

DOCKETED	
Docket Number:	09-AFC-05C
Project Title:	Abengoa Mojave Compliance
TN #:	271960
Document Title:	COMP3-02-00 Monthly Compliance Report for Gen-Tie Construction – MSP_ December 2025
Description:	N/A
Filer:	Mahnaz Ghamati
Organization:	Abengoa Solar
Submitter Role:	Applicant
Submission Date:	8/11/2026 2:54:36 PM
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Mojave Solar LLC

42134 Harper Lake Road
Hinkley, California 92347

Phone: 760 308 0400

Submitted Electronically

Subject:	09-AFC-5C
Condition Number:	COPM 3
Description:	COMP 3-01-00 Compliance Matrix for Gen-Tie Construction – Mojave Solar Project - December 2025
Submittal Number:	COMP 3-01-00

January 5, 2026

Ashley Gutierrez, CPM
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Ashley.Gutierrez@energy.ca.gov

Ms. Gutierrez,

In accordance with Condition COMP-3 of the Certificate and the staff's approval of the post-certification change for the Mojave Solar Project and Overnight Solar Shared Facilities (TN#265190), please find attached the monthly compliance report (December 2025) for your review.

Compliance-4

Overnight Solar is scheduled to begin gen-tie construction on the Mojave Solar site on January 14, 2026. This submittal includes the compliance matrix developed by Overnight Solar to ensure Mojave Solar remains in full compliance with all applicable CEC requirements throughout the gen-tie construction.

Additionally, the construction schedule for the gen-tie is provided. To ensure safe and reliable completion of the work, a temporary transmission line will be installed during a planned Mojave Solar outage.

BIO-1

CDFW-approved biologists will provide the required biological monitoring and survey support. The following approval letters are included:

1. **Incidental Take Permit No. 2081-2024-032-06**
Overnight Solar Project; Mojave Desert Tortoise, Mohave Ground Squirrel, and

Mojave Solar LLC

42134 Harper Lake Road
Hinkley, California 92347

Phone: 760 308 0400

Western Burrowing Owl Authorized Biologist and Biological Monitor Approvals
– *November 10, 2025*

2. **Incidental Take Permit No. 2081-2024-032-06**

Overnight Solar Project; Mojave Desert Tortoise, Mohave Ground Squirrel, and
Burrowing Owl Authorized Biologist and Biological Monitor Approvals –
November 13, 2025

3. **Incidental Take Permit No. 2081-2024-032-06**

Overnight Solar Project; Mojave Desert Tortoise, Mohave Ground Squirrel, and
Burrowing Owl Authorized Biologist and Biological Monitor Approvals –
December 8, 2025

CUL-1

Overnight Solar has established agreements for cultural monitoring with:

- Morongo Band of Mission Indians
- Yuhaaviatam of San Manuel Nation

PAL-1

Chronicle Heritage will provide paleontological monitoring and surveys for the project.

Should you have any questions, comments, or require further information, please do not hesitate to contact us.

Sincerely

Mahnaz Ghamati

Quality, Environmental & Compliance Manager

Mojave Solar Project

42134 Harper Lake Rd

Hinkley, CA 92347

Cell: (760)498-0549

mahnaz.ghamati@atlantica.com

Mojave Solar LLC

42134 Harper Lake Road
Hinkley, California 92347

Phone: 760 308 0400

Attachments:

1. OSP-MSP Compliance Matrix
2. 12.24.25 Overnight 3-week Look Ahead_Mojave
3. Incidental Take Permit No. 2081-2024-032-06; Overnight Solar Project; Mojave Desert Tortoise, Mohave Ground Squirrel, and Western Burrowing Owl Authorized Biologist and Biological Monitor Approvals, November 10, 2025
4. Incidental Take Permit No. 2081-2024-032-06; Overnight Solar Project; Mojave Desert Tortoise, Mohave Ground Squirrel, and Burrowing Owl Authorized Biologist and Biological Monitor Approvals, November 13, 2025
5. Incidental Take Permit No. 2081-2024-032-06; Overnight Solar Project; Mojave Desert Tortoise, Mohave Ground Squirrel, and Burrowing Owl Authorized Biologist and Biological Monitor Approvals, December 8, 2025

MSP COC ID	MSP Approved Plan / Requirement Already in Place	What OSP Must Do (Use MSP Requirement)	What OSP Must Submit to MSP	Timing to Maintain MSP Compliance	Notes/Status
COMPLIANCE-3	MSP Monthly Compliance Reporting Framework	Track activities under MSP COCs	OSP compliance documentation	MSP Monthly Compliance Report (MCR)	
COMPLIANCE-4	MSP Pre-Construction Matrix & Tasks	Follow MSP pre-construction requirements	Required documentation supporting MSP matrix	Prior to start of OSP ground disturbance	
AQ-SC1	MSP-designated Air Quality Construction Mitigation Manager (AQCMM)	Operate under MSP AQCMM authority	Confirmation OSP is covered by MSP AQCMM	Before ground disturbance	
AQ-SC2	MSP Air Quality Construction Mitigation Plan (AQCMP)	Implement MSP AQCMP measures	Confirmation of adherence / deviations	Prior to & during construction	
AQ-SC3	MSP Fugitive Dust Control Measures	Implement dust suppression	Dust control documentation	Monthly (MCR)	
AQ-SC4	MSP Dust Plume Response Procedures	Follow plume response actions	Plume response & complaint summaries	Monthly (MCR)	
AQ-SC5	MSP Diesel Equipment Controls	Use compliant diesel equipment	Equipment lists & maintenance records	Monthly (MCR)	
BIO-1	MSP-approved Designated Biologist (DB)	Ensure DB oversight	Confirmation of DB coverage	Before mobilization	
BIO-2	MSP biological monitoring & reporting system	Conduct monitoring per MSP protocols	Logs, incident reports	Monthly / Annual	
BIO-3	MSP-approved Biological Monitors	Use only approved monitors	Training/coverage confirmation	Before monitoring	
BIO-4	MSP biological stop-work & corrective action protocol	Stop work and notify MSP immediately	Incident description & corrective actions	Immediately / CPM determination	
BIO-5	MSP Biological WEAP	Ensure worker training	Training rosters & totals	Monthly	
BIO-6	MSP-approved BRMIMP	Implement BRMIMP measures	Surveys, monitoring results	Monthly / as triggered	
BIO-7	MSP mitigation tracking & closure process	Track mitigation completion	Inputs for MSP termination report	≤30 days post-construction	
BIO-8	MSP nesting bird survey procedures	Conduct surveys per MSP methods	Letter-report & maps	≥10 days before mobilization	
BIO-14	MSP badger & kit fox avoidance measures	Conduct surveys & avoidance	Survey report	≤30 days after surveys	
BIO-18	MSP Raven Management Plan (RMP)	Implement raven measures	Implementation records; payment proof	Prior to disturbance; monthly	
BIO-21	MSP Biological Opinion (if applicable)	Comply with BO terms	Evidence of compliance	As required	
CUL-1	MSP-approved CRS, CRMs, specialists	Work under approved cultural staff	Coverage confirmation	Before disturbance	
CUL-2	MSP cultural maps, drawings, schedules	Follow approved footprint & phasing	Schedule/footprint changes	Weekly / within 5 days	
CUL-3	MSP CRMMP / ARMR procedures	Implement monitoring & mitigation	Monitoring data; curation fee commitment	Pre-construction	
CUL-4	MSP Cultural Resources Report (CRR) process	Support CRR preparation	Field data & documentation	≤90 days post-disturbance	
CUL-5	MSP Cultural WEAP	Complete training	Acknowledgment forms	Included in MCR	
CUL-6	MSP daily cultural monitoring & reporting	Conduct daily monitoring	Logs, no-find emails, summaries	Daily / Monthly	
CUL-7	MSP discovery response protocol	Stop work; follow CRS direction	Discovery notices; DPR 523 forms	24–48 hours	
PAL-1	MSP-approved PRS & monitors	Ensure PRS coverage	Coverage confirmation	Before excavation	
PAL-2	MSP project maps & schedules	Follow approved footprint	Revised maps/schedule notices	≤5–15 days	
PAL-3	MSP PRMMP	Implement monitoring plan	Monitoring logs	Monthly	
PAL-4	MSP Paleontological WEAP	Complete training	Training certificates	Monthly	
PAL-5	MSP paleontological reporting procedures	Follow reporting protocols	Monitoring summaries	Monthly	
PAL-6	MSP curation & contract requirements	Follow curation process	Transmittal letters & fee records	Upon fossil submittal	
PAL-7	MSP Paleontological Resource Report (PRR)	Provide field inputs	Discovery & recovery data	≤90 days post-disturbance	
CIVIL-1	MSP grading, drainage, geotech approvals	Follow approved designs	Adverse condition notice	As triggered	
CIVIL-2	MSP unforeseen condition response	Stop work and notify	Stoppage & approval notices	≤24 hours	
GEN-1	MSP facility design & CBO approvals	Notify MSP of proposed work	Description of work	≥30 days prior	
GEN-5	MSP-approved responsible engineers	Use approved engineers	Engineer change notifications	≤5 days	
SOIL & WATER-1	MSP DESC	Implement BMPs	Effectiveness documentation	Monthly / Annual	
SOIL & WATER-2	MSP WDR compliance	Comply with WDR limits	Monitoring & violation reports	Per WDR	
SOIL & WATER-3	MSP Channel Maintenance Plan	Implement CMP	Annual maintenance info	Annual	
SOIL & WATER-5	MSP water use limits & metering	Track usage	Usage data	Semi-annual / Annual	
TRANS-2	MSP Construction Traffic Control Plan	Follow CTCP	Incident documentation	During mobilization	
WORKER SAFETY-1	MSP fire prevention & safety plans	Comply with MSP plans	Training confirmation	Pre-construction	
WORKER SAFETY-3	MSP Construction Safety Supervisor program	Coordinate with MSP CSS	Safety inspection inputs	Monthly	



November 10, 2025

Sent via email

Frederick Redell, US Director
Overnight Solar, LLC
1553 W, Todd Dr., Suite 204
Tempe, AZ 85283

Re: Incidental Take Permit No. 2081-2024-032-06; Overnight Solar Project; Mojave Desert Tortoise, Mohave Ground Squirrel, and Western Burrowing Owl Authorized Biologist and Biological Monitor Approvals

Dear Mr. Redell,

CDFW has reviewed your request for Authorized Biologists and Biological Monitors for the Overnight Solar Project (Project) in San Bernardino County. Activities listed pertain to the state endangered Mojave desert tortoise (*Gopherus agassizii*), the state threatened Mohave ground squirrel (*Xerospermophilus mohavensis*), and the California Endangered Species Act candidate western burrowing owl (*Athene cunicularia hypugaea*).

Based on CDFW's review of resumes and any additional documents, the approvals for **Mojave Desert Tortoise** below apply:

1. The following are approved as **Biological Monitors** and may **independently**: conduct visual surveys; conduct burrow surveys; conduct exclusion fence inspections; inspect, monitor, document, and report compliance; notify CDFW of take or injury; conduct education programs; escort Project vehicles and equipment; and perform entrapment inspections.

Karla Flores

Karl Fairchild

Based on CDFW's review of resumes and any additional documents, the approvals for **Mohave Ground Squirrel (MGS)** below apply:

2. The following are approved as **Authorized Biologists** and may **independently**: conduct visual surveys; survey burrow via scoping or camera trapping; live trapping of MGS; construct artificial burrows; excavation of burrows; handling, assessing health, and relocating of MGS per the Project's MGS Translocation Plan; inspect trenches for MGS.

Karla Flores

Karl Fairchild

Based on CDFW's review of resumes and any additional documents, the approvals for **Western Burrowing Owl** below apply:

3. The following are approved as **Authorized Biologists** and may **independently**: conduct surveys to identify, flag, and map all potential, known, and/or nesting burrows; provide a KMZ map of the burrow surveys; establish no-disturbance buffers around known and nesting burrows; increase buffers per behavioral observations for evaluation and determination of buffer effectiveness; excavate burrows or potential burrows that cannot be avoided; block unoccupied burrows that do not require excavation but are within a distance of construction to cause stress to burrowing owl if reoccupied; monitor all burrows on site; notify of injury or take of burrowing owl.

Karla Flores

Karl Fairchild

These authorizations pertain only to the Overnight Solar Project; all future projects must receive separate approvals. If you have any questions regarding this matter, please contact Marlee Poff at Marlee.Poff@wildlife.ca.gov or (909) 544-2531.

Sincerely,

DocuSigned by:

C2A3834574CB4FD...

Ashley Rosales
Senior Environmental Scientist (Supervisor)



November 13, 2025
Sent via email

Frederick Redell, US Director
Overnight Solar, LLC
1553 W, Todd Dr., Suite 204
Tempe, AZ 85283

Re: Incidental Take Permit No. 2081-2024-032-06; Overnight Solar Project; Mojave Desert Tortoise, Mohave Ground Squirrel, and Burrowing Owl Authorized Biologist and Biological Monitor Approvals

Dear Mr. Redell,

CDFW has reviewed your request for Authorized Biologists and Biological Monitors for the Overnight Solar Project in San Bernardino County. Activities listed pertain to the state endangered Mojave desert tortoise (*Gopherus agassizii*), the state threatened Mohave ground squirrel (*Xerospermophilus mohavensis*), and the CESA candidate western burrowing owl (*Athene cunicularia hypugaea*).

Based on CDFW's review of resumes and any additional documents, the approvals for **Mojave Desert Tortoise** below apply:

1. The following are approved as **Authorized Biologists** and may **independently**: conduct protocol level preconstruction surveys; conduct burrow surveys; conduct exclusion fence inspections; excavate burrows; capture, handle, process, move, and relocate individuals per the Project's relocation plan; inspect, monitor, and report compliance; notify CDFW of take or injury; perform health assessments, including rehydration and collection of biological samples; transport incidentally injured individuals to Project's approved veterinarian or wildlife rehabilitation facilities; move out of harm's way; conduct education programs; escort vehicles and equipment; perform entrapment inspections; and monitor surface disturbing activities.

Crissy Slaughter
Corey Chan

Rachel Woodward
Dalton Stanfield

2. The following are approved as **Authorized Biologists** and may **independently**: conduct protocol level preconstruction surveys; conduct burrow surveys; conduct exclusion fence inspections; excavate burrows; capture, handle, process, move, and relocate individuals per the Project's relocation plan; inspect, monitor, and report compliance; notify CDFW of take or injury; perform health assessments, including rehydration; transport incidentally injured individuals to Project's

approved veterinarian or wildlife rehabilitation facilities; move out of harm's way; conduct education programs; escort vehicles and equipment; perform entrapment inspections; and monitor surface disturbing activities.

Amanda Kalyn
Kurt Hotchkiss
Jonathan Barratt

Andrew Currylow
Sarah Baden

3. The following are approved as **Biological Monitors** and may **independently**: conduct visual surveys; conduct burrow surveys; conduct exclusion fence inspections; inspect, monitor, document, and report compliance; notify CDFW of take or injury; conduct education programs; escort Project vehicles and equipment; and perform entrapment inspections. **Under direct supervision** from a qualified Authorized Biologist may perform protocol level preconstruction surveys.

Chris Boulden

Erik Maki

Based on CDFW's review of resumes and any additional documents, the approvals for **Mohave Ground Squirrel (MGS)** below apply:

4. The following are approved as **Authorized Biologists** and may **independently**: conduct visual surveys; survey burrow via scoping or camera trapping; live trapping of MGS; construct artificial burrows; excavation of burrows; handling, assessing health, and relocating of MGS per the Project's MGS Translocation Plan; inspect trenches for MGS.

Rachel Woodard

Dalton Stanfield

5. The following are approved as **Biological Monitors** and may **independently**: conduct visual surveys; inspect trenches for MGS. **Under direct supervision** from a qualified Authorized Biologist may survey burrow via camera trapping; live trapping of MGS; construct artificial burrows; excavation of burrows.

Crissy Slaughter
Kurt Hotchkiss

Amanda Kalyn
Jonathan Barratt

Based on CDFW's review of resumes and any additional documents, the approvals for **Western Burrowing Owl** below apply:

6. The following are approved as **Authorized Biologists** and may **independently**: conduct surveys to identify, flag, and map all potential, known, and/or nesting burrows; provide a KMZ map of the burrow surveys; establish no-disturbance buffers around known and nesting burrows; increase buffers per behavioral

observations for evaluation and determination of buffer effectiveness; excavate burrows or potential burrows that cannot be avoided; block unoccupied burrows that do not require excavation but are within a distance of construction to cause stress to burrowing owl if reoccupied; monitor all burrows on site; notify of injury or take of burrowing owl.

Crissy Slaughter
Corey Chan
Amanda Kalyn

Kurt Hotchkiss
Jonathan Barratt
Rachel Woodard

7. The following are approved as **Biological Monitor** and may **independently**: monitor all burrows on site; notify of injury or take of burrowing owl. **Under direct supervision** of a qualified Authorized Biologist may conduct surveys to identify, flag, and map all potential, known, and/or nesting burrows.

Dalton Stanfield

Andrea Currylow

Direct supervision requires an Authorized Biologist approved to perform the task independently to be on-site with the individual to directly observe the task being performed so they can intervene with assistance if necessary.

These authorizations pertain only to the Overnight Solar Project; all future projects must receive separate approvals. If you have any questions regarding this matter, please contact Marlee Poff at Marlee.Poff@wildlife.ca.gov or (909) 544-2531.

Sincerely,

DocuSigned by:

C2A3834574CB4FD...
Ashley Rosales
Senior Environmental Scientist (Supervisor)



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



December 8, 2025

Sent via email

Frederick Redell, US Director
Overnight Solar, LLC
1553 W, Todd Dr., Suite 204
Tempe, AZ 85283

Re: Incidental Take Permit No. 2081-2024-032-06; Overnight Solar Project; Mojave Desert Tortoise, Mohave Ground Squirrel, and Burrowing Owl Authorized Biologist and Biological Monitor Approvals

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Based on CDFW's review of resumes and any additional documents, the approvals for **Western Burrowing Owl** below apply:

1. The following are approved as **Authorized Biologists** and may **independently**: conduct surveys to identify, flag, and map all potential, known, and/or nesting burrows; provide a KMZ map of the burrow surveys; establish no-disturbance buffers around known and nesting burrows; increase buffers per behavioral observations for evaluation and determination of buffer effectiveness; excavate burrows or potential burrows that cannot be avoided; block unoccupied burrows that do not require excavation but are within a distance of construction to cause stress to burrowing owl if reoccupied; monitor all burrows on site; notify of injury or take of burrowing owl.

John Bax

2. The following are approved as **Biological Monitor** and may **independently**: monitor all burrows on site; notify of injury or take of burrowing owl. **Under direct supervision** of a qualified Authorized Biologist may conduct surveys to identify, flag, and map all potential, known, and/or nesting burrows.

Edna Arvizu

Frederick Redell
Overnight Solar, LLC
December 8, 2025
Page 2 of 3

Direct supervision requires an Authorized Biologist approved to perform the task independently to be on-site with the individual to directly observe the task being performed so they can intervene with assistance if necessary.

These authorizations pertain only to the Overnight Solar Project; all future projects must receive separate approvals. If you have any questions regarding this matter, please contact Marlee Poff at Marlee.Poff@wildlife.ca.gov or (909) 544-2531.

Sincerely,

DocuSigned by:

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Ashley Rosales
Senior Environmental Scientist (Supervisor)