2025c)	2,400 ²	2 ³	2 ⁴	83

1. Burrowing owl burrow complex associated with the observed individual.

2. Survey area not including 500-foot buffer and access road.

3. Two carcasses were observed during the survey.

4. Two burrowing owl burrows were likely associated with the observed individuals.

3.4 AQUATIC RESOURCES IN THE PROJECT AREA

Aquatic resource delineations have been conducted within the Project Area on multiple occasions between 2020 and 2025. The following subsections summarize the results of those delineations.

3.4.1 2020 DELINEATION

An aquatic resources delineation was conducted in the Project Area from 26 October 2020 to 30 October 2020 and again from 9 November 2020 to 13 November 2020 (Stantec 2021). No wetland, seeps, or springs were observed in the Project Area. A total of 96 aquatic resource features were mapped totaling 5.714 acres. These features included 92 drainages (2.65 acres), three watercourses (3.04 acres), and one riparian area¹ (0.03 acre). All 96 features were determined to be ephemeral.

3.4.2 2024/2025 DELINEATION

An aquatic resources delineation was conducted in the Project Area from 30 September 2024 to 3 October 2024 and again from 1 May 2025 to 18 June 2025 (Stantec 2025c). A total of 69 aquatic resources were mapped totaling 21.193 acres. These features included 64 ephemeral drainages (1.13 acres) and drainage segments and five watercourses/active floodplains (20.07 acres). No riparian vegetation, wetlands, seeps, playas, or springs were observed.

4. MITIGATION SITE DESCRIPTION

The Applicant proposes to mitigate Project-related impacts to desert tortoise and burrowing owl habitat through permanent preservation and management of the Kingston View mitigation site (**Appendix A, Figure 2**). Notably, this property was originally evaluated as a potential Project development site. However, desert tortoise surveys conducted on the property documented a high density of desert tortoises and exceptional habitat quality (Allied Pacific Partners 2023). In addition, biological surveys identified a high density of suitable natural and opportunistic

¹ This riparian area was associated within one of the ephemeral drainages.

burrowing owl burrows and extensive areas of open, sparsely vegetated desert habitat suitable for burrowing owl use. Three live burrowing owls were observed occupying burrows on the site, further supporting the site's capacity to support burrowing owl occupancy.

Aquatic resource delineation at the mitigation site further identified numerous waters of the State, including ephemeral drainages and associated floodplain features that are representative of the same resource types affected by the Project. These features are distributed across the site and reflect a well-developed desert drainage network, consistent with the hydrologic and geomorphic conditions present in the Project Area.

Based on these findings, the Applicant determined that development at this location would result in unavoidable impacts to high-value wildlife habitat and excluded the property from development, instead designating it for long-term conservation and mitigation purposes.

The mitigation site comprises approximately 1,859 acres and is located approximately 2 miles southeast of the Project Area, within the same regional desert tortoise recovery landscape and ecological setting. Elevations within the mitigation site range from 2,600 feet to 2,750 feet above mean sea level. Although the mitigation site is not located within USFWS-designated desert tortoise critical habitat, it lies within a broader landscape characterized by extensive contiguous undeveloped desert lands. The mitigation site is functionally connected to designated critical habitat areas to the south through intervening federally protected wilderness areas and other conserved lands.

By preserving the Kingston View mitigation site in perpetuity, the Applicant is ensuring long-term protection of high-quality desert habitat that supports sensitive species and aquatic resources, contributes to landscape-scale connectivity, and functions as a biologically important conservation area within the Eastern Mojave Desert Tortoise Recovery Unit.

4.1 VEGETATION AND LANDCOVER

The mitigation site is largely dominated by Mojave scrub vegetation, with creosote bush (*Larrea tridentata*) and burro bush (*Ambrosia dumosa*) throughout the site. Big galleta grass (*Hilaria rigida*), wolfberry (*Lycium andersonii*), common burrobrush (*Ambrosia salsola*), four wing saltbush (*Atriplex canescens*), brittlebush (*Encelia farinosa*), and *Bromus* spp. grass were also present and small dunes within the mitigation site had honey mesquite (*Prosopis glandulosa*). Non-native species included tumbleweed (*Salsola tragus*) at the northern end of the site and salt cedar (*Tamarix* spp.) at the southwest part of the site (Allied Pacific Partners 2023).

4.2 DESERT TORTOISE IN THE MITIGATION AREA

Desert tortoise presence/absence surveys conducted at the mitigation site in October 2023 documented a robust and well-distributed desert tortoise population. Survey results identified 26 live desert tortoises (23 adults and three juveniles), yielding an estimated density of 7.1 tortoises/km² (**Appendix A, Figure 6**). This density substantially exceeds both the regional average density for the Eastern Mojave Desert Tortoise Recovery Unit (1.5 tortoises/km²; USFWS 2022) and the highest density recorded within the Project Area (1.6 tortoises/km² in 2024). The presence of juveniles suggests active recruitment and long-term population viability.



In addition to live tortoises, surveyors recorded 80 desert tortoise burrows, three carcasses, and 26 scats, further indicating sustained use of the site and high habitat suitability (**Appendix A, Figure 6**). Habitat conditions at the mitigation site—including intact Mojave scrub vegetation, soil characteristics suitable for burrowing, and connectivity to surrounding desert lands—support the site’s function as high-quality desert tortoise habitat.

Although the mitigation site is not located within USFWS-designated desert tortoise critical habitat, it lies within a broader landscape characterized by extensive contiguous undeveloped desert lands. The mitigation site is functionally connected to designated critical habitat areas to the south through intervening federally protected wilderness areas and other conserved lands (**Appendix A, Figure 7**). Preservation of the mitigation site therefore contributes to maintaining large, uninterrupted habitat blocks and landscape-scale connectivity within the Eastern Mojave Desert Tortoise Recovery Unit.

Because this mitigation site supports desert tortoise densities well above both recovery unit averages and those documented at the Project Area – and because it contributes to the preservation of contiguous, protected desert landscapes – conservation of this property provides a substantially greater biological conservation benefit on a per-acre basis than on-site mitigation or mitigation based solely on land area.

4.3 BURROWING OWL IN THE MITIGATION AREA

Focused burrowing owl surveys were conducted on the mitigation site in September 2025 in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). Survey efforts included a habitat assessment and a single-pass reconnaissance non-breeding season survey to evaluate burrow availability, habitat suitability, and evidence of owl use. An additional burrowing owl survey was conducted on the mitigation site in May 2026.

One live burrowing owl was observed during the burrowing owl survey conducted in May 2026. In addition, two live burrowing owls were incidentally observed occupying burrows at the mitigation site during desert tortoise surveys conducted outside the focused burrowing owl survey period (Allied Pacific Partners 2023). Evidence of recent or ongoing burrowing owl use was also documented at 13 burrow entrances, including whitewash and pellets, and numerous additional potential burrowing owl burrows were identified across the site (Stantec 2025b; **Appendix A, Figure 8**). The presence of three live burrowing owls, combined with active sign documented during focused surveys, indicates that the mitigation site supports burrowing owl use and retains the habitat attributes necessary to support occupancy over time.

Observations of prey species, including small mammals, insects, and reptiles, further indicate that the mitigation site provides adequate foraging resources to support burrowing owl presence. Habitat conditions at the mitigation site are well suited for burrowing owls and, in several respects, superior to those within the Project Area. The mitigation site is characterized by extensive open terrain, relatively low vegetation height, and a high density of suitable natural and opportunistic burrows within a Mojave scrub community dominated by creosote bush and burro bush with a diverse mix of native shrubs and grasses. Disturbance levels are comparatively low,

and the mitigation site lacks active development or intensive land use, conditions that are favorable for burrowing owl occupancy and long-term habitat persistence.

In addition, the mitigation site is situated within a broad landscape of contiguous undeveloped desert lands and is connected to numerous federally designated wilderness areas and other protected open-space lands (**Appendix A, Figure 7**). This landscape context supports habitat continuity, reduces edge effects associated with development, and provides increased opportunities for burrowing owl movement, dispersal, and recolonization between suitable habitat patches.

By comparison, while burrowing owls were observed within the Project Area, no more than four individuals were documented during any survey year (Section 3.3), suggesting relatively low population density and more limited habitat extent. Based on the presence of three live individuals, abundance of suitable burrows, evidence of recent use, prey availability, lower disturbance levels, and strong landscape connectivity, the mitigation site represents equal or greater habitat value for burrowing owls than the Project Area, despite the limited number of live observations during focused burrowing owl surveys.

4.4 AQUATIC RESOURCES IN THE MITIGATION AREA

An aquatic resources delineation was conducted at the mitigation site from 23 September 2025 to 25 September 2025 (Stantec 2025d). A total of 48 aquatic resources were mapped totaling 23.24 acres. These features included 46 ephemeral drainages (2.72 acres) and 2 watercourses/active floodplains (20.52 acres). No riparian vegetation, wetlands, seeps, playas, or springs were observed.

The aquatic resources present at the mitigation site are of the same general type as those affected by the Project, consisting entirely of ephemeral drainage features and associated floodplain/watercourse systems typical of the surrounding desert landscape. As such, the mitigation site satisfies the regulatory agencies expectations that compensatory mitigation occur within waters of similar type and functional characteristics as those impacted by the Project. The mapped features exhibit comparable hydrologic regimes, geomorphic expression, and episodic flow-driven processes, indicating functional similarity to the aquatic resources identified within the Project Area.

In addition, the mitigation site supports a high density and distribution of aquatic features across the landscape, with drainages and floodplain features occurring throughout the site rather than being isolated or limited in extent. This pattern reflects a well-developed desert drainage network and provides multiple opportunities for preserving the range of aquatic functions affected by the Project, including conveyance, sediment transport, and ephemeral surface flow connectivity.

From an acreage and feature-based perspective, the mitigation site contains substantially more aquatic resources than would be impacted by the Project. The presence of 48 mapped aquatic features totaling 23.24 acres, including both ephemeral drainages and floodplain features, demonstrates that the site has sufficient capacity to fully offset Project-related impacts to waters of the State. Importantly, both the number of features and the total acreage of similar resource

types exceed those impacted, ensuring that the mitigation approach preserves not only equivalent resource types but also a robust representation of those resources across the site.

5. MITIGATION STRATEGY

5.1 DESERT TORTOISE AND BURROWING OWL

Within California, the Project could temporarily disturb up to approximately 2,400 acres of desert tortoise and burrowing owl habitat during construction and operation. However, permanent habitat loss is limited to approximately 100 acres in California associated with discrete Project infrastructure, such as generation-tie poles, solar array piles, the operations and maintenance building, and the substation. The majority of Project-related effects will therefore be temporary and reversible with appropriate construction controls and site restoration, and will not result in long-term loss of habitat function across most of the Project Area. Following construction, the permanent perimeter fence is proposed to be raised approximately 6 inches above grade, which would allow desert tortoises and other wildlife to move back into and through the Project Area during operations.

To address both temporary disturbance and permanent habitat loss, the Applicant proposes to mitigate impacts through permanent habitat preservation at a conservation ratio of 0.75:1 for total disturbance, and approximately 18:1 for permanent habitat loss. Although the preserved acreage is less than a strict 1:1 land-area ratio, the mitigation site provides substantially greater biological value on a per-acre basis for both desert tortoise and burrowing owl when compared to the Project Area.

For desert tortoise, the mitigation site supports densities approximately 4.5 times higher than those documented in the Project Area. When evaluated on a biological basis—measured by the number of individuals conserved, habitat quality, and long-term landscape function rather than acreage alone—the proposed mitigation provides an equal or greater conservation benefit than a standard area-based mitigation approach.

For burrowing owl, the mitigation site supports extensive areas of suitable habitat characterized by a high density of natural and opportunistic burrows, evidence of recent or ongoing use (including occupied burrows observed during desert tortoise surveys), prey availability, open terrain, and comparatively low levels of disturbance. Additionally, a total of three live burrowing owls were documented at the mitigation site. This combination of documented occupancy, active sign, and strong habitat conditions demonstrates that the site supports burrowing owl use and retains the capacity to support occupancy over time. Given the species' well-documented variability in site occupancy, reliance on habitat features and evidence of use—rather than snapshot population counts—provides a more appropriate measure of habitat value.

In addition, the mitigation site is embedded within a broader network of contiguous undeveloped and protected desert lands, including multiple designated wilderness areas. This landscape context supports habitat continuity and connectivity, reduces fragmentation and edge effects, and enhances long-term habitat resilience for species such as desert tortoise and burrowing owl that rely on large, open desert landscapes and may shift local distribution in response to prey

availability, disturbance, or climatic conditions. Protection of the mitigation site therefore contributes to landscape-scale conservation objectives beyond the immediate mitigation acreage.

In addition to off-site mitigation, the Applicant will implement extensive AMMs at the Project Area, including:

- Pre-construction clearance surveys conducted by authorized desert tortoise biologists and burrowing owl biologists.
- Installation and maintenance of construction exclusion fencing, where appropriate.
- On-site biological monitoring during construction activities.
- Desert tortoise relocation in accordance with USFWS and CDFW guidance where avoidance is not feasible.
- Worker environmental awareness training and vehicle speed restrictions.

These measures are expected to substantially reduce the likelihood of direct take and minimize indirect impacts to desert tortoises and burrowing owls that may occur within or adjacent to the Project Area.

5.2 AQUATIC RESOURCES

For aquatic resources/Waters of the State, the mitigation site is an appropriate mitigation property because it contains the same general resource types affected by the Project and supports a substantial amount of aquatic habitat relative to the anticipated impact area. Aquatic resource delineation at the mitigation site identified 48 aquatic resources totaling 23.24 acres, including 46 ephemeral drainages totaling 2.72 acres and two floodplain features totaling 20.52 acres. These aquatic features are representative of desert drainage systems similar in form and function to those affected by the Project, supporting the site's suitability for compensatory mitigation of impacts to waters of the State. Based on the impact acreages provided for the Project, the mitigation site could provide an approximately 45.3:1 acreage-to-impact ratio for permanent impacts to ephemeral drainages (2.72 acres of mitigation-site ephemeral drainages compared to 0.06 acre of permanent drainage impacts) and an approximately 51.3:1 ratio for permanent impacts to floodplain features (20.52 acres of mitigation-site floodplain features compared to 0.40 acre of permanent floodplain impacts). Based on these acreage comparisons, the mitigation site contains more than sufficient aquatic resources to offset the Project's permanent impacts while preserving aquatic features of the same general type within the same regional desert landscape.

5.3 CONCLUSION

Taken together, the Project's avoidance-driven site selection, implementation of robust AMMs, and permanent preservation of high-quality habitat that supports higher desert tortoise densities, extensive suitable burrowing owl habitat, and substantial aquatic resources constitute a comprehensive and biologically meaningful mitigation strategy. Conservation of the Kingston View mitigation site protects higher-quality habitat for desert tortoise and burrowing owl; preserves numerous aquatic features similar to those affected by the Project, including ephemeral drainages and floodplain features; and contributes to large, connected desert habitat blocks in a manner that is biologically equivalent to, or more effective than, mitigation based solely on acreage.



Accordingly, the proposed mitigation is appropriate, proportional to Project impacts, and consistent with desert tortoise conservation, burrowing owl habitat preservation, and Waters of the State mitigation objectives under applicable CDFW jurisdiction.

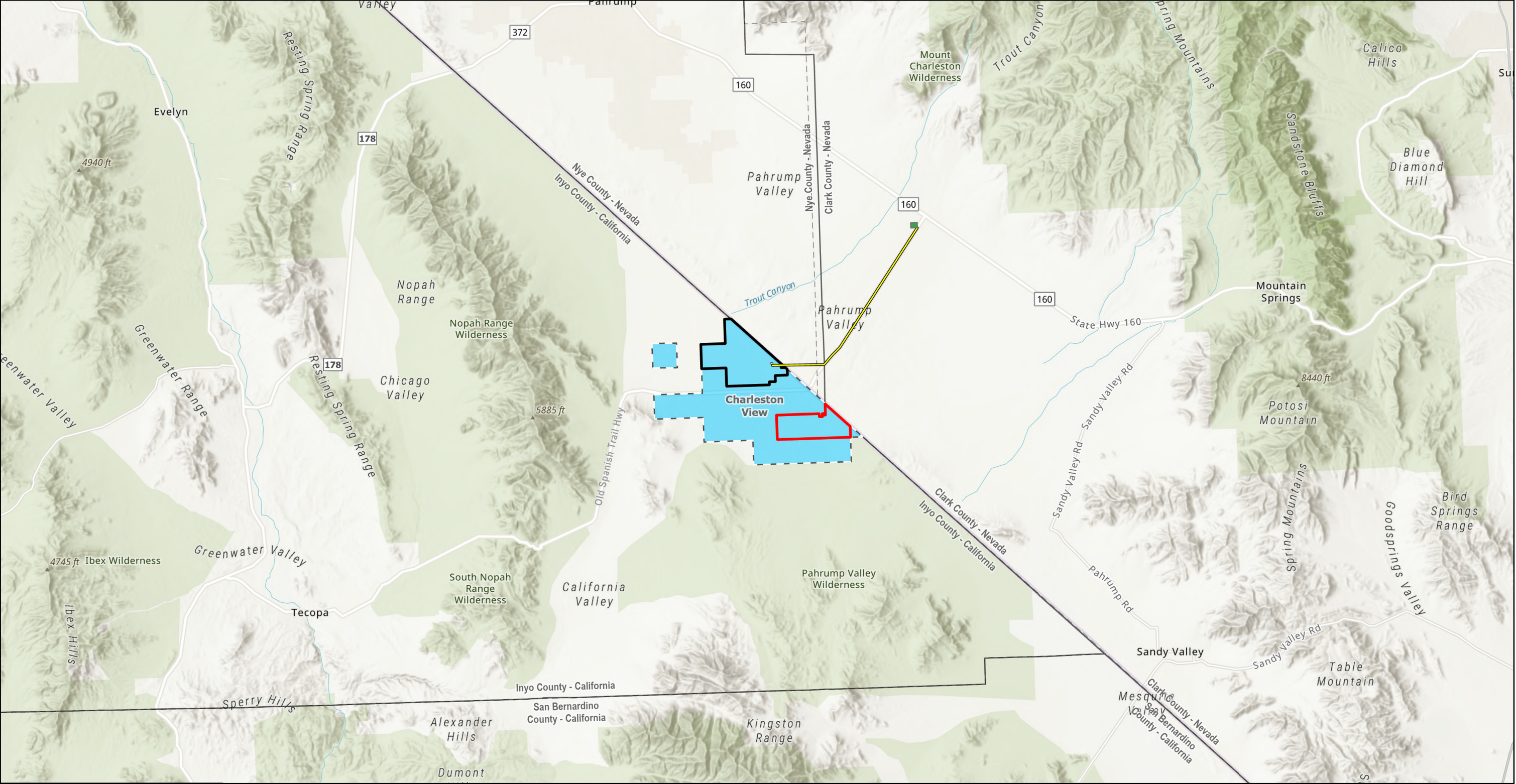
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APPENDIX A FIGURES

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DRAWN BY: Henrik Westerkam



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

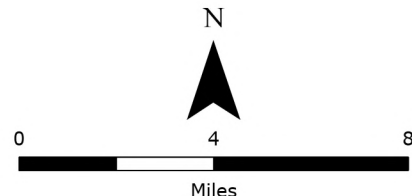
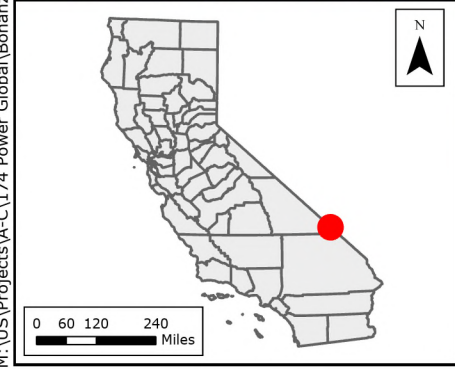
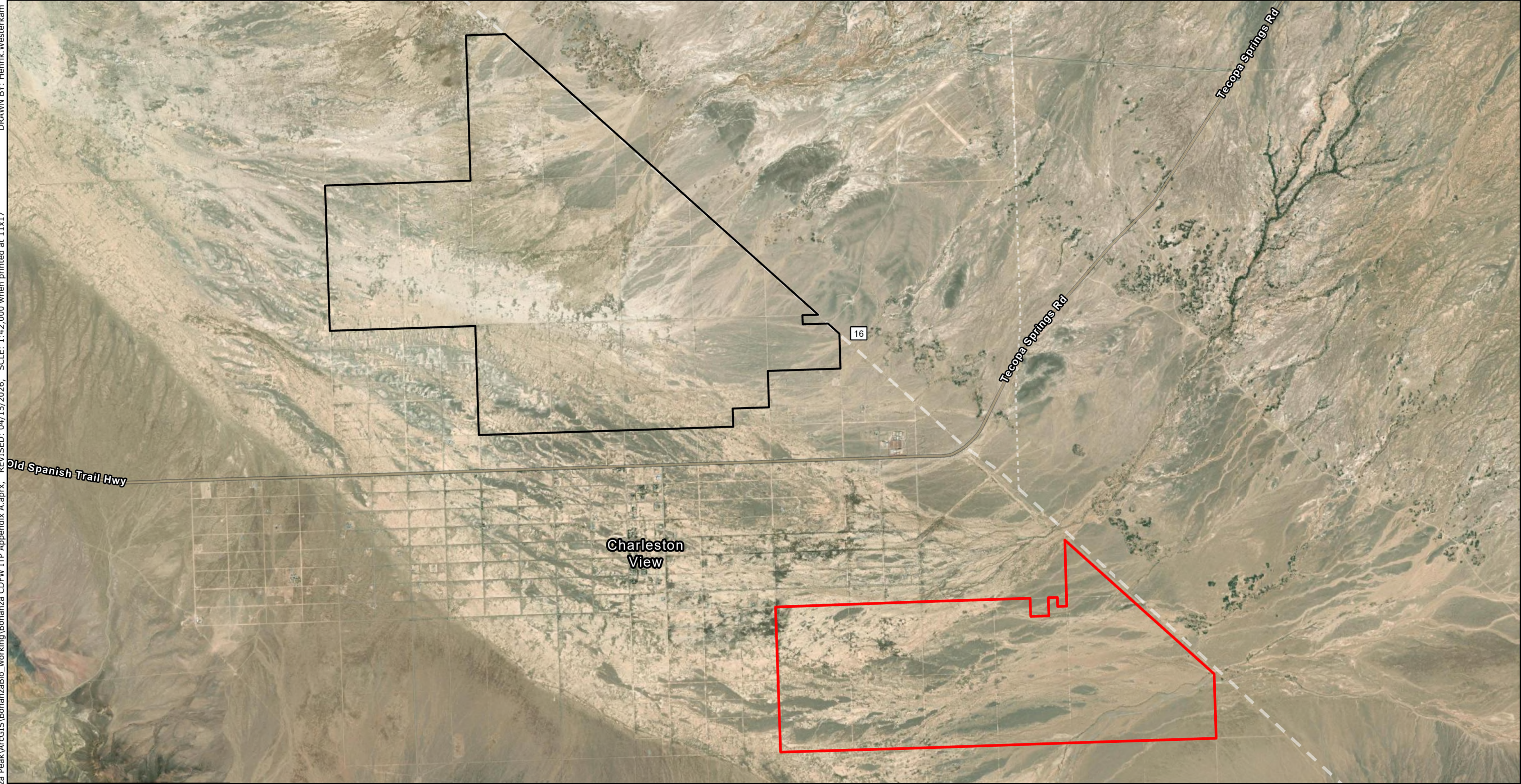


Figure 1
Project Vicinity
Bonanza Peak Energy Project
Bonanza Peak Solar, LLC
Calvada Springs, CA



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Legend

-  Project Area
-  Kingston View Mitigation Site

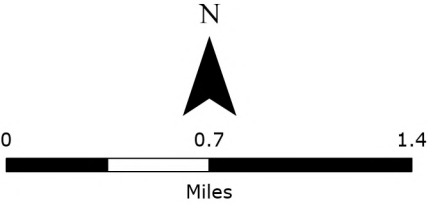
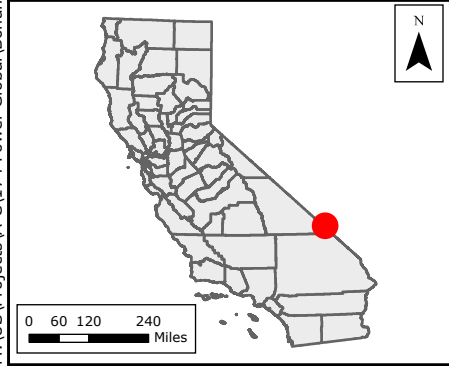
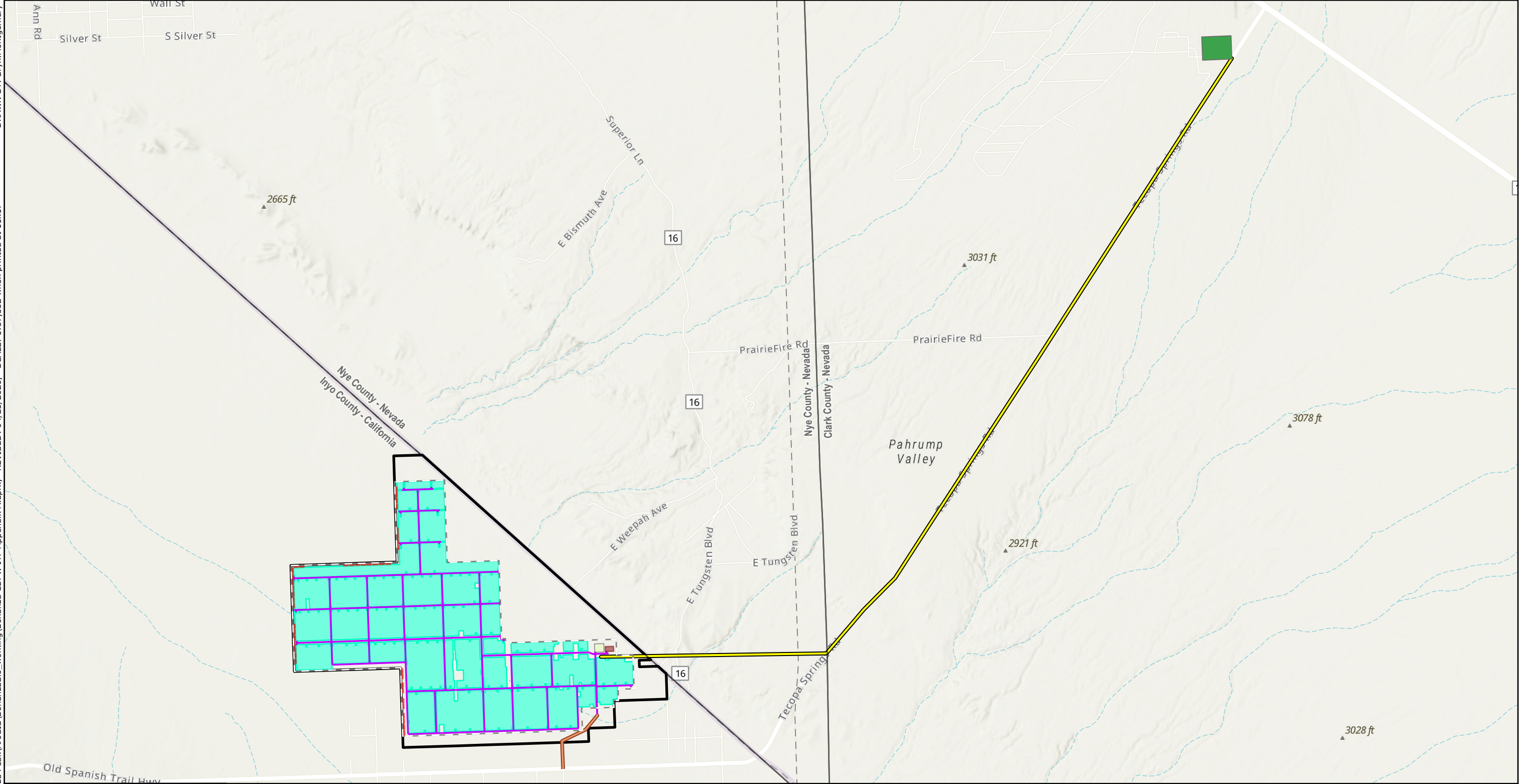


Figure 2
Kingston View Mitigation Site
Bonanza Peak Energy Project
Bonanza Peak Solar, LLC
Calvada Springs, CA



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DRAWN BY: Bryn Montgomery



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

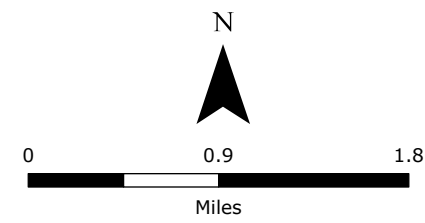
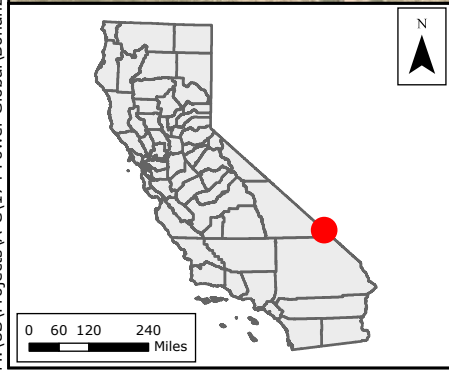
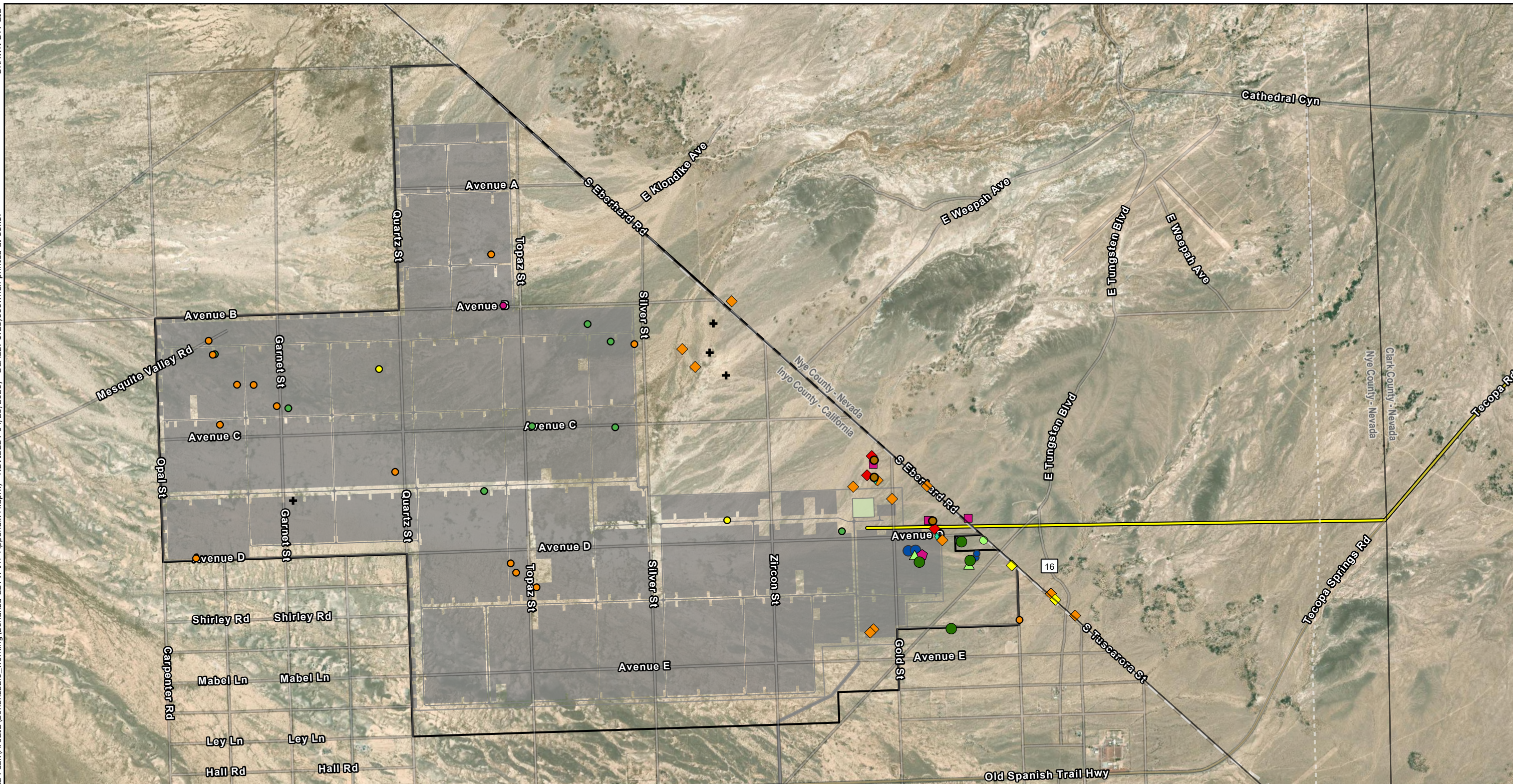


Figure 3
Project Components
Bonanza Peak Energy Project
Bonanza Peak Solar, LLC
Calvada Springs, CA

The ERM logo, consisting of a green circular graphic with radiating lines and the letters 'ERM' in a bold, sans-serif font.

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Legend

Project Area	Gen-tie Alignment
Project Substation	Project Developed Area
Class 2	Pallet
Class 3	Tortoise Burrow
Class 4	Tortoise Observation
Pallet	
DETO Burrows	

DETO Survey Results (2025) Stantec DETO Survey Results (2024) DETO Survey Results (2020)

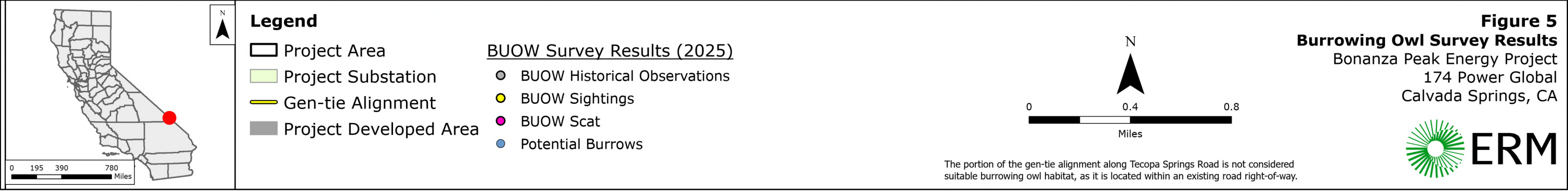
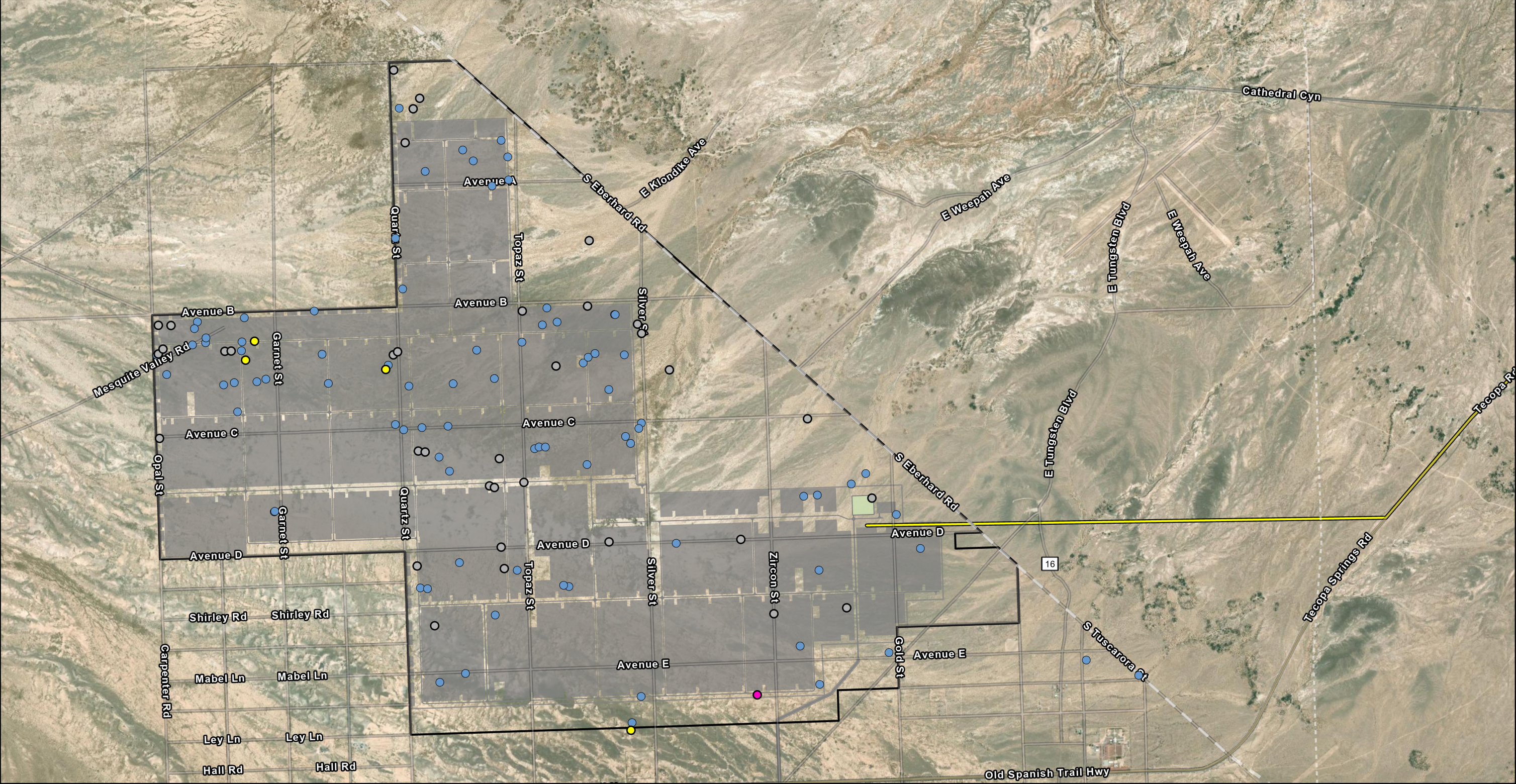
Burrow, Class 1	Pallet
Burrow, Class 2	Tortoise Observation
Burrow, Class 3	Scat
Carcass	
Dig Marks/Tracks	

Figure 4
Desert Tortoise Survey Results
Bonanza Peak Energy Project
Bonanza Peak Solar, LLC
Calvada Springs, CA

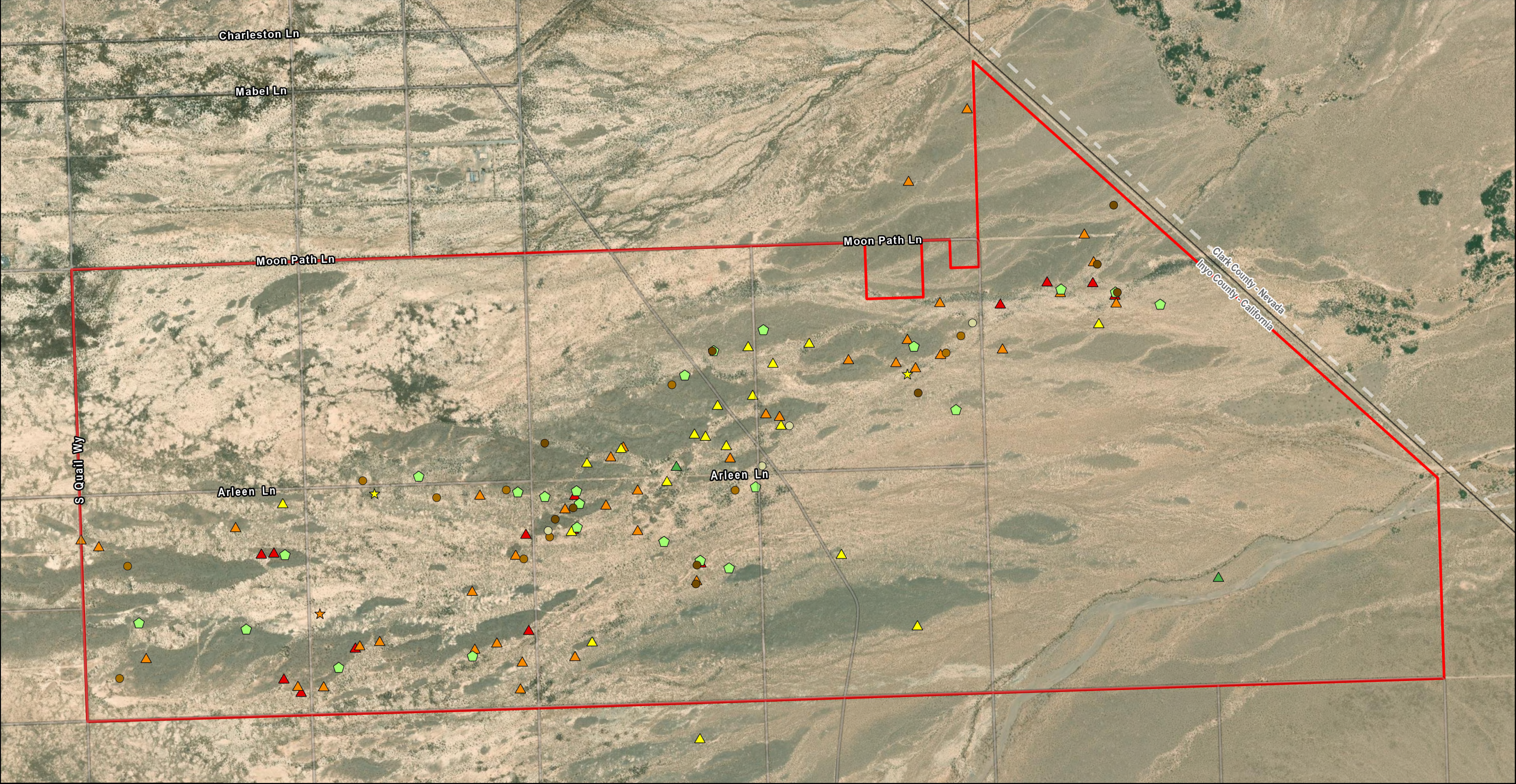
0 0.4 0.8
Miles

The portion of the gen-tie alignment along Tecopa Springs Road is not considered suitable desert tortoise habitat, as it is located within an existing road right-of-way.





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Legend

 Kingston View Mitigation Site

Survey Results

- | | | |
|-----------------------------------|-----------------------------------|--------------------------------|
| ★ Class 2 (1 found) | ▲ DETO Burrows Class 3 (20 found) | ● DETO Scat Class 1 (10 found) |
| ★ Class 3 (2 found) | ▲ DETO Burrows Class 4 (4 found) | ● DETO Scat Class 2 (12 found) |
| ▲ DETO Burrows Class 1 (14 found) | ⬠ DETO Observations | ● DETO Scat Class 3 (4 found) |
| ▲ DETO Burrows Class 2 (42 found) | | |

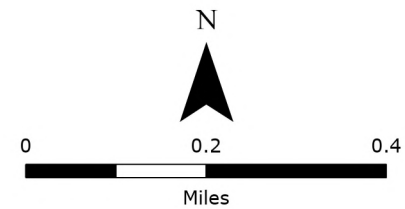
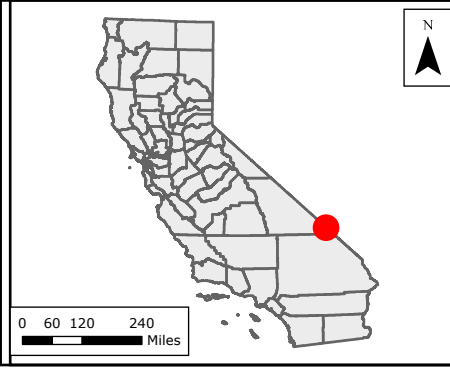
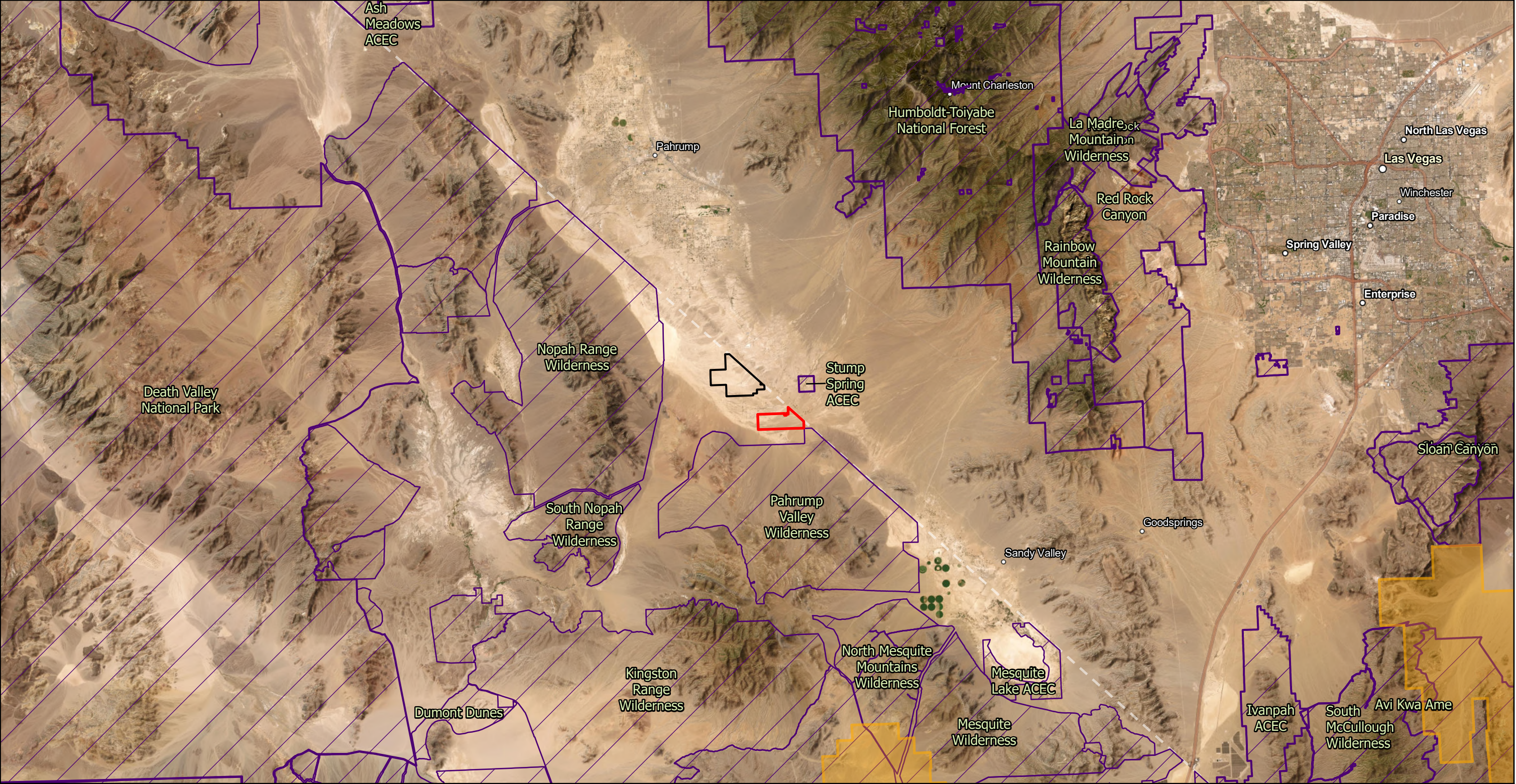


Figure 6
Kingston View
Desert Tortoise Survey Results
Bonanza Peak Energy Project
Bonanza Peak Solar, LLC
Calvada Springs, CA



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Legend

- Project Area
- Kingston View Mitigation Site
- Desert Tortoise Critical Habitat
- Protected Areas

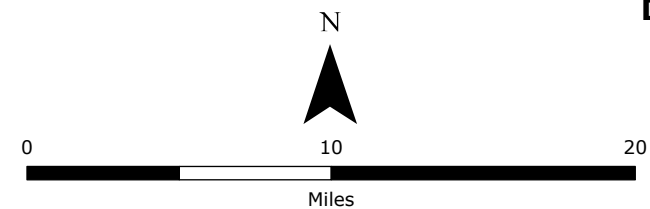
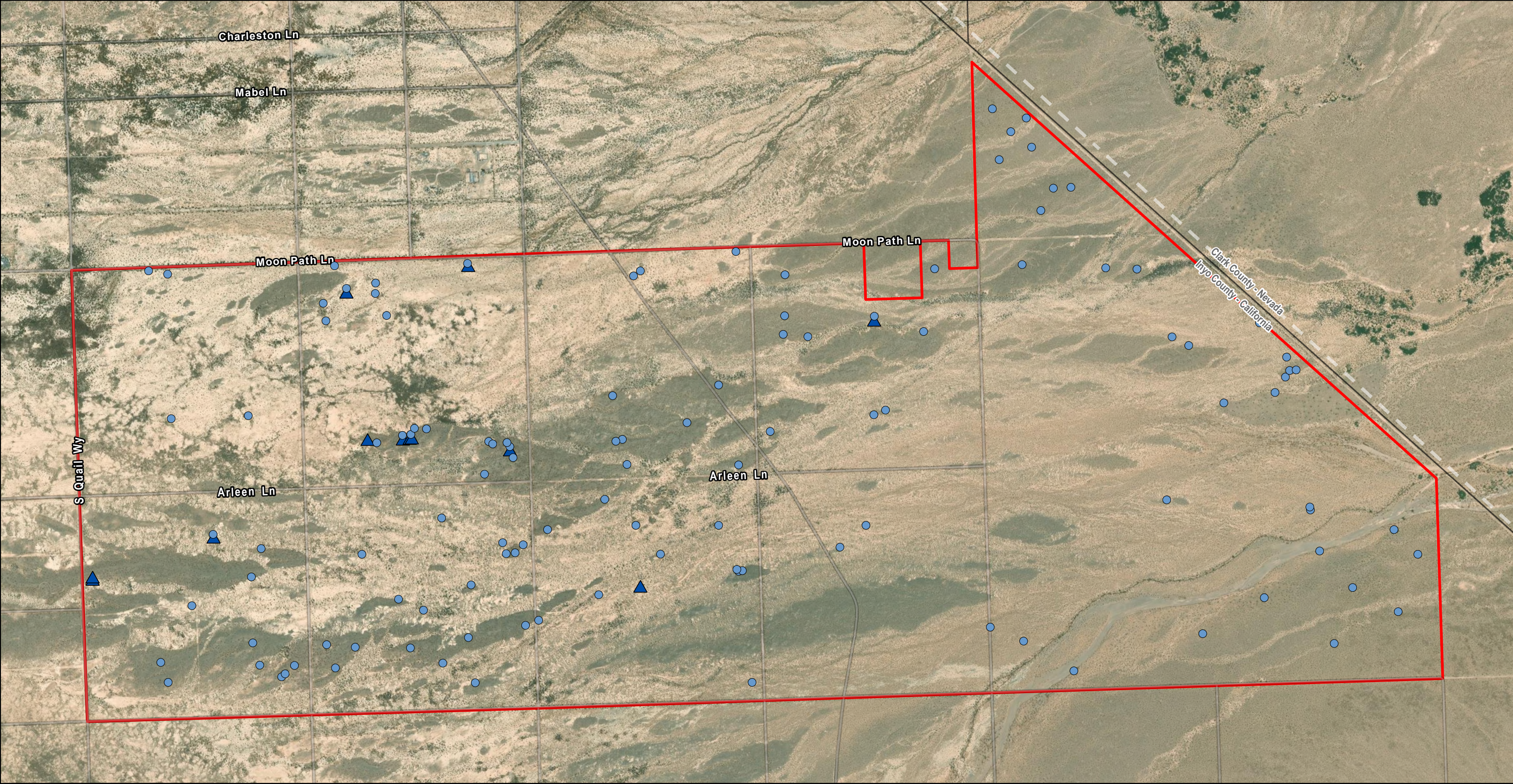


Figure 7
Desert Tortoise Critical Habitat and Protected Areas
Bonanza Peak Energy Project
Bonanza Peak Solar, LLC
Calvada Springs, CA

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Legend

- Kingston View Mitigation Site
- Project Area
- Burrowing Owl Sign
- Potential Burrowing Owl Burrow

BUOW Survey Results (2025)

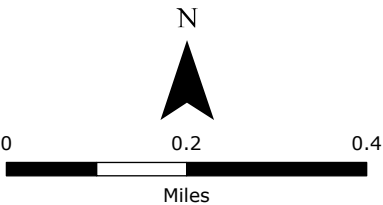


Figure 8
Kingston View
Burrowing Owl Survey Results
Bonanza Peak Energy Project
174 Power Global
Calvada Springs, CA





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