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WILLOW ROCK
ENERGY STORAGE

September 2026

Monthly Compliance Report #7

Willow Rock Energy Storage Center 21-AFC-02C

Submitted by GEM A-CAES LLC
Prepared by Strachan Consulting, LLC

Monthly Compliance Report #7

1. Introduction

The Willow Rock Energy Storage Center ("WRESC" or the "Project") (21-AFC-02C) will be a nominal 520-megawatt (MW) gross (500 MW net) and 4,160 megawatt-hour (MWh) gross (4,000 MWh net) facility using Hydrostor, Inc.'s ("Hydrostor") proprietary Advanced Compressed Air Energy Storage ("A-CAES") technology. The Project Owner and the holder of the Commission's Certification is GEM A-CAES LLC ("GEM" or the "Project Owner").

Located in unincorporated Kern County ("County"), approximately 4 miles north of Rosamond, California, the energy stored at the WRESC will be delivered to Southern California Edison's ("SCE's") Whirlwind Substation, via a new approximately 19-mile, 230 kilovolt (kV) generation-tie ("gen-tie") line. Once in operation, the WRESC will be capable of operating 24 hours per day, 7 days per week, and 365 days per year, with an approximately 50-year lifespan.

Pursuant to the Conditions of Certification ("CoCs") identified in the California Energy Commission's ("CEC") Final Decision for the Project, this Monthly Compliance Report ("MCR") has been prepared pursuant to CoC COM-6. The requirements for the MCR content specified in the CoC are included in Section 2, below. This is the seventh MCR for the WRESC Project. It covers project activities from August 1–31, 2026.

2. Summary of Monthly Compliance Report

This MCR includes the information required by COM-6, which is listed below:

- A summary of the current Project status, a revised/updated schedule if there are significant delays, and an explanation of any significant changes to the schedule (Sections 3 and 4);
- Documents required by specific CoCs to be submitted along with the MCR. Each of these items shall be identified in the transmittal letter, as well as the Conditions they satisfy, and submitted as attachments to the MCR (Section 5);
- A compliance matrix showing the status of all CoCs related to the pre-construction phase of the Project (Attachment B)
- A list of CoCs that have been satisfied during the reporting period, and a description or reference to the actions that satisfied the condition (Section 5);
- A list of any submittal deadlines that were missed, accompanied by an explanation and an estimate of when the information will be provided (Section 6);
- A cumulative listing of any approved changes to CoCs or Verification language (Section 7 and Attachment A);
- A listing of any filings submitted to, and permits issued by, other governmental agencies during the month (Section 8);

- A projection of Project compliance activities scheduled during the next two months; the Project Owner will notify the CPM as soon as any changes are made to the Project construction schedule that would affect compliance with CoCs (Section 9);
- A listing of the month's additions to the on-site compliance file (Section 10); and
- A listing of incidents, complaints, notices of violation, official warnings, and citations received during the month; a description of the actions taken to date to resolve the issues; and the status of any unresolved actions noted in the previous MCRs (Section 11).

3. Summary of Current Project Status

GEM has entered into agreements with Hatch and SER (previously referred to as Cementation) to design and construct the WRESC. Hatch is leading the design and execution of the aboveground Project components. SER is the contractor responsible for the design and construction of the Project's below ground components. In addition, Quanta has been selected as the contractor for the gen-tie line.

Environmental Compliance Update. On July 17, the CEC issued GEM, a Limited Notice to Proceed ("LNTP1") for pre-construction activities, which included trash removal, Western Joshua Tree (WJT) relocation; installation of Desert Tortoise fencing in the Early Works Area, and temporary placement of trailers. As provided in more detail below, all these activities were completed during the reporting period.

On August 19, the CEC issued GEM a second LNTP ("LNTP2") for the following activities:

- Site Mobilization
- Clearing and Grubbing
- Dawn Road Improvements
- Develop Early Works Area Stormwater Ponds
- Grade Early Works Area (subsurface area, laydown, parking, internal roads, Haul truck access and turnarounds)
- Start Site Mobilization for Subsurface Construction (Air Shaft)

The activities covered under LNTP2 are located within the lower half of the site. Activities in this area constitute the "Early Works" area site activities and are identified in Table 1, Key Events Schedule. Activities in other areas of the site which will begin after the initiation of the Early Works activities, are referred to as "Later Works" and are also identified in Table 1.

GEM continues to work with CEC staff on the review and approval of the remaining conditions for which full compliance is required for the final Notice to Proceed (NTP). Work is also in progress on compliance submittals required during Project construction. A more detailed discussion on compliance activities is included in Section 5.0.

Engineering, Procurement, and Construction Update. This section provides an update on the engineering, procurement (including contracting), and construction activities which occurred during the reporting period. As of August 31, engineering activities for the Early Works area are 79% complete. Procurement for Early Works is 69% complete.

Engineering. Engineering activities during August focused on LNTP2 activities and issuing engineering deliverables to support construction progress. Specifically work focused on submitting the following engineering plans and drawings to the DCBO for review and approval:

- Site Civil Plan
- Site Drainage Plan
- Erosion and Sediment Control Plan
- Southeast and Southwest Stormwater Management Basin Drawings
- Subsurface Pad and Access Roads Drawings
- Fencing Layout, and
- Stormwater Management Report.

In addition, Dawn Road improvement drawings were provided to support issuance of the encroachment permit from Kern County.

Procurement and Contracting. Procurement and contracting activities during the reporting period were as follows:

- A contract kick-off meeting was held with Granite Construction
- The switchgear contract was awarded to Nexus
- Circuit breaker proposal evaluations continued
- A request for proposals for site security was issued
- Five contractors were selected who will participate in the "Early Contractor Involvement" process for the major construction work packages (civil/concrete, mechanical, piping, electrical, instrumentation) which will be let in 2027 and 2028

Construction. Construction activities during August included work associated with LNTP1 and LNTP2. Specifically, the activities associated with LNTP1 were completed on the dates listed below:

- Tortoise Fencing - August 7
- Relocation of the WJTs - August 11
- Trash Removal - August 12
- Trailer Installation – August 19

As stated above, LNTP2 was issued by the CEC on August 19, allowing the Project to begin clearing and grubbing activities in the Early Works area. Activities during the reporting period included:

- Clearing and grubbing vegetation within the Early Works area was completed except within the designated Environmentally Sensitive Areas (ESA) areas
- Ripping and soaking of the storm water Ponds began in preparation for excavation

- Expanding the temporary construction trailers and parking area by an additional 20,000 square feet

- Commencing Installation of the site stormwater ditches

4. Key Events Schedule

The Key Events Schedule outlining the major milestones and activities associated with the Project is presented in Table 1. This Key Events Schedule is reflected in the latest Pre-Construction Compliance Matrix (see Section 5, below).

Table 1: Key Events Schedule

Event Description	Date
Finalize Site Control of All Parcels	March 2025
Project Certification	December 2025
Start of Commercial Operation	July 2030
SITE ASSESSMENT & PRE-CONSTRUCTION ACTIVITIES	
Start Preliminary Site Assessments (ALTA Survey)	March 2026
Start Biological Surveys	April 2026
Obtain LNTP1 for Pre-Construction Activities	July 17, 2026
Start Trash Removal, WJT Relocation, Desert Tortoise Fencing, Temporary Trailer Placement	July 20, 2026
Obtain LNTP2 for Certain Construction Activities in the Early Works Area	August 19, 2026
Begin Construction Activities Authorized Under LNTP2	August 19, 2026
SITE MOBILIZATION & CONSTRUCTION: EARLY WORKS	
Start Grading (subsurface area, laydown, parking, internal roads)	September 8, 2026
Start Dawn Road Improvements	September 28, 2026
Start Site Mobilization for Subsurface Construction (Air Shaft)	October 2026

Event Description	Date
SITE MOBILIZATION & CONSTRUCTION: LATER WORKS	
Start Pouring Major Foundation Concrete (Air Shaft Hoist)	November 2026
Start Reservoir Excavation & Site Grading	March 2027
Start Vertical Structure Installation (Air Shaft Headframe)	May 2027
Start Controlled Detonations (100 ft bgs in Air Shaft)	September 2027
Start Cavern Construction (horizontal development at 2,000 ft bgs)	December 2028
Begin Installation of Major Topside Equipment	March 2028
Complete Installation of Major Topside Equipment	October 2029
First Plant Synchronization (Startup)	May 2030
TRANSMISSION LINE ACTIVITIES	
Start Transmission Line Construction	December 2027
Complete Transmission Line Construction	June 2029
Energization and Interconnection Tests	November 2029
WATER SUPPLY LINE ACTIVITIES	
Start Antelope Valley-East Kern Water Agency (“AVEK”) Water Supply Line Connection	February 2027
Complete AVEK Water Supply Line Construction	June 2027
Start Filling Reservoir	July 2029
Complete Filling Reservoir	January 2030

5. Compliance Activities

This section of the MCR focuses on the activities related to ensuring compliance with all the Conditions of Certification. Project team efforts have been focused on obtaining CEC approval of pre-construction condition submittals in order to obtain NTP. As stated above, LNTP 2 was issued on August 19. For LNTP2, the CEC conditionally approved nine pre-construction condition submittals. The documentation for these conditions must be fully approved in order for final NTP to be issued.[1] In addition, the Drainage Erosion and Sedimentation Control Plan documentation required pursuant to Conditions CIVIL-1 and WATER-1 covering the entire WRESC site (both Early Works and Later Works areas) must be approved.

Once LNTP2 was issued, pre-construction conditions for which conditional approval was provided were included in the construction compliance matrix. This matrix includes all conditions applicable during Project construction. The construction compliance matrix is provided in Attachment B. Please note that the matrix has been color coded to reflect those items which were conditionally approved as part of LNTP2.

Compliance Activities. **Table 2** provides a list of the compliance documents that have been submitted during the reporting period, extending to September 10th, as well as any comments and approvals received from the CPM and its Delegate Chief Building Official (DCBO).

Table 2: Submitted Compliance Documents

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
AQ-SC-1	AQCMMs Thomas Stuart & Alexa Beauchamp Contact info for Proposed AQCMMs	 August 19, 2026	August 19, 2026	August 24, 2026
BIO-6	BRMIMP Rev. 2 BRMIMP Email from N. Eckert Accepting Changes in 8/14 Comments BRMIMP Rev. 3	July 28, 2026 August 14, 2026 September 4, 2026	August 14, 2026	 Conditional Approval August 19, 2026

[1] The conditional approval for Condition TRANS-2 requires that prior to operations an amendment be obtained modifying the condition language to reflect the Dawn Road improvements.

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
BIO-8	Veg Mgmt Plan Rev. 4	August 12, 2026		August 14, 2026
BIO-12	Responses to CEC/CDFW comments re WJT Mitigation Fee Invoice Invoice Provided by CEC Fee Paid to CDFW	August 11, 2026	 August 14, 2026 August 19, 2026	 August 20, 2026
BIO-16	Updated Site Plan with DT Fencing	August 6, 2026		August 13, 2026, Approved DCBO
BIO-17	Nesting Bird Survey Report Nesting Bird Survey Report Rev. 1	August 24, 2026 September 1, 2026	August 28, 2026	 September 1, 2026
BIO-19	BUOW Survey Report KMZ and shapefiles	August 6, 2026 August 7, 2026		August 13, 2026
BIO-24	Updated State Jurisdictional Waters Report Response to CEC's comments Revised Updated State Jurisdictional Waters Report	August 7, 2026 August 13, 2026 August 27, 2026	August 10, 2026 August 13, 2026 September 9, 2026	 Plan approved

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
				Sept. 9, 2026; however, add'l info re: Drainage 73 requested
CUL/TRI-1	Resumes Technical Specialists (Kate Umlauf- Architectural Historian) Resume for CRM Michelle Courtney Additional info for Michelle Additional CRMs (Erik Landis, Jessica Ramirez, Andrew Sheble) Additional Info for CRMS above	June 30, 2026 July 23, 2026 August 25, 2026 August 17, 2026 August 20, 2026	July 22, 2026; August 19, 2026	August 25, 2026 August 20, 2026, Eric Landis Approved
CUL-3	CTRMMP Rev. 1	August 15, 2026	September 3, 2026	
LAND-1	Kern County ROC Approval to CEC	August 13, 2026		August 17, 2026
LAND-2	Kern County Approval to CEC	August 13, 2026		August 17, 2026
PAL-1	Alternate PRS Michelle Courtney	August 11, 2026		August 11, 2026
PB-1	Construction Sales and Use Taxes	June 25, 2026		August 11, 2026
TRANS-1	Const. Traffic Mgmt. Plan, Rev. 1	August 6, 2026		August 17, 2026

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
	Copies of Caltrans, Kern Co Comments (included w/ Plan)			
TRANS-2	TRANS-2 Submittal to CEC (ITD/Encroachment Permit)	August 14, 2026	August 14, 2026	CEC Conditional Approval August 19, 2026
CIVIL-1/WATER-1	Stormwater Mgmt Report DESCP Stormwater Report Response to Comments & Memo DESCP Rev. 1 Stormwater Mgmt Report Rev 1	August 6, 2026 August 11, 2026 August 14, 2026 August 18, 2026 Submitted to DCBO August 28, 2026	DCBO Comments August 12, 2026 CEC DESCP Comments 8/12/2026 DCBO Comments August 13, 2026	Early Works Approval August 18, 2026
WORKER SAFETY-1	Construction Emergency Action Plan Rev. 3	August 26, 2026		DCBO Approved August 27, 2026

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
WORKER SAFETY-1	Construction Emergency Response Plan Rev.2 Construction Emergency Response Plan Rev.3	August 3, 2026 August 26, 2026		August 25, 2026 DCBO approved August 27, 2026
WORKER SAFETY-1	Construction Fire Protection Plan Rev. 1 Construction Fire Protection Plan Rev. 2	June 22, 2026 August 14, 2026	DCBO Conditional Approval Comments Rec'd June 22, 2026 DCBO Comments August 17, 2026	Conditional DCBO approved June 22, 2026 Conditional DCBO Approval August 17, 2026
Worker Safety-3	Submittal of info for Interim/Back-up CSS (Joseph Chesno Hatch) and Replacement CSS (Shawn Henderson)	August 25, 2026	August 25, 2026	Joseph Chesno Approved August 28, 2026 Shawn Henderson approved by CEC for aboveground work Sept. 1, 2026

Required Compliance Documents Submitted with this Report. The Final Decision sets forth specific conditions, many of which include reporting requirements that must be addressed in the MCR. With the implementation of LNTP1 for Pre-Construction Activities, compliance activities were initiated for the conditions listed below. Also included are the required compliance documents for these conditions.

- **AQ-SC-3, AQ-SC-4, and AQ-SC5**: The Air Quality Construction Mitigation Manager (AQCMM) for the project is responsible for directing and documenting compliance with

the air quality conditions of certification related to pre-construction. The AQCMM's monthly report is provided in Appendix C of this MCR.

- **BIO-2**: The Designated Biologist's report is included in Attachment D.
- **BIO-5, CUL-4, PAL-4**: The Worker Environmental Awareness Program (WEAP) training certification forms are included in Attachment E. A total of 95 persons were trained during the reporting period. The WEAP Trainers were Jeremy Paris and Kate Moss (Biological Resources), David Schroeder (Paleontological Resources), and Ryan Arp (Cultural Resources).
- **CUL/TRI-4**: The Cultural Resources Specialists Monthly Report is being filed separately as a confidential filing.
- **GEN-3**: A statement from the DCBO acknowledging receipt of payment is provided by the DCBO directly to the CEC in its Weekly Status Report sent directly to the CPM.
- **PAL-6**: A summary of monitoring and paleontological activities and the daily monitoring logs of paleontological resource activities are included in Attachment F.
- **PH-1:** A summary of actions taken to maintain compliance with the Valley Fever measures in the condition is included in the Construction Safety Supervisor's report included in Attachment G.
- **WORKER SAFETY-3**: The Construction Safety Supervisor's report is included in Attachment G.
- **TRANS-1:** The WRESC Traffic Management Plan states that the MCR shall be used to communicate the status of all construction-related traffic management in the project area. The report shall provide a status of all construction and traffic management on-site. This information is included in Attachment H.

6. Status of Delayed Submittals

With is issuance of LNTP2, there were no late submittals during the reporting period.

7. Approved Changes to Conditions of Certification or Verification Language and Condition Clarifications

Below are summaries of the Verification language changes approved to date and clarifications on specific condition. The full text of the Verification language changes for the conditions listed is included in Attachment A.

Verification Language Changes to Worker Safety-1 and 11. To support the Early Works activities, GEM requested modification to the Verification timing of two CoCs to align with the Early Works construction schedule. The CEC CPM in emails to Laurel Lees dated March 16, 2026, and March 27, 2026, approved to Verification timing modifications for some of the CoCs. Specifically, these include:

- Worker Safety-1: The submittal of the Construction Exposure Monitoring Program, Mining Safety and Health Program, and Construction Fire Protection Plan (underground) may occur prior to the start of cavern construction.

  In addition, the Staff approved changes allowing the Hazardous Materials Business Plan and the Spill Prevention, Control, and Countermeasure Plan which are included in Worker Safety-1 to be submitted in compliance with the Verification for HAZ-1 (which also requires submittal of these plans) rather than under Worker Safety-1.

- Worker Safety-11: The Verification for item 8 (consultation with the Kern County Fire Department in preparing subsurface fire protection and rescue procedures), and item 9 (pre-construction and excavation conference with the CPM, Cal OSHA Mining and Tunneling Unit, the DCBO, and the DCBO Safety Monitor) can occur prior to the start of cavern construction.

- Worker Safety-11: The Verification timing for item 1 (installation of knox boxes) and item 4 (closed-circuit television) was updated to require demonstration of compliance prior to operations, rather than construction.

- Worker Safety-11: The Verification timing for item 2, installation of remote fire or heat sensors was changed to prior to commissioning. This approval was provided verbally from Alvin Greenberg to Susan Strachan on April 23.

- At the April 16, 2026, bi-monthly CEC-GEM compliance meeting, the CEC CPM concurred that the Rock Crusher Safety Program and Concrete Batch Plan Safety Program could be provided prior to the start of cavern construction, similar to the other Worker Safety-1 plans.

Verification language changes consistent with the CPM's approvals for Worker Safety-1 and Worker Safety-11 are included in Attachment A of this MCR.

Verification Language Changes to Civil-1, GEN-2, GEN-4, and GEN-5. In June 2026, the DCBO agreed to the following Verification language timing modifications for the following the Facility Design conditions:

- Civil-1: The Verification timing was modified from prior to site grading to prior to the start of the October 1, 2026, rainy season for the Early Works area and 15 days prior to start of site grading for the Later Works area.
- GEN-2: The Verification timing was modified to add the timing for when Later Works area packages should be submitted.
- GEN-4: The Verification timing was modified to better reflect when the resume for the Resident Engineer is needed.
- GEN-5: The Verification timing was modified to better reflect when the resumes for the engineers are needed.

The full text of the CoCs with the Verification language changes consistent with the DCBO's verification approvals are included in Attachment A of this MCR.

Verification Language Changes to BIO-24, CUL/TRI-2, LAND-2, PAL-2, TRANS-1, WATER-1. On July 21, 2026, the CPM approved Verification language timing modifications to the following conditions:

- BIO-24: The Verification timing was modified so the compliance submittal was due 45 days prior to construction rather than site mobilization. In addition, additional language was added to recognize that a separate submittal will be made for the gen-tie line.
- CUL/TRI-2: The Verification timing was modified to enable the information to the CRS to be provided prior to Early Works grading rather ground disturbance.
- LAND-2: The Verification timing was modified to specify that separate construction site plans would be submitted for Early Works, Late Works, and the gen-tie line.
- PAL-2: The Verification timing was modified to enable the information to the PRS to be provided prior to Early Works grading rather ground disturbance.
- TRANS-1: The Verification timing was modified to reflect that two Traffic Management Plans will be submitted, one for the site and one for the gen-tie line.
- WATER-1: The Verification timing was modified from prior to site grading to prior to the start of the October 1, 2026, rainy season for the Early Works area and 15 days prior to start of site grading for the Later Works area.

The full text of the CoCs with the approved Verification language changes are included in Attachment A of this MCR.

Verification Language Change to SOCIO-2. On August 5, the CPM approved a Verification language change to Condition SOCIO-2 modifying when proof of payment of the school facility development fee must be submitted from "at least 30 days prior to construction" to "at least 30 days prior to at least 30 days prior to the start of construction of inhabitable offices and buildings."

Clarifications on Controlled Detonations. Following a March 5, 2026, meeting with CEC Staff, on March 16, 2026, GEM submitted a written request for confirmation that controlled detonations could occur in a 24-hour cycle year-round starting from 100 feet below surface. The written request was reviewed during meetings with the CEC CPM team's subject matter experts on March 19th and April 23rd.

A technical memorandum on the controlled detonation approach was submitted on April 17th, responding to CEC questions from the March 19th meeting. As explained at the March 19th and April 23rd meetings and in the technical memorandum, the first 100 feet of subsurface excavations for the air shaft construction will be dug using mechanical excavators, without use of any detonation for this initial depth. Based on this detail and the supporting technical discussions with

subject matter experts, the CEC CPM confirmed that CoCs BIO-7 ("General Impact Avoidance and Minimization Measures") and NOISE-6 ("Construction Noise Restrictions") and Worker Safety-5 ("Project Controlled Detonations Plan") allow controlled detonations to occur in a 24-hour cycle year-round starting from 100 feet below surface. CEC CPM authorization was received via email on March 18th for NOISE-6, April 21st for BIO-7, and April 23rd for Worker Safety-5. In addition, CEC Biology Staff confirmed that they will at their discretion monitor some of the initial detonations at the shallowest depth to confirm the activities are conducted consistent with the authorization.

Clarification on Worker Safety-11, Construction Water Supply. Condition Worker Safety-11 requires that a fire water flow of at least 1,500 gallons per minute be provided. On April 28, 2026, the DCBO clarified that for construction, 60,000 gallons of fire water storage is required.

8. Other Governmental Agency Filings and Submittals

Table 3 identifies meetings and compliance documents submitted to other governmental agencies during the reporting period.

Table 3: Other Governmental Agency Meetings and Submittals During Reporting Period

Government Agency	File/Permit/Engagement	Date
Kern County Department of Planning and Natural Resources	The Kern County Department of Planning and Natural Resources requested that GEM prepare a compliance binder which includes submittals to the Planning and Natural Resources Department, as well as other County departments to which compliance submittals are sent. During the reporting period, the compliance binder was updated with compliance submittals provided to the Planning and Natural Resources Department in compliance with Conditions LAND-1 LAND-2, TRANS-1, and COM-7.	Aug. 13, 17 & 20,
CalTrans	A CalTrans email was received which stated that an encroachment permit for the Dawn Road improvements for construction is not required.	August 13, 2026
Kern County Public Works Department	An application for Granite Construction to install Traffic Control Signs was submitted.	August 28, 2026

9. Compliance Activities to Be Conducted in August/September 2026

It is anticipated that the following compliance documents will be submitted over the next two months.

- BIO-13: Crotch's Bumble Bee Survey Report
- BIO-15: Special Status Reptile Species Survey Report
- BIO-16: Desert Tortoise Survey Report
- BIO-22: American Badger, Desert Kit Fox, and Ringtail Survey Report
- BIO-24: Engineering drawings and other information included in CEC's September 9 BIO-24 comments
- CUL/TRI-3: Final CRMIMP
- GEN-2: Master Drawing and Specification List for Later Works activities
- Worker Safety-1: Revised Construction Fire Prevention Plan

10. New Additions to the On-Site Compliance File

Electronic copies of the approved condition compliance documents have been shared with contractors. Hard copy binders with the approved condition compliance submittals will be located on-site by mid-September. Compliance submittals will be added to the binders as they are approved.

11. Incidents and Corrective Actions

There were no incidents or corrective actions during the reporting period.

ATTACHMENT A

Approved Condition Verification Language Changes

Worker Safety CEC Staff Approved Verification Changes, March 2026

WORKER SAFETY-1:

Verification: At least 90 days prior to the start of construction, the project owner shall submit to the CPM for review and approval a copy of the following plans as part of the Project Construction and Safety and Health Program: a Construction Personal Protective Equipment Program; a Construction Injury and Illness Prevention Program; a Construction Emergency Action Plan; an Emergency Response Plan; and a Construction Fire Prevention Plan for aboveground activities. The Hazardous Material Business Plan (HMBP) and Spill Prevention, Control and Countermeasure Plan (SPCC) will be submitted pursuant to Condition HAZ-1

At least 90 days prior to the start of cavern construction, the project owner shall submit to the CPM for review and approval: the Construction Exposure Monitoring Plan, Mining Safety & Health Plan, a Rock Crusher Safety Program; a Concrete Batch Plan Safety Program; and a Construction Fire Protection Plan for underground activities.

At the same time the plans are submitted to the CPM, the project owner shall also provide ~~to the CPM~~ a copy of the letters requesting comments submitted to KCFD and Kern County Sheriff's Office (KCSO). Written responses from the KCFD and KCSO, if any, detailing resolved comments shall be submitted to the CPM within 30 days of receipt

WORKER SAFETY-11:

Verification: At least 60 days prior to the starting of construction, the project owner shall provide all the information required for Items 3, 5, and 7 above to the KCFD for review and comment, to the CPM for review and approval, and to the DCBO for plan check approval and construction inspection.

At least 60 days prior to the starting of cavern construction, the project owner shall provide all the information required for Items 6, 8 and 9 above to the KCFD for review and comment, to the CPM for review and approval, and to the DCBO for plan check approval and construction inspection. The project owner shall also schedule, after consultation and agreement of all parties involved, the pre-cavern construction and excavation conference at least 60 days prior to the start of cavern excavation and shall give the CPM at least 30 days written notice of the meeting.

At least 60 days prior to commissioning, the project owner shall provide documentation demonstrating that the remote fire or heat sensors at sufficient locations to cover the entire facility (Item 2) have been installed.

At least 60 days prior to project operations, ~~T~~the project owner shall ~~also~~ provide a letter to the CPM stating that the KCFD, CHP, and KCSO have been given access to the Knox boxes (Item 1) and affirming that the closed-circuit television cameras (Item 4) have been installed.

Facility Design Conditions DCBO Approved Verification Changes, June 2026

CIVIL-1

The project owner shall submit to the DCBO for review and approval the following:

1. Design of the proposed drainage structures and the grading plan;
2. An erosion and sedimentation control plan;

3. Related calculations and specifications, signed and stamped by the responsible civil engineer; and
4. Soils, geotechnical, or foundation investigations reports required by the 2022 Building Code.

Verification: At least 45~~15~~ days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of the October 1, 2026 rainy season for the Early Works area as defined in Table 1 of MCR No. 4, ~~site grading~~ and 15 days prior to start of site grading for the Later Works area, as defined in Table 1 of MCR No. 4, the project owner shall submit the documents described above to the DCBO for design review and approval. In the next MCR following the DCBO's approval, the project owner shall submit a written statement certifying that the documents have been approved by the DCBO.

GEN-2
Before submitting the initial engineering designs for DCBO review, the project owner shall furnish the CPM and the DCBO with a schedule of facility design submittals, and master drawings and master specifications list. The master drawings and master specifications list shall contain a list of proposed submittal packages of designs, calculations, and specifications for major structures, systems, and equipment. Major structures, systems, and equipment are structures and their associated components or equipment that are necessary for energy storage and/or power production, costly or time consuming to repair or replace, are used for the storage, containment, or handling of hazardous or toxic materials, or could become potential health and safety hazards if not constructed according to applicable engineering LORS. The schedule shall contain the date of each submittal to the DCBO. To facilitate audits by the CEC staff, the project owner shall provide specific packages to the CPM upon request.

Verification: At least 60 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of Early Works rough grading for the Early Works packages and 60 days prior to rough grading for the Later Works packages (or a project owner and DCBO mutually agreed upon alternative time frame), the project owner shall submit to the DCBO and to the CPM the schedule, and the master drawings and master specifications list of documents to be submitted to the DCBO, for review and approval. These documents shall be the pertinent design documents for the major structures, systems, and equipment defined above in Condition of Certification **GEN-2**. Major structures, systems, and equipment shall be added to or deleted from the list only with CPM approval. The project owner shall provide schedule updates in the monthly compliance report (MCR).

GEN-4
Prior to the start of rough grading, the project owner shall assign a California-registered architect, or a structural or civil engineer, as the resident engineer in charge of the project.

The resident engineer may delegate responsibility for portions of the project to other registered engineers. Registered mechanical and electrical engine may be delegated responsibility for mechanical and electrical portions of t project, respectively. A project may be divided into parts, provided that each part is clearly defined as a distinct unit. Separate assignments of general responsibility may be made for each designated part.

The resident engineer shall:

1. Monitor progress of construction work requiring DCBO design revie and inspection to ensure compliance with LORS;

2. Ensure that construction of all facilities subject to DCBO design review and inspection conforms in every material respect to applicable LOR these Conditions of Certification, approved plans, and specifications

3. Prepare documents to initiate changes in approved drawings and specifications when either directed by the project owner or as required by the conditions of the project;

4. Be responsible for providing project inspectors and testing agencies with complete and up-to-date sets of stamped drawings, plans, specifications, and any other required documents;

5. Be responsible for the timely submittal of construction progress rep to the DCBO from the project inspectors, the contractor, and other engineers who have been delegated responsibility for portions of the project; and

6. Be responsible for notifying the DCBO of corrective action or the disposition of items noted on laboratory reports or other tests when they do not conform to approved plans and specifications.

The resident engineer (or their delegate) must be located at the project site or be available at the project site within a reasonable time, during any hours in which construction takes place.

The resident engineer shall have the authority to halt construction and to require changes or remedial work if the work does not meet requirements.

If the resident engineer or the delegated engineers are reassigned or replaced, the project owner shall submit the name, qualifications, and registration number of the newly assigned engineer to the DCBO for review and approval. The project owner shall notify the CPM of the DCBO's approval of the new engineer.

Verification: At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of Later Works rough grading, the project owner shall submit to the DCBO for review and approval, the resume and registration number of the resident engineer and any other delegated engineers assigned to the project. The project owner shall notify the CPM of the DCBO's approvals of the RE and other delegated engineer(s) within five days of the approval.

If the resident engineer or the delegated engineer(s) is subsequently reassigned or replaced, the project owner shall within five days submit the name, qualifications, and registration number of the newly assigned engineer to the DCBO for review and approval. The project owner shall notify the CPM of the DCBO's approval of the new engineer within five days of the approval.

GEN-5

Prior to the start of rough grading, the project owner shall assign at least one of each of the following California registered engineers to the project: a civil engineer; a soils, geotechnical, or civil engineer experienced and knowledgeable in the practice of soils engineering; and an engineering geologist. Prior to the start of construction, the project owner shall assign at least one of each of the following California registered engineers to the project: a design engineer who is either a structural engineer or a civil engineer fully competent and proficient in the design of

project structures and equipment supports; a mechanical engineer; and an electrical engineer. (California Business and Professions Code, sections 6704, 6730, 6731, and 6736 require state registration to practice as a civil engineer or structural engineer in California.)

The tasks performed by the civil, mechanical, electrical, or design engineers may be divided between two or more engineers, as long as each engineer is responsible for a particular segment of the project (for example, proposed earthwork, civil structures, project structures, equipment support). No segment of the project shall have more than one responsible engineer. The transmission line may be the responsibility of a separate California registered electrical engineer.

The project owner shall submit to the DCBO for review and approval, the names, qualifications, and registration numbers of all responsible engineers assigned to the project.

If any one of the designated responsible engineers is subsequently reassigned or replaced, the project owner shall submit the name, qualifications and registration number of the newly assigned responsible engineer to the DCBO for review and approval. The project owner shall notify the CPM of the DCBO's approval of the new engineer.

1. The civil engineer shall:
    a. Review the foundation investigations, geotechnical, or soils reports prepared by the soils engineer, the geotechnical engineer, or by a civil engineer experienced and knowledgeable in the practice of soils engineering;
    b. Design (or be responsible for the design of), stamp, and sign all plans, calculations, and specifications for proposed site work, civil works, and related facilities requiring design review and inspection by the DCBO. These include, but may not be limited to grading, site preparation, excavation, compaction, construction of secondary containment, foundations, erosion and sedimentation control structures, drainage facilities, underground utilities, culverts, site access roads, and sanitary sewer systems; and
    c. Provide consultation to the resident engineer during the construction phase of the project and recommend changes in the design of the civil works facilities and changes to the construction procedures.

2. The soils engineer, geotechnical engineer, or civil engineer experienced and knowledgeable in the practice of soils engineering, shall:
    a. Review all the engineering geology reports;
    b. Prepare the foundation investigations, geotechnical, or soils reports containing field exploration reports, laboratory tests, and engineering analysis detailing the nature and extent of the soils that could be susceptible to liquefaction, rapid settlement, or collapse when saturated under load;
    c. Be present, as required, during site grading and earthwork to provide consultation and monitor compliance with requirements set forth in the 2022 Building Code (depending on the site conditions, this may be the responsibility of either the soils engineer, the engineering geologist, or both); and
    d. Recommend field changes to the civil engineer and resident engineer.
    e. This engineer shall be authorized to halt earthwork and to require changes if site conditions are unsafe or do not conform to the predicted conditions used as the basis for design of earthwork or foundations.

3. The engineering geologist shall:
   a. Review all the engineering geology reports and prepare a final soil grading report; and
   b. Be present, as required, during site grading and earthwork to provide consultation and monitor compliance with the requirements set forth in the 2022 Building Code (depending on the site conditions, this may be the responsibility of either the soils engineer, the engineering geologist, or both).

4. The design engineer shall:
   a. Be directly responsible for the design of the proposed structures and equipment supports;
   b. Provide consultation to the RE during design and construction of the project;
   c. Monitor construction progress to ensure compliance with engineering LORS;
   d. Evaluate and recommend necessary changes in design; and
   e. Prepare and sign all major building plans, specifications, and calculations.

5. The mechanical engineer shall be responsible for, and sign and stamp a statement with, each mechanical submittal to the DCBO, stating that the proposed final design plans, specifications, and calculations conform to all of the mechanical engineering design requirements set forth in the CEC's decision.

6. The electrical engineer shall:
   a. Be responsible for the electrical design of the project; and
   b. Sign and stamp electrical design drawings, plans, specifications, and calculations.

Verification: At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of Later Works rough grading, the project owner shall submit to the DCBO for review and approval, resumes and registration numbers of the responsible civil engineer, soils (geotechnical) engineer, and engineering geologist assigned to the project.

At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of Later Works construction, the project owner shall submit to the DCBO for review and approval, resumes and registration numbers of the responsible design engineer, mechanical engineer, and electrical engineer assigned to the project.

The project owner shall notify the CPM of the DCBO's approvals of the responsible engineers within five days of the approval.

If any one of the designated responsible engineers is subsequently reassigned or replaced, the project owner shall within five days submit the name, qualifications, and registration number of the newly assigned responsible engineer to the DCBO for review and approval. The project owner shall notify the CPM of the DCBO's approval of the new engineer within five days of the approval.

Environmental Conditions CEC Approved Verification Changes, July 2026

BIO-24 (Full condition not included due to length and no submittal timing is specified in the Condition)
Verification: The project owner shall provide the updated Jurisdictional Report that clearly delineates all proposed permanent and temporary impacts, the proposed engineering drawings for each crossing type, and the hydrologic studies used to inform the engineering design to the CPM for review and approval no less than 45 days prior to construction ~~site mobilization~~. The project owner shall provide Final Reports and Plans to the CPM and the CDFW no later than 14 days prior to the installation of any engineered crossing, bridge, or new culvert.

A separate updated Jurisdictional Report shall be provided 45-days prior to construction of the gen-tie line.

CUL-2/TRI-2
INFORMATION TO BE PROVIDED TO THE CRS
Prior to the start of ground disturbance, the project owner shall provide the CRS with copies of the application for certification (AFC), data responses, confidential cultural resources reports, all supplements, the cultural and tribal cultural resources section from the CEC's Final Staff Assessment (FSA), and the **Cultural and Tribal Cultural Resources** Conditions of Certification from the CEC's Final Decision for the project, if the CRS does not already possess copies of these materials. The project owner shall also provide the CRS and the CPM with maps and drawings showing the footprints of the power plant, all linear facility routes, all access roads, and all laydown areas. Maps shall include the appropriate United States Geological Survey quadrangles and a map at an appropriate scale (e.g., 1:24,000 and 1 inch = 200 feet, respectively) for plotting cultural features or materials. If the CRS requests enlargements or strip maps for linear facility routes, the project owner shall provide copies to the CRS and CPM. The CPM shall review map submittals and, in consultation with the CRS, approve those that are appropriate for use in cultural resources planning activities. No ground disturbance shall occur prior to CPM approval of maps and drawings unless such activities are specifically approved by the CPM. Maps shall include any cultural and tribal cultural resources, including any historic built environment resources, identified in the FSA's project area of analysis (PAA). If construction of the project would proceed in phases, maps and drawings not previously provided shall be provided to the CRS and CPM prior to the start of each phase. Written notice identifying the proposed schedule of each project phase shall be provided to the CRS and CPM.

Weekly, until ground disturbance is completed, the project construction manager shall provide to the CRS and CPM a schedule of project activities for the following week, including the identification of area(s) where ground disturbance will occur during that week.

The project owner shall notify the CRS and CPM of any changes to the scheduling of the construction phases.

The project owner shall provide the documents described in the first paragraph of this condition to the new CRS if the approved CRS is terminated or resigns.

Verification: At least 15 days prior to the start of Early Works grading, (or a project owner and CPM mutually agreed upon alternative time frame) ~~ground disturbance~~, the project owner shall provide the CPM notice that the AFC, data responses, confidential cultural resources documents, all supplements, FSA, and Final CEC Decision have been provided to the CRS, if needed, and the subject maps and drawings to the CRS and CPM. The CPM will review submittals in consultation with the CRS and approve maps and drawings suitable for cultural resources planning activities.

At least 5~~15~~ days prior to the start of Early Works grading, (or a project owner and CPM mutually agreed upon alternative time frame) ~~ground disturbance~~, if there are changes to any project-related footprint, the project owner shall provide revised maps and drawings for the changes to the CRS and CPM.

At least 15 days prior to the start of each phase of a phased project (or a project owner and CPM mutually agreed upon alternative time frame), the project owner shall submit the appropriate maps and drawings, if not previously provided, to the CRS and CPM.

Weekly, during ground disturbance, a schedule of the next week's anticipated project activity shall be provided to the CRS and CPM by letter, e-mail, or fax.

LAND-2

Prior to any grading or development for the permanent project facilities under CEC jurisdiction (including the Willow Rock Energy Storage Center, gen-tie line, and optional architectural berm) the project owner shall develop ~~a~~ construction site plans (including the temporary rock crushing facility and concrete batch plant) and operation site plans (including the optional architectural berm) and submit it to the Kern County Planning and Natural Resources Department for review and comment, and to the CPM for approval, to ensure compliance with local regulations, including conditions required by the ALUCP. The project owner shall adhere to CPM-approved site plans during construction and operation and ensure that local regulations are complied with during construction and operation of the permanent project facilities.

Verification: At least 60 days prior to any grading or development for permanent project facilities under CEC jurisdiction (or a project owner and CPM mutually agreed upon alternative time frame) (including the Willow Rock site, gen-tie line, and a potential architectural berm), for each project phase (Early Works, Later Works, and the gen-tie line), the project owner shall submit proposed site plans for these facilities to the Kern County Planning and Natural Resources Department for review, comment, and approval, and to the CPM for review and approval. The project owner shall provide any review comments from Kern County to the CPM at least 30 days prior to any grading or development for these permanent project facilities~~.~~ (or a project owner and CPM mutually agreed upon alternative time frame).

Separate construction site plans shall be submitted for Early Works, Later Works, and the gen-tie line prior to grading or development for the permanent project facilities for each phase.

PAL-2

The project owner shall provide the PRS and the CPM, for review and approval, maps and drawings showing the footprint of the power plant, construction laydown areas, and all

related facilities. Maps shall identify all areas of the project where ground disturbance is anticipated. If the PRS requests enlargements or strip maps for linear facility routes, the project owner shall provide copies to the PRS and CPM. The site grading plan and the plan and profile drawings for the utility lines would be acceptable for this purpose. The plan drawings must show the location, depth, and extent of all ground disturbances and be at a scale between 1 inch = 40 feet (1:480) and 1 inch = 100 feet (1:1,200). If the footprint of the project or its linear facilities change, the project owner shall provide maps and drawings reflecting those changes to the PRS and CPM.

If construction of the project proceeds in phases, maps and drawings may be submitted prior to the start of each phase. A letter identifying the proposed schedule of each project phase shall be provided to the PRS and CPM. Before work commences on affected phases, the Project owner shall notify the PRS and CPM of any construction phase scheduling changes.

At a minimum, the project owner shall ensure that the PRS or PRM consults weekly with the project superintendent and construction field manager to confirm area(s) to be worked the following week, until ground disturbance is completed.

Verification: At least 15 ~~30~~ days prior to the start of Early Works grading, (or a project owner and CPM mutually agreed upon alternative time frame) ~~ground disturbance~~, the project owner shall provide maps and drawings to the PRS and CPM for review and approval.

If there are planned changes to the footprint of the project, revised maps and drawings shall be provided to the PRS and CPM at least 5~~15~~ days prior to the start of grading, (or a project owner and CPM mutually agreed upon alternative time frame) ~~ground disturbance~~.

TRANS-1
Prior to the start of construction, the project owner shall prepare Construction Traffic Management Plan (CTMP). The CTMP shall address the movement of workers, vehicles, equipment, and materials, including arrival and departure schedules, carpooling, a parking/staging plan, and designated workforce and delivery routes. Traffic control plans shall be prepared as necessary to address construction staging, as well as any roadway or lane closures and shall include any signage or roadway lighting improvements deemed necessary during construction. The CTMP shall address means of access for emergency vehicles to the project site, as well as means of maintaining access to any adjacent residential and commercial property during the construction and maintenance of the project.

The CTMP shall include procedures to restore damage to existing roadways caused by project construction traffic, including corresponding traffic index calculations. The construction contractor shall work with Kern County and Caltrans to prepare a schedule and mitigation plan for the roadways along construction routes, in accordance with the procedures established by the CTMP.

The CTMP shall include measures to ensure safe ingress and egress at the project access intersections. Measures may include removal of vegetation to provide unobstructed line of sight, addition of advanced warning signs, and active work zone traffic control/traffic

management as approved by the CPM. The CTMP shall also be submitted to Kern County and Caltrans for review and comment.

Verification: At least 60 calendar days prior to the start of construction, for the project site and 60 calendar days prior to the start of construction for the gen-tie line, the project owner shall submit the each CTMP to Kern County, Caltrans, and California Highway Patrol (CHP) for review and comment and to the CPM for review and approval. The project owner shall also provide the CPM with a copy of the transmittal letters to Kern County, Caltrans, and CHP requesting review and comment.

The CTMPs shall include transportation demand management (TDM) measures to reduce project-generated VMT during construction. The CTMP shall outline VMT reduction measures, which may include, by way of example, the following:

- Provide information regarding lodging for specialized workers about lodging options close to the site.
- Create or promote existing carpooling programs to encourage employees to carpool.
- Offer a shuttle service for employees with pick-up points at nearby hotels housing specialized workers or park-and-ride lots.

At least 30 calendar days prior to the start of construction for the project site and 30 calendar days prior to the start of construction for the gen-tie line, the project owner shall provide copies of any comment letters received from Kern County, Caltrans, CHP, or any other interested agencies, along with any changes to the CTMP, for CPM review and approval. After CPM review and approval, the project owner shall provide completed copies of the final CTMPs to Kern County, Caltrans, CHP, and any other interested agencies, sending copies of the correspondence to the CPM.

WATER-1
(Condition not included due to length and no submittal timing is specified in the Condition)

Verification: No later than forty-five (45) ~~thirty (30)~~ days prior to start of the October 1, 2026 rainy season, (or a project owner and CPM mutually agreed upon alternative time frame) ~~site mobilization~~, the Project owner shall submit a copy of the final DESCP to the CPM for review and to Kern County and the Lahontan RWQCB if required. The CPM shall consider comments if received by the county and RWQCB before approval of the DESCP. The DESCP shall be consistent with the grading and drainage plan as required by Condition of Certification **CIVIL-1**, and relevant portions of the DESCP shall clearly show approval by the chief building official. The Project owner shall provide in the Monthly Compliance Report with a narrative on the effectiveness of the drainage, erosion, and sediment-control measures and the results of monitoring and maintenance activities. Once operational, the Project owner shall update and maintain the DESCP for the life of the Project and shall provide in the annual compliance report information on the results of monitoring and maintenance activities.

A separate DESCP shall be submitted for the Later Works area no later than thirty (30) days prior to the start of Later Works grading (and no later than thirty (30) days prior to the start of construction of the gen-tie line (or a project owner and CPM mutually agreed upon alternative time frame).

SOCIO-2

The project owner shall pay the current one-time statutory school facility development fee to Mojave Unified School District as authorized by Education Code Section 17620 and the Mojave Unified School District Board Policy BP 7211 Facilities: Developer Fees.

Verification: At least 30 days prior to the start of construction of inhabitable offices and buildings, the project owner shall provide to the CPM proof of payment to the Mojave Unified School District of the statutory development fees.

ATTACHMENT B

WRESC PRE-CONSTRUCTION COMPLIANCE MATRIX

WRESC Construction Compliance Matrix as of 9/10/26

Color code:

Must clear for Full NTP
Submitted to CEC/Agency
Complete/Approved

Key Milestones:

8/19/26	Early Works Site Mobilization as authoritized by LNTP#2
8/19/26	Start Grading of Dawn Road, subsurface pad, laydown area, internal roads, parking
9/15/26	Receive Full NTP
8/24/26	Start Dawn Road Improvements
8/24/26	Start Grading (subsurface pad, laydown area, internal roads, parking)
10/1/26	Start Site Mobilization for Subsurface Construction (air shaft)
11/1/26	Start Pouring Major Foundation Concrete (air shaft hoist)
3/1/27	Start Reservoir Excavation and Site Grading
5/1/2027	Start Vertical Structure Installation (air shaft headframe)
9/1/2027	Start Controlled Detonations
12/1/2028	Start Cavern Construction
3/1/2028	Begin Installation of Major Topside Equipment
10/1/2029	Complete Installation of Major Topside Equipment
5/1/2020	First Plant Synchronization (Startup)
12/1/2027	Start Water Supply Line Connection
6/1/2028	Complete Water Supply Line Connection
12/1/27	Start gen-tie line construction
6/1/29	Complete gen-tie line construction
11/1/29	Energization and interconnection tests
7/1/2029	Start Filling Reservoir
1/1/2030	Complete Filling Reservoir

1/1/2030 COD Commences
1/1/30 All construction complete including landscaping

Condition of Certification *(page in FD)*	Summary of WRESC Compliance Requirement (always refer to Appendix A for full language)	Verification Language/Action/Submittal Required by Compliance Requirement	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date Submitted to CPM/DCBO/ Agency	Notes/Status
AQ-SC1 *(p. A-21)*	Air Quality Construction Mitigation Manager (AQCMM): The project owner's AQCMM and AQCMM Delegates shall have full access to all areas of construction on the project site and shall have the authority to stop any or all construction activities as warranted by applicable construction mitigation conditions.	The AQCMM and AQCMM Delegates may have other responsibilities in addition to those described in this condition.	Ongoing during construction	WSP with input from Granite	N/A		
AQ-SC3 *(p. A-22)*	Construction Fugitive Dust Control: The AQCMM shall submit documentation to the CPM in each Monthly Compliance Report (MCR) that demonstrates compliance with the Air Quality Construction Mitigation Plan (AQCMP) for the purposes of minimizing fugitive dust emission creation from construction activities and preventing all fugitive dust plumes that would not comply with the performance standards identified in AQ-SC4 from leaving the project site. Any deviation from the AQCMP mitigation measures shall require prior CPM notification and approval.	**AQCMM to report monthly on all of the 21 fugitive dust mitigation measures set forth in the condition.** The MC will include a summary of all actions taken to maintain compliance with the condition and copies of any complaints or any other documentation deemed necessary by the CPM and AQCMM to verify compliance with this condition.	Monthly in the MCR	WSP with input from Granite	by 10th of each month		

AQ-SC4 *(p. A-25)*	Dust Plume Response Requirement: The AQCMM or AQCMM Delegate shall monitor all construction activities for visible dust plumes. Observations of visible dust plumes that have the potential to be transported (A) off the project site and within 400 feet upwind of any regularly occupied structures not owned by the project owner or (B) 200 feet beyond the centerline of the construction of linear facilities indicate that existing mitigation measures are not resulting in effective mitigation. **The AQCMM or an AQCMM Delegate shall implement STEPS 1-3 set forth in the condition if visible dust plumes as defined above are observed.**	The AQCMM shall provide the CPM a MCR that includes: a) a summary of all actions taken to maintain compliance with the condition; b) copies of any complaints or any other documentation deemed necessary by the CPM and AQCMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.	Monthly in the MCR	WSP with input from Granite	by 10th of each month		
AQ-SC5 *(p. A-26)*	Diesel-Fueled Engine Control: The AQCMM shall submit a monthly construction mitigation report to the CPM that demonstrates compliance with the AQCMP mitigation measures for purposes of controlling diesel construction-related emissions. Any deviation from the AQCMP mitigation measures shall require prior and CPM notification and approval. The following off-road diesel construction equipment mitigation measures shall be included in the Air Quality Construction Mitigation Plan (AQCMP) required by AQ-SC2 ***(see Items 1-8 listed on pages A-26 through A-28 in Appendix A to the Final Decision).***	The monthly report will include a) a summary of all actions taken to control diesel construction related emissions; b) a list of all heavy equipment used on site during that month, including the owner of that equipment and a letter from each owner indicating that equipment has been properly maintained; and c) any other documentation deemed necessary by the CPM, and the AQCMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.	Monthly in the MCR	WSP with input from Granite	by 10th of each month		
AQ-SC6 *(p. A-28)*	New Source Review Permits: The project owner shall provide the CPM copies of any EKAPCD issued Authority to Construct (ATC) and Permit to Operate (PTO) for the facility. The project owner shall submit to the CPM for review and approval any modification proposed by the project owner to any project air permit. The project owner shall submit to the CPM any modification to any permit proposed by the EKAPCD or U.S. Environmental Protection Agency (USEPA), and any revised permit issued by the EKAPCD or USEPA, for the project.	The project owner shall submit any ATC, PTO, or proposed air permit modification to the CPM. The project owner shall submit all modified air permits to the CPM.	ATC/PTO/permit modifications: within 5 working days of its submittal either by 1) the project owner to an agency, or 2) receipt of proposed modifications from an agency Modified air permits: within 15 days of receipt	Hydrostor	As required		

AQMD Compliance Conditions (EKAPCD 2024)	EKAPCD conditions AQ-1 through AQ-18 apply to each unit of equipment, and the proposed facility as a whole: **0570001-003**: 2,500-kW Kohler emergency generator set model KD2500, driven by 3,621-bhp Liebherr Machines Bulle Model KD62V12-6CNS, EPA Certified (Tier 4) diesel fueled piston engine with turbocharger, after cooler, and Selective Catalytic Reduction (SCR). (EPA family PLHAL103.ESP and S/N TBD.) **0570004:** Emergency fire pump, driven by 460-bhp Cummins Model QSX15, EPA Certified (Tier 3) diesel fueled piston engine with turbocharger and after cooler. (EPA family RCEXL015.AAH and S/N TBD.) [Conditions AQ-4 through AQ-18 relate to operations and are included in the WRESC Operations Matrix.]						
AQ-1 ***(p. A-29)***	Engine shall be equipped with turbocharger and charge air cooler (Rule 210.1 BACT Requirement)	The project owner shall make the site available for inspection of records by representatives of the District, CARB, and the CEC.	Ongoing during construction	Granite	As required		
AQ-2 **(p. A-29)**	Elapsed time meter shall be installed and maintained indicating cumulative hours of engine operating time. (Rule 210.1.)	The project owner shall make the site available for inspection of records by representatives of the District, CARB, and the CEC.	Ongoing during construction	Granite	As required		
AQ-3 **(p. A-30)**	Engine shall be equipped with a permanently affixed placard readily available for inspection with the following engine information: brake horsepower, make, model, serial number, and Tier number. (Rule 210.1.)	The project owner shall make the site available for inspection of records by representatives of the District, CARB, and the CEC.	Ongoing during construction	Granite	As required		
BIO-1 ***(p. A-53)***	Designated Biologist Selection: If a Designated Biologist (DB) needs to be replaced, the specified information regarding the proposed replacement must be submitted to the CPM. In an emergency, the project owner shall immediately notify the CPM to discuss the qualifications and approval of a short-term replacement while a permanent DB is proposed to the CPM for consideration.	Submit the specified information for the new DB to the CPM for approval	at least 10 working days prior to the termination or release of the preceding DB	WSP	As required		
BIO-2(a) ***(p. A-54)***	DB Duties: **Refer to Items 1-15 in the Condition** for a list of the duties the DB is to perform during any site (or related facilities) mobilization, ground disturbance, grading, and construction as required by the BRMIMP.	Submit in the MCR copies of all DB written reports and summaries that document construction activities that have the potential to affect biological resources. The DB's written records will be made available for the CPM's inspection on request anytime during business hours.	Monthly in the MCR prepared by Hydrostor	WSP	by 10th of each month		

BIO-2(b) ***(p. A-54)***	If no DB is available at any time during the life of the project (including operation phase) and the CPM determines that project-related actions may affect biological resources, the CPM may direct the project owner to assign a replacement DB, for short-term or long-term monitoring and reporting.	The DB may be assisted by the approved BM(s) but remains the primary contact for the project owner and CPM.	As necessary	WSP	As required		
BIO-3(a) ***(p. A-57)***	BMs Selection: If additional BMs are needed during construction or for species specific surveys, the specified information shall be submitted to the CPM for approval.	If additional BMs are needed during construction or for species specific surveys, the specified information shall be submitted to the CPM for approval.	at least 10 days prior to their first day of monitoring activities	WSP	As required		
BIO-3(b) ***(p. A-57)***	Any new Biologtical Monitors shall be trained by the DB.	The DB shall submit a written statement to the CPM confirming that individual Biological Monitors have been trained, including the date when the training was completed.	Within 10 days of completion of training	WSP	As required		
BIO-4 ***(p. A-57)***	DB and BM Authority. If required by the DB and/or BM's, the project owner's construction manager shall halt all site mobilization, ground disturbance, grading, and construction.	The DB or BM shall notify the project owner and the CPM of any work stoppage and associated non-compliance incidents. Notifications shall occur immediately and no later than the following morning, or Monday morning in the case of a weekend, or the next business day in the case of a state or federal holiday. The project owner shall notify the CPM of the circumstances and actions being taken to resolve.	As necessary within 1 working day of initiating the corrective action	WSP with input from Granite	As required		

BIO-5 *(p. A-58)*	Worker Environmental Awareness Training. The WEAP shall be administered to all onsite personnel who will enter the project site during site mobilization, vegetation clearing, preconstruction, and construction, including but not limited to surveyors, construction engineers, employees, contractors, contractor's employees, supervisors, inspectors, subcontractors (but excluding delivery personnel), biologists, cultural, tribal, and paleontological monitors. A WEAP Light can be provided to vendors, such as delivery personnel (e.g., building materials, concrete, heavy equipment, etc.), who periodically enter the project site and are limited to areas such as existing access roads and/or lay down areas.	Provide the number of persons who have completed the training for the prior month and a running total of all persons who have completed the training to date. Training acknowledgement forms signed during construction shall be kept on file by the project owner for at least 6 months after the start of commercial operation.	Monthly in the MCR prepared by Hydrostor	WSP	by 10th of each month		
BIO-6(b)	Develop a Final Biological Resources Implementation and Monitoring Plan as set forth in the condition.	Provide the final BRMIMP to the CPM	At least 10 days prior to start of any site mobilization	WSP	9/1/26		8/14/26: WSP emailed list of 18 items that need to be addressed in revised BRMIMP 8/14/26: Hydrostor emailed acceptance of requested changes to Rev2. 8/19/26: CEC Conditional approval requires revised final plan be submiited to CEC for review and approval to obtain Final NTP 9/4/26: BRMIMP Rev. 3 submitted to CPM.
BIO-6(a) *(p. A-62)*	Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP): Measures #1-16 shall be reported by the DB (e.g., survey results, construction activities that were monitored, non-compliance incidences and resolution, species observed, etc.)	Implementation of the BRMIMP measures shall be reported in the MCRs.	Monthly in the MCR prepared by Hydrostor	WSP	by 10th of each month		
BIO-6(b) *(p. A-62)*	A second set of aerial photos shall be taken subsequent to completion of construction and shall be submitted to the CPM for review and approval and CDFW for review and comment.	Photos, GIS shapefiles, and a final accounting in whole acres of vegetation communities/cover types present before and after construction shall also be provided.	No later than 30 days after completion of construction	WSP	At the completion of construcion		

BIO-6(c)	If any federal permits have not been received when the final BRMIMP is submitted, these permits shall be submitted to the CPM and the BRMIMP revised or supplemented to reflect the permit conditions.	Implementation of the measures shall be reported by Designated Biologist in the Monthly Compliance Reports during construction	Permits: Witin 5 days of receipt Updated BRMIMP: within 10 days of receipt of permits	WSP	As required		
BIO-7(a) *(p. A-65)*	General Impact Avoidance and Minimization Measures: The project owner shall ensure implementation of **the 25 measures set forth in the Condition (**including limiting disturbance areas, minimizing road and traffic impacts, inspection of pipes and trenches to prevent wildlife entrapment, etc.)	Implementation of the measures shall be reported on by the DB in the Monthly Compliance Reports	Monthly in the MCR prepared by Hydrostor	WSP with input from Granite	by 10th of each month		
BIO-7(b) *(p. A-65)*	Reservoir Management Plan: The project owner shall prepare a Reservoir Management Plan prior to construction of the reservoir. See the condition for a list of items which must be addressed in the plan and complied with during construction. **(See specific requirements in Condition).**	Submit the RMP to the CPM for review and approval in consultation with CDFW.	at least 45 days prior to the start of any construction-related activities associated with the reservoir	WSP	1/15/27		
BIO-7(c) *(p. A-70)*	During construction, injured or dead animals detected by personnel in the project area shall be reported immediately to the Designated Biologist and/or Biological Monitor, who shall remove the carcass or injured animal promptly. The DB shall notify the CPM, CDFW, and/or USFWS within 1 working day of receipt of the carcass and follow instructions by the appropriate agency contact. The project owner shall cover the veterinary fees for the treatment of injured wildlife.	Roadkilled species name, physical characteristics (sex, age class, length, weight), and other pertinent information shall be noted and reported in the MCR.	Monthly in the MCR prepared by Hydrostor	WSP	by 10th of each month		
BIO-7(d) *(p. A-72)*	The project owner shall provide to the CPM for review and approval a written construction termination report identifying how WPRP measures have been completed.	Submit to the CPM for review and approval.	Within 30 days after compleition of construction	WSP	11/17/29		Date assumes construction ends on day plant goes commercial
BIO-7(e)	During construction. the project owner shall conduct pesticide management in accordance with standard BMPs. The BMPs shall include non-point source pollution control measures.	The project owner shall use a licensed herbicide applicator and obtain recommendations for herbicide use from a licensed Pest Control Advisor.	During construction phase	WSP with input from Granite	Ongoing during construction		
BIO-8 *(p. A-72)*	Vegetation Management Plan (VMP). Any changes to the approved VMP must be approved by the CPM.	Submit the revised VMP to the CPM for review and approval.	As required	WSP	As required		

BIO-8 ***(p. A-72)***	Vegetation Management Plan (VMP): Quarterly, annual, and final revegetation status reports shall be submitted to the CPM for review and approval	Quarterly (March 31, June 30, Sept 30, Dec 31) and annual (december 31) revegetation status reports shall be submitted to the CPM.	no more than 30 days after each reporting period	WSP	TBD		
BIO-9(a) ***(p. A-77)***	Integrated Weed Management Plan (IWMP): The IWMP sets forth **19 required measures to identify, control, and manage existing and potential weed infestations on the project site**. Any changes to the plan must be approved by the CPM.	Submit any changes to the approved plan to the CPM for review and approval.	If a revised IWMP is prepared	WSP with input from Granite	As required		
BIO-9(b) ***(p. A-78)***	Update the map of weed occurrences at least once per year during construction.	Provide maps to CPM in both ARC-GIS-compatible digital format (e.g. shapefiles and PDF map format.)	Include in annual report during construction	WSP	TBD		
BIO-9(c) ***(p. A-78)***	Notify the CPM if any weed species detected on the project site have not been previously recorded in Kern or LA Counties.	Notify the CPM via email	Within 30 days if any weeds meeting criteria are detected.	WSP	As required		
BIO-9(d) ***(p. A-78)***	A daily log shall be maintained for all vehicle and equipment washing activities stating the location, date, and time, types of equipment , methods used, and personnel present.	The IWMP shall specify a reporting schedule, with no less than one report submitted annually, and shall define the contents of each report and reports shall be submitted by the project owner to document weed control activities, including treatment methods, locations, dates, monitoring results, and effectiveness of control measures.	Annually within 30 days of completion of late season surveys	WSP with input from Granite	TBD		
BIO-9(e) ***(p. A-78)***	An updated herbicide work plan shall be developed based on results of ongoing week surveys and submitted annually.	The IWMP shall specify a reporting schedule, with no less than one report submitted annually, and shall define the contents of each report and reports shall be submitted by the project owner to document weed control activities, including treatment methods, locations, dates, monitoring results, and effectiveness of control measures.	Annually with the annual monitoring report and updated weed location maps.	WSP	TBD		

BIO-10 ***(p. A-82)***	Invasive Species Management Plan (ISMP): The project owner must comply with all provisions **(see Items 1-7 listed in the Condition)** of the Invasive Species Management Plan during the construction phase of the project.	If an invasive species not previously known to occur within the project site is discovered during project activities the project owner or DB shall notify the CPM and CDFW within 24-hours, or by Monday if during the weekend, or by the next business day if during a state or federal holiday. The report shall include photos and a completed Suspect Invasive Species Report.	Ongoing during construction	WSP with input from Granite	Within 24 hours of reportable occurrence		
BIO-11(a) ***(p. A-85)***	During each year of construction (and annually for the life of the project), the project owner shall identify the proposed Special Status Plants survey areas to the CPM for review and approval prior to initiating annual botantical surveys. The survey plan shall identify proposed survey areas and the rationale for any areas not proposed for surveys. The survey plan shall include maps, at an approved scale clearly defining each proposed survey area.	The project owner shall submit the proposed annual survey plan to the COM for review and approval. ~~.~~	The results of each annual survey shall be submitted no more than 45 days after the completion of the surveys.	WSP	TBD		
BIO-11(b) ***(p. A-85)***	Special-Status Plant Avoidance Measures: Annual monitoring and documentation of salvaged plants shall include, but not be limited to, details of plants salvaged, stored, and transplanted (salvage and transplanting locations, species, number, size, condition, etc.); adaptive management efforts implemented (date, location, type of treatment, results, etc.); and evaluation of success of transplantation.	The results of annual monitoring shall be reported in an Annual Monitoring Report specific to salvaged of propagated plants for a minimum of three years. Additional monitoring may be necessary if determined upon review of the annual reports by the CPM that the success criteria are not met.	Annual monitoring plan shall be submitted to the CPM for review and approval no more than 30 days after each reporting period	WSP	TBD		
BIO-12(a) ***(p. A-93)***	The project owner shall conduct an updated Western Joshua Tree census prior to site mobilization for each phase of construction in any areas that were surveyed more than 12 months prior but remained undisturbed, as confirmed in consultation with CDFW. This requirement applies to all project components that will be disturbed, including, but not limited to, the Willow Rock site, the generation tie line, new access roads, laydown areas, staging areas, and other facilities.	Submit the updated Western Joshua Tree Census to the CPM prior to site mobilization and/or construction.	No less than 45 days prior to commencing each phase of construction	WSP	TBD		

BIO-12(b) ***(p. A-93)***	The project owner shall have a DB approved by the CPM oversee all Western Joshua Tree Relocation activities. At the completion of relocation, the project owner shall submit a post-relocation report **containing the information set forth in the Condition**.	The report must be prepared consistent with current CDFW Western Joshua Tree Relocation Guidelines and Protocols (April 2025)	no more than 30 days after relocation is completed	WSP	9/1/26		
BIO-12(c) ***(p. A-93)***	Prepare an annual status report that includes a health assessment of each relocated tree (with unique identifiers), a description of current habitat conditions (including any new disturbances), and representative photos and maps.	Submit the annual status report to the CPM for review and approval, in consultation with CDFW	Annually, by January 31 of the following year.	WSP	1/31/27		
BIO-12(d) ***(p. A-93)***	If a new WJT stem or trunk is detected during construction, the project owner shall submit a Notification of New Stem or Trunk to the CPM and to CDFW for review and comment prior to any project activities that may impact the new WJT.	If a new WJT stem or trunk is detected, the project owner shall submit a Notification of New Stem or Trunk to the CPM and to CDFW for review and comment prior to any project activities that may impact the new WJT. **No impacts may occur until the CPM approves the notification and CDFW has received applicable mitigation fees.**	After the CPM has confirmed the number and size class of individual WJT to be impacted, an invoice for the mitigation fees will be issued	WSP	Critical that any subsequent invoice(s) be paid immediately		
BIO-12(e) ***(p. A-93)***	If dead and or removed WJT are stockpiled on site, they shall not be placed within 50-feet (approximately 15 meters) of a WJT that are being preserved on site, relocated on site, or encroached upon.		As required	WSP	As required		
BIO-12(f) ***(p. A-93)***	Project owner shall conduct a Recurring Assessment of the project site to determine whether any new WJT individuals have emerged.	The Recurring Assessment shall begin six months after the completion of ground-disturbing activities for each phase of project construction and be repeated annually for the duration of construction activities.	Assessment shall begin 6 months after completion of ground disturbing activites for each phase of project construction	WSP	2/27/27		

BIO-12(g) ***(p. A-93)***	Project owner shall ensure no work is conducted within the 50'/25'/10' no-work buffers **as described in the condition** for WJT that will be preserved on site.	The project owner shall mark no-work buffers using fencing, stakes and ropes, or stakes and flagging of a different color than the color used to identify WJT individuals authorized to be taken. If WJT individuals occur in groups, the project owner may mark a single 50-foot (approximately 15-meter) buffer around the entire group, measured from the base of the trunk of the outer-most WJTs.	Any adjustments to the buffer size shall be approved by the CPM, in coordination with CDFW.	WSP with input from Granite	Ongoing during construction		
BIO-12(h) ***(p. A-93)***	The project owner shall maintain the no-work buffer markings for the duration of project construction.	After all construction activities are completed, the project owner must remove all materials used to mark no-work buffers.	After all construction activities are completed	WSP with input from Granite	Ongoing during construction		
BIO-12(i) ***(p. A-93)***	During storm events, the project owner shall not perform trenching activities within 50 feet (approximately 15 meters) of WJT preserved on site or relocated on site, as soils around the root zone of WJT may be more susceptible to erosion during such events. Within at least 12 hours prior to the onset of predicted rain (40 percent chance of rain or more based on the National Weather Service) or immediately upon the onset of unpredicted rain, the project owner shall ensure that all trenching activities are ceased, all associated erosion control measures shall be in place, and all motorized equipment and fueling materials shall be removed from areas where runoff from these items can be reasonably foreseen to come into contact with WJT preserved on site, or relocated on site, or encroached upon.	The project owner shall only perform trenching activities during periods of dry weather (with less than a 40 percent chance of rain), unless approved by the CPM. Trenching halted due to rain may resume when rain ceases. The project owner shall monitor the National Weather Service 72-hour forecast for the project site. Weather forecasts shall be documented and shall be provided upon request by the CPM.	Within at least 12 hours prior to the onset of predicted rain (40 percent chance of rain or more based on the National Weather Service) or immediately upon the onset of unpredicted rain,	WSP with input from Granite	During storm events		

BIO-13(a) ***(p. A-99)***	If a Crotch's bumble bee nest is identified during Colony Active Period Season focused surveys, during ground and/or vegetation disturbing site mobilization or construction activities, or during operation of the project, the project owner shall ensure establishment of a 50-foot no disturbance buffer around each nest. Buffers shall remain in place until the nest has senesced, project activities are complete, or the nest has been relocated in accordance with the Crotch's Bumble Bee Mortality Reduction and Relocation Plan.	The project owner, in consultation with the CPM-approved DB(s) and/or BM(s) shall immediately stop and prohibit all ground disturbing activities within 50 feet of the queen and/or hibernaculum. The project owner shall delineate the 50-foot buffer and notify all workers not to enter the environmentally sensitive area. This buffer may be adjusted with the approval of the CPM based on project activities and potential to disturb the nest. This buffer may	As required	WSP with input from Granite	During Colony Active Period Season		
BIO-13(b) ***(p. A-99)***	If initial ground disturbing construction activities in any given work area occurs during the overwintering season (November 1 through January 31), the DB and/or BM(s) shall conduct overwintering season surveys within areas of suitable habitat (i.e., where vegetation and floral resources occur) in each area planned for project activities .	Conduct the seasonal CBB surveys November 1-January 31 as required in each area planned for project activities.	No more than 10 days in advance of revegation removal or ground disturbance	WSP	Nov 1 - Jan 31		
BIO-13(c) ***(p. A-99)***	Provide results of each CBB survey to the CPM.	Provide the survey report to the CPM for review and approval and to the CDFW for review and comment.	No more than 45 days after completion of the survey	WSP	9/12/26		
BIO-13(c) ***(p. A-99)***	If ground disturbing activities are halted for longer than three days within a work area supporting suitable habitat during the Colony Active Period defined as the Queen Flight Season (February 1 through March 31), the DB and/or BM shall perform a minimum of one additional survey in the work area in accordance with the Crotch's Bumble Bee Mortality Reduction and Relocation Plan prior to reinitiating project activities in the work area.	If a CBB nest is detected during project surveys or any project activities, the project owner shall implement the CBB Mortality Reduction and Relocation Plan unless the nest can be avoided per the CBB Nest Site Buffer measures (Item 6).	prior to reinitiating project activities in the work area	WSP	If nest is detected during project surveys		
BIO-13(d) ***(p. A-99)***	The CPM approved DB(s) and/or BM(s) shall be on-site during all initial ground disturbing site mobilization and/or construction activities in any given work area to visually monitor for Crotch's bumble bee and to detect flight activity.	Visual sweeps of each work area shall occur prior to beginning daily project activities, and a minimum of three times throughout the workday, unless alternate timing is approved by the CPM.	As required	WSP	Ongoing during construction		

BIO-13(e) ***(p. A-99)***	All workers shall inform the CPM-approved DB(s) and/orBM(s) if a Crotch's bumble bee nest is observed within or near a work area during implementation of any project activity, including ground or vegetation disturbing construction or operation activities. If a nest is observed all activities occurring within 50 feet of the nest shall cease and the project owner shall implement a 50-foot no disturbance buffer.	If an overwintering Crotch's bumble bee nest cannot be avoided, then Item 1 (Crotch's Bumble Bee Mortality Reduction and Relocation Plan) shall be implemented.	As required	WSP	Ongoing during construction		
BIO-13(f) ***(p. A-99)***	Prior to any such use of herbicides or pesticides, the project owner shall consult with the CPM and may only use herbicides or pesticides upon the CPM's express written approval for each type of use.	The project owner shall ensure that any herbicide use only occurs when Crotch's bumble bees are dormant, or when flowers within the application area are no longer in bloom, unless authorized by the CPM to control weeds.	Prior to use of any pesticides or herbicides	WSP	Ongoing during construction		
BIO-13(g) ***(p. A-99)***	All Crotch's bumblebee observations should be documented. Survey data shall be submitted to the CNDDB and shall include specifying the type of observation (e.g. individual bee or nest), type of vegetation cover, slope, aspect, GPS location, distance to foraging location (if known), and any other relevant conditions noted. Negative survey results shall also be reported to the CNDDB.	The project owner shall submit information describing the findings of the bumble bee surveys and implementation of any avoidance measures in the Monthly Compliance Report	Monthly in the MCR prepared by Hydrostor	WSP	by 10th of each month		
BIO-14(a) ***(p. A-106)***	Habitat Management Land Acquisition (very detailed condition; refer to Page A-106 for details)	The project owner shall provide verification that the required acquisition, protection and transfer of all HM lands and record any required conservation easements	no later than 18 months from the date of start of site mobilization, even if a security is provided	WSP	1/11/28		Date shown reflects 30 days before 18month due date
BIO-15(a) ***(p. A-115)***	If special-status reptiles (including coast horned lizard and multiple species of legless lizards) are detected the DB and/or BMs shall remain in the work area throughout the duration of activities to ensure that impacts are avoided. If it is not possible to allow the animal to leave the work area on its own, the DB(s) and/or BM(s) shall relocate it to the nearest suitable habitat out of harm's way. Prior to capturing or relocating either species, the most appropriate release location(s) shall be determined in adjacent habitat as close as possible to the capture point.	The project owner or DB(s) shall notify the CPM and CDFW and include info in the MCR.	Notification to the CPM and CDFW within 24 hours if detected. Include in MCR prepared by Hydrostor	WSP	by 10th of each month		

BIO-16(a) *(p. A-117)*	The project owner shall install desert tortoise exclusion fencing around the project site, laydown, staging and parking areas. Exclusion fence specifications shall be approved by the CPM and be consistent with those described in the most recent Desert Tortoise Field Manual or more current guidance provided by CDFW and USFWS.	Install additional DT fencing as required for future phases of the project.	Add to areas not already protected as required	WSP	As required		
BIO-16(b) *(p. A-117)*	Follow-up surveys shall also be conducted within fourteen (14) days preceding additional construction after a gap in significant construction activities of 60 calendar days or more.	Surveys shall include 100 percent of the area disturbed and a surrounding buffer of 200 feet.	As required	WSP	As required		
BIO-16(c) *(p. A-117)*	Desert tortoise are not expected to occur within the project site. If a desert tortoise is detected during construction or operation, and an incidental take is necessary, take authorization shall only be pursued if it is determined by the CPM after consultation with CDFW and USFWS, that such take would not jeopardize the species persistence in the region.		As required	WSP	As required		
BIO-16(d) *(p. A-117)*	A report documenting survey results, including surveyor name(s), date(s) of survey, location (with maps), weather conditions, and any observations or detections of desert tortoise or their sign will be prepared and submitted to the CPM, CDFW, and USFWS. In addition, a monitoring report that includes the location, description, and duration of the activities, any observations or detections of desert tortoise found during the surveys or project activities, and any relocation efforts will be provided during monthly and annual compliance reporting.	Submit the required reports to the CPM, CDFW and USFW.	Monthly in the MCR prepared by Hydrosto Annually in the ACR prepared by Hydrostor	WSP	by the 10th of each month and annually		
BIO-16(e)	The Designated Biologist shall prepare and implement a Raven Management and Reporting Plan consistent with CDFW and USFWS raven management guidelines. As required by BIO-7, Item 18, all trash and food waste will be disposed of in secure, self-closing bins to prevent access by wildlife.	Report active nests to the CPM, CDFW, and USFWS for consideration of authorized management measures.	As required	WSP	As required		
BIO-17(a) *(p. A-120)*	Nest and avian monitoring and surveys during construction: follow-up nest and avian surveys shall be required if periods of construction inactivity exceed three weeks during January 1 through August 31 in any given area, an interval during which birds may establish a nesting territory and initiate egg	Conduct surveys as needed.	As required	WSP	As required		

BIO-17(b) ***(p. A-120)***	The project owner shall provide a letter report detailing the outcome of the care of any injured birds or nest failures	Submit the letter report to the CPM and the CDFW	Within 14 days of the incident	WSP	As required		
BIO-17(c) ***(p. A-120)***	If active nests are detected during surveys, a no-disturbance buffer zone (protected area surrounding the nest) shall be established around each nest. Fencing and/or flagging will be used to delineate the no-activity zone. To minimize the potential to affect the reproductive success of the nesting pair, the extent of the no-activity zone shall be based several factors, including the distance of the activity to the nest, the type and extent of the proposed activity, the duration and timing of the activity, the sensitivity and habituation of the species, and the dissimilarity of the proposed activity to background activities. The no-activities zone shall be large enough to avoid nest abandonment. Specific buffers shall also be proposed for any shrike caches should they be detected during construction.	If signs of disturbance or distress are observed, the DB(s) or BM(s) shall immediately implement adaptive measures to reduce disturbance, in coordination with the CPM.	DB/BM shall monitor all nests with buffers at least once per week, to determine whether birds are being disturbed.	WSP	As required		
BIO-17(d) ***(p. A-120)***	The DB/BM shall monitor the nest until it is determined that nestlings have fledged and dispersed or the nest is no longer active. Activities that might, in the opinion of the DB/BM,disturb nesting activities (e.g., exposure to exhaust), shall be prohibited within the buffer zone until such a determination is made. Any nest buffer reduction would require full time monitoring if reduced from the levels identified in the approved NBMP.	Any nest buffer reduction would require full time monitoring if reduced from the levels identified in the approved NBMP.	As required	WSP	As required		
BIO-17(e) ***(p. A-120)***	If an active nest is located on project facilities, materials or equipment, the project owner shall avoid disturbance or use of the facilities, materials or equipment (e.g., by red-tag) until the nest is no longer active.	Avoid disturbance as required.	As required	WSP	As required		
BIO-17(f) ***(p. A-120)***	Due to the potential for nest building during active construction, a BM shall be employed for the duration of project construction to regularly inspect for nest building attempts that may occur on/within construction equipment and/or within an area of active construction disturbance.	Perform duties as required.	As required	WSP	As required		

BIO-17(g) *(p. A-120)*	In the event nest building is detected, the biologist shall deter birds from nesting using non-invasive methods to modify the circum-stances. In the event a nest is built, and eggs are laid, the nest shall be considered active nest and shall be avoided.	This may include placing a buffer around a piece of equipment or closing off a work area until the nest has fledged. This measure shall not be employed for state or federal special status species.	As required	WSP	As required		
BIO-17(h) *(p. A-120)*	Throughout the construction phase of the project, nest locations, project activities in the vicinity of nests (including helicopter traces), and any adjustments to buffer areas shall be updated and available to the CPM, weekly or other CPM-approved timeframe. All buffer reduction notifications and prompt notifications of nest-related non-compliance and corrective actions will be made via email to the CPM.	Perform duties as required.	Ongoing during construction	WSP	As required		
BIO-17(i) *(p. A-120)*	At the end of each year's nest season, the project owner shall submit an annual NBMP report to the CPM and CDFW. Specific contents and format of the annual report will be reviewed and approved by the CPM in consultation with CDFW.	The project owner shall provide a letter report detailing the outcome of the care of any injured birds or nest failures to the CPM and the CDFW within 14 days of the incident.	Annually, 30 days after the end of the nesting season	WSP	9/30/27		
BIO-19(a) *(p. A-126)*	The DB shall establish no-disturbance buffer zones around potential, known and nesting burrowing owl burrows **according to the guidelines set forth in the condition (see Items a-con page A-129 of Appendix A** to the Final Decision).	The buffers prescribed above shall not be reduced or otherwise modified without prior written approval from the CPM, in coordination with the CDFW.	As required	WSP	As required		
BIO-19(b) *(p. A-126)*	If the approved DB(s) determines that specific project activities are not likely to affect the burrowing owl using known or nesting burrowing owl burrows due to the nature of the specific project activities, or due to objects or topography that might reduce potential noise disturbance and obstruct view of the project activities from the nest, then the CPM approved DB(s) may email a written request to the CPM to reduce the buffer distance with documented observational data (Buffer Reduction Request).	The CPM will review each Buffer Reduction Request on a case-by-case basis and provide a determination in response to each Buffer Reduction Request in writing. The CPM may request additional and ongoing BMing prior to approving a Buffer Reduction Request.	As required	WSP	As required		

BIO-19(c) ***(p. A-126)***	If the CPM has approved the blockage of a known burrowing owl burrow, the DB shall block rather than destroy any unoccupied known burrowing owl burrow located within the buffer distances limits. Burrows (including burrows in natural substrate and in under man-made structures) may be blocked only immediately after the CPM-approved DB(s) has conducted four consecutive 24-hour periods of monitoring with infrared camera and determined that burrowing owl is not currently present. Burrow blockage shall be done in a manner that prevents burrowing animals from digging back into the burrow.	All blocked burrows shall be monitored by the approved DB(s) and/or BM(s) at least once every 48 hours while the blockage is in place to ensure that the exclusion material is still intact. If burrowing owl regains access to the burrow, the project owner or DB shall contact the CPM immediately and obtain written guidance regarding how to proceed. All blocked burrows shall be unblocked within 48 hours of completion of construction activities within the prescribed buffer distance.	Every 48 hours as required	WSP	As required		
BIO-19(d) ***(p. A-126)***	The approved DB(s), and/or BM under direct supervision of the approved DB(s), shall excavate known or potential burrows that exhibit signs of current or past burrowing owl use or characteristics suggestive of a burrowing owl burrow (including burrows in natural substrate and in/under man-made structures) that cannot be avoided per guidance in Item 5 (Burrowing Owl Burrow Avoidance), that are within the project site. Burrows to be destroyed shall be fully excavated, filled with dirt, and compacted to ensure that burrowing owl cannot reenter or use the burrow during the period that project activities occur in the project site.	Perform duties as required.	As required	WSP	As required		
BIO-19(e) ***(p. A-126)***	Excavation of known burrowing owl burrows shall only occur after the approved DB(s) has determined that burrowing owl is not currently present after 4 consecutive 24-hour periods of monitoring with infrared cameras. If the excavation process reveals evidence of current use by burrowing owl, then burrow excavation shall cease immediately, and camera monitoring as described above shall be conducted or resumed as applicable. burrowing owl burrows shall be carefully excavated with hand tools, or by mechanical means if a specific methodology is approved in writing by the CPM, until it is clear no individuals of burrowing owl are inside.	Perform duties as required.	As required	WSP	As required		

BIO-19(f) *(p. A-126)*	Potential burrowing owl burrows without any signs of burrowing owl use or characteristics suggesting it is a burrowing owl burrow may be excavated under the direct supervision of the approved DB(s) without prior camera monitoring.	Perform duties as required.	As required	WSP	As required		
BIO-19(g) *(p. A-126)*	If a burrowing owl is injured or found dead within the vicinity of the project area, project owner shall notify the CPM of the injury or mortality to the burrowing owl immediately by email. The DB(s) shall follow the Burrowing Owl Mortality Reduction Plan to either immediately transport injured individuals to a CPM-approved wildlife rehabilitation center or veterinary facility or follow approved collection and storage	Perform duties as required.	As required	WSP	As required		
BIO-19(h) *(p. A-126)*	All workers shall be trained to identify burrowing owl and shall inform the approved DB(s) if a burrowing owl is seen within or near the project area during implementation of any project activity. All work in the vicinity of the burrowing owl which could harm the individual, shall cease until the individual moves from the project area of its own accord or the approved DB(s) passively encourages the individual to move out of harm's way, in compliance with the timing and methods identified in the CPM-approved Burrowing Owl Mortality Reduction Plan.	Perform duties as required.	As required	WSP	As required		
BIO-19(i)	The project owner shall submit a final Burrowing Owl Mitigation Implementation Report detailing location of all burrowing owl observed, measures implemented, and their effectiveness.	Submit a final Burrowing Owl Mitigation Implementation Report.	Within 30 days of the conclusion of the construction period	WSP	1/31/30		
BIO-19(j)	During site mobilizatio and constructionctivities or while implementing burrowing owl take minimization measures, the project owner shall not allow vehicles to park on top of known or potential burrowing owl burrows. Vehicles left overnight shall not be located within 50 feet of known burrowing owl burrows. Workers shall inspect for burrowing owl under vehicles and equipment every time the vehicles and equipment are moved. If a burrowing owl is present, the worker shall wait for the burrowing owl to move unimpeded to a safe location.	Alternatively, the approved Designated Biologist(s) shall be contacted to passively encourage the burrowing owl to move away from the vehicle or equipment, in compliance with the timing and methods identified in the Burrowing Owl Mortality Reduction Plan.	Ongoing during construction	WSP	Ongoing during construction		

BIO-20(a) ***(p. A-134)***	The DB shall prepare a Swainson's Hawk Survey Report and submit the document to the CPM for review and approval and the CDFW for review and comment. Throughout the construction phase of the project, nest locations, project activities in the vicinity of nests, and any adjustments to buffer areas shall be updated and available to the CPM.	Nest data and, if applicable, nest activity monitoring results and any adaptive management actions taken, shall be provided to CPM and CDFW in monitoring reports submitted as part of the Monthly Compliance Report, as data becomes available and if specific nest monitoring or any adaptive management actions are taken, and summarized in annual monitoring reports.	Via email to the CPM/CDFW and Monthly in the MCR prepared by Hydrostor	WSP	by 10th of each month		
BIO-20(a) ***(p. A-134)***	At the end of each year's nest season, the project owner shall submit an annual monitoring report to the CPM and CDFW.	Specific contents and format of the annual report shall be submitted to the CPM for review and approval, in consultation with CDFW.	Annually at the end of each year's nest season	WSP	12/31/26		
BIO-21(a) ***(p. A-126)***	DB shall conduct a small mammal clearance survey of the project site and laydown areas to identify new or modified dense burrow concentrations they may not have been identified during pre-construction surveys.	Provide the small mammal survey reports to the CPM and CDFW	Prior to any site mobilization in any new areas	WSP	As required		
BIO-21(b) ***(p. A-126)***	During initial grading the DB(s) and/or BM(s) shall make every effort to salvage small mammals such as pocket mice that may be displaced during initial ground disturbance. Mice will be collected, stored in a container that provides refuge, then relocated to adjacent habitat and placed under a shrub.	Perform duties as required.	During initial grading	WSP	During initial grading		
BIO-21(c) ***(p. A-126)***	If mortality or serious injury (i.e., compromising survival in the wild) occurs to any special status small mammal (e.g., Tulare pocket mouse, Tehachapi pocket mouse, San Joaquin pocket mouse, etc.), the DB shall immediately contact the CPM to evaluate if additional measures are required, in coordination with CDFW.	Perform duties as required.	As required	WSP	As required		
BIO-21(d) ***(p. A-126)***	Provide a monitoring report that includes the location, description, and duration of the activities, any observations or detections of these species found during the surveys or project activities, any salvage efforts that were implemented, and any mortalities or injuries that were reported.	Provide the report to the CPM	Monthly in the MCR prepared by Hydrostor	WSP	by 10th of each month		

BIO-22(a) ***(p. A-138)***	If a desert kit fox or ringtail den is determined to be active, it shall be avoided by a minimum of 500 feet during the pupping season (January 1 through August 31 for desert kit fox; May 1 through August 31 for ringtail) and by a minimum of 200 feet outside of the pupping season (September 1 through December 31 for desert kit fox; September 1 through April 30 for ringtail). If an American badger den is determined to by active, it shall be avoided by a minimum of 250 feet during the pupping season (March 1 through August 31) and by a minimum of 100 feet during the non-pupping season (September 1 through February 28). Avoidance buffers shall be established by the DB using staking, flagging, or other conspicuous materials. No project activities will be permitted within the avoidance buffers.	The DB may modify the avoidance buffer distances based on the location of the den, specific site conditions, and nature of proposed work activities, with prior written approval from the CPM in coordination with CDFW. The avoidance buffer shall remain in place until the DB(s) confirms that the young have left the den or the den has been naturally abandoned or failed.	During construction phase	WSP	As required		
BIO-22(b) ***(p. A-138)***	The DB and/or BM(s) shall remain onsite throughout the duration of any project activities that are conducted within 300 feet of the edge of the avoidance buffer. The biologist will have the authority to halt work, if it is determined that the animals are exhibiting increased levels of distress (e.g., displaying defensive behavior, pacing, leaving the den).	Perform duties as required.	During construction phase	WSP	As required		
BIO-22(c) ***(p. A-140)***	The project owner or DB shall notify the CPM as well as CDFW within 24-hours if an American badger or desert kit fox, or any other special status mammal is detected during the surveys or during routine monitoring. The report shall include the number of animals detected, photos, and the location of the detection. Upon receiving notification, the CPM and CDFW may provide guidance for further action as appropriate tothe species.	Notify the CPM and CDFW, including number of animals detected, photos, and location of detection.	Within 24 hours of detection	WSP	As required		
BIO-22(d) ***(p. A-138)***	If any special status mammal species are found dead or injured during any project-related activities, the project owner or DB shall immediately notify the CPM and CDFW and shall provide written notification to CPM and CDFW within 48 hours. The CPM and CDFW shall review the activities resulting in mortality and determine if additional protective measures are required.	Perform duties as required.	Conduct notifications as required	WSP	As required		

BIO-22(e) ***(p. A-138)***	A report documenting survey results, including surveyor name(s), date(s) of survey, location (with maps), weather conditions, and any observations or detections of sensitive mammals or their dens will be prepared and submitted to the CPM and CDFW. In addition, a monitoring report that includes the location, description, and duration of the activities, any observations or detections of these species found during the surveys or project activities will be provided.	Prepare and submit the required reports to the CPM and CDFW.	during monthly, quarterly, and annual compliance reporting	WSP	Annual Report 1/31 each year; Monthly/Quarterly in DB mothly report		
BIO-23(a) ***(p. A-141)***	If surveys for Mojave Ground Squirrel are negative, the site will be considered not occupied and construction may proceed upon approval by the CPM. No additional surveys would be required for the duration of construction unless a period of one year or more passes prior to any ground-disturbing activities. Additional follow-up surveys shall be required if periods of construction inactivity exceeds more than one year in any given area.	Perform duties as required.	As required	WSP	As required		
BIO-23(b) ***(p. A-141)***	If Mohave ground squirrels are detected a 300-foot non-disturbance buffer shall be established around the detection site where no construction activities may occur. This non-disturbance buffer shall remain in place until the CPM and CDFW have been consulted and have provided direction on appropriate next steps.	The project owner or DB shall notify the CPM and CDFW within 24 hours of any Mohave ground squirrel detected during the surveys. The report shall include the number of animals detected, photographs (if available), and the location of the detection. Upon receiving notification, the CPM and CDFW will provide guidance for further action as appropriate to the species.	Conduct notifications as required	WSP	As required		
BIO-23(c) ***(p. A-141)***	A report documenting survey results, including surveyor name(s), date(s) of survey, location (with maps), weather conditions, and any observations or detections of Mohave ground squirrels shall be prepared and submitted to the CPM and CDFW. In addition, a monitoring report that includes the location, description, and duration of the activities, any observations or detections of the species found during the surveys or project activities shall be provided during monthly and annual compliance reporting.	Prepare and submit the required reports to the CPM and CDFW.	Monthly in the MCR prepared by Hydrosto Annually in the ACR prepared by Hydrostor	WSP	by the 10th of each month and annually		

BIO-24 (a) ***(p. A-143)***	Lake and Streambed Equivalency Conditions. The project owner shall **implement measures 1-10 in the condition** to avoid, minimize and mitigate for potential direct and indirect impacts to jurisdictional waters of the state and to satisfy the requirements of California Fish and Game Code, sections 1600 through 1607. This includes providing copies of requirements to all contractors and subcontractors and maintaining copies at each work site, to be presented to any CPM or CDFW upon demand.	The project owner shall provide the updated Jurisdictional Report that clearly delineates all proposed permanent and temporary impacts, the proposed engineering drawings for each crossing type, and the hydrologic studies used to inform the engineering design to the CPM for review and approval no less than 45 days prior to site mobilization.	Final Reports: no later than 14 days prior to the installation of any engineered crossing, bridge, or new culvert.	WSP	9/1/26		8/17/26: CEC table shows CONDITIONAL APPROVAL RECEIVED FOR LNTP2. For full NTP, CEC needs LSA equivalency, maps of proposed disturbance area (all permanent and temp impacts wthin streams), engr drawings for each crossing typesand final reports and plans. 9/8/26: Email from CPM sreceived stating that the jurisdictional waters report is approved but the following information is required: **Final Engineering Plans** (top-down and profile drawings) of any work taking place in Drainage 73 or for culverts conveying water from Drainage 73. Drainage 73 is the stream at the southwest corner of the project site running across Dawn Road. (required no later than 14 days before start of culvert installation). **Maps of all temporary and permanent disturbance that would occur within Drainage 73**. This is not visible in the maps provided and are required at no less than 30 days before start of work in Drainage 73). **Area (square feet) and length (linear feet parallel to stream course) of temporary and permanent disturbance that would occur within Drainage 73, if final engineering plans change impact area from the "approximately 0.01 acres or 120 LF" stated in Section 8 of the Report. (**Please note that these are required at no less than 30 days before start of work in Drainage 73).
BIO-24(b)	At the conclusion of construction, the project owner shall provide a true-up of any jurisdictional features that were subject to temporary or permanent impacts the CPM no more than 30 days following the cessation of construction along the generation tie- line in the Construction Termination Report.	Provide as required	No more than 30 days following the cessation of construction	WSP	1/31/30		
CIV-1(a) ***(p. A-9)***	The project owner shall submit to the DCBO for review and approval the following: 1. Design of the proposed drainage structures and the grading plan; 2. An erosion and sedimentation control plan; 3. Related calculations and specifications, signed and stamped by the responsible civil engineer; and 4. Soils, geotechnical, or foundation investigations reports required by the 2022 Building Code.	The project owner shall submit the documents described above to the DCBO for design review and approval.	At least 45 days prior to the start of Oct 1, 2026 rainy season for Early Works and 15 days prior to start of site grading for Later Works area	Hatch			8/19/26: Need final DCBO approval of the DESCP and SWMP prior to issuance of a Full NTP

CIV-1(b) *(p. A-9)*	Following the DCBO's approval, the project owner shall submit a written statement certifying that the documents have been approved by the DCBO.	In the next MCR following the DCBO's approval, the project owner shall submit a written statement certifying that the documents have been approved by the DCBO.	Monthly in the MCR prepared by Hydrostor	Hatch and Granite	by 10th of each month		
CIV-2(a) *(p. A-9)*	The resident engineer shall, if appropriate, stop all earthwork and construction in the affected areas when the responsible soils engineer, geotechnical engineer, or the civil engineer experienced and knowledgeable in the practice of soils engineering, identifies unforeseen adverse soil or geologic conditions.	The project owner shall notify the CPM within 24 hours when earthwork and construction is stopped as a result of unforeseen adverse geologic/soil conditions.	As required	Hydrostor with input from Hatch & Granite	As required		
CIV-2(b) *(p. A-9)*	The project owner shall submit modified plans, specifications, and calculations to the DCBO based on these new conditions. The project owner shall obtain approval from the DCBO before resuming earthwork and construction in the affected area.	The project owner shall provide the CPM with a copy of the DCBO's approval.	Within 24 hours of the DCBO's approval to resume earthwork and construction in the affected areas	Hydrostor with input from Hatch & Granite	Ongoing during construction		
CIV-3(a) *(page A-9)*	All site-grading operations, for which a grading permit is required, shall be subject to inspection by the DCBO. If in the course of inspection it is discovered that the work is not being performed in accordance with the approved plans, the discrepancies shall be reported immediately to the resident engineer, the DCBO, and the CPM.	Report immediately to the resident engineer, DCBO, and CPM	Immediately	Granite	Ongoing during construction		
CIV-3(b) *(page A-9)*	The project owner shall prepare a written report, with copies to the DCBO and the CPM, detailing all discrepancies, non-compliance items, and the proposed corrective action.	The resident engineer shall transmit to the DCBO and the CPM a non-conformance report (NCR), and the proposed corrective action for review and approval.	Within 5 days of the discovery of any discrepancies	Hydrostor with input from Hatch & Granite	Ongoing during construction		
CIV-3(c) *(page A-9)*	The project owner shall submit the details of the corrective action to the DCBO and the CPM.	Submit the details of the corrective action to the DCBO and CPM.	Within 5 days of resolution of the NCR	Hydrostor with input from Hatch & Granite	Ongoing during construction		

CIV-4(c) *(page A-9)*	Provide a list of NCRs for the reporting month shall in the MCR.		Monthly in the MCR prepared by Hydrostor	Hydrostor with input from Hatch & Granite and WSP	by 10th of each month		
CIV-4(a) *(page A-10)*	After completion of finished grading and erosion and sedimentation control and drainage work, the project owner shall obtain the DCBO's approval of the final grading plans (including final changes) for the erosion and sedimentation control work. The civil engineer shall state that the work within their area of responsibility was done in accordance with the final approved plans.	Submit to the DCBO, for review and approval, the final grading plans (including final changes) and the responsible civil engineer's signed statement that the installation of the facilities and all erosion control measures were completed in accordance with the final approved combined grading plans, and that the facilities are adequate for their intended purposes.	Within 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) of the completion of the erosion and sediment control mitigation and drainage work	Hatch to submit final grading plans to DCBO	TBD		
CIV-4(b) *(page A-10)*	Submit a copy of the DCBO's approval	Submit to the CPM	Include in next MCR prepared by Hydrostor	Hatch	by 10th of each month		
COM-1 *(p. A-206)*	Unrestricted Access: The project owner shall take all steps necessary to ensure that the CPM, responsible CEC staff, and delegate agencies or consultants have unrestricted access to the facility site, related facilities, project-related staff, and the records maintained on site for the purpose of conducting audits, surveys, inspections, or general or closure-related site visits.	Although the CPM will normally schedule site visits on dates and times agreeable to the project owner, the CPM reserves the right to make unannounced visits at any time, whether such visits are by the CPM in person or through representatives from CEC staff, delegated agencies, or consultants.	Ongoing during construction	Hydrostor and Granite	Ongoing during construction		

COM-2 *(p. A-206)*	Compliance Record: The project owner shall maintain electronic copies of all project files and submittals related to the CEC license on site, or at an alternative site approved by the CPM.	The files shall also contain at least one hard copy of Supplemental AFC; all amendment petitions and CEC orders; all site-related environmental impact and survey documentation; all appraisals, assessments and studies for the project; all finalized original and amended structural plans and "as-built" drawings for the entire project; all citations, warnings, violations, or corrective actions; most current versions of any plans, manuals, and training documentation required by the CofCs or applicable LORS.	Life of Project	Hydrostor	Ongoing		
COM-3 *(p. A-206)*	Compliance Verification Submittals: All reports and plans required by the project's Conditions of Certification shall be submitted in a searchable electronic format (.pdf, MS Word or Excel, etc.) and include standard formatting elements such as a table of contents identifying by title and page number each section, table, graphic, exhibit, or addendum.	All report and/or plan graphics and maps shall be adequately scaled and shall include a key with descriptive labels, directional headings, a bar scale, and the most recent revision date.	Ongoing during construction	Hydrostor	Ongoing during construction		
COM-5 *(p. A-208)*	Compliance Matrix: The project owner shall submit a compliance matrix to the CPM with each MCR.	The Construction Matrix shall identify provide information related to **Items 1-8 as set forth in the Condition**.	Monthly in the MCR	Hydrostor with input from Hatch	by 10th of each month		
COM-6 *(p. A-208)*	MCRs shall be submitted each month until construction is complete, and the final certificate of occupancy is issued by the DCBO.	MCRs shall be clearly identified for the month being reported. The MCR shall contain, at a minimum, information related to **Items 1-10 in the Condition.**	Monthly in the MCR	Hydrostor with input from Hatch, Granite and WSP	by 10th of each month		
COM-7(a) *(p. 210)*	Kern County Planning and Natural Resources Department (KCPNRD) shall be provided contact information including cell phone, office numbers and e-mails for the project owner's Representatives(s) and the CPM.	Provide contact information to KCPNRD		Hydrostor	As required		

COM-7(a) *(p. 210)*	Notify KCPNRD of commencement of any road construction	Provide wirtten notification to KCPNRD	At time of milestone	Hydrostor w/ input from Granite	8/20/26	8/20/26	8/20/26: ROC sent to KC
COM-7(a) *(p. 210)*	Notify KCPNRD of moving of equipment for grading onto the site	Provide wirtten notification to KCPNRD	At time of milestone	Hydrostor w/ input from Granite	8/20/26	8/20/26	8/20/26: ROC sent to KC
COM-7(a) *(p. 210)*	Notify KCPNRD of the beginning of any blasting or excavation	Provide wirtten notification to KCPNRD	At time of milestone	Hydrostor w/ input from Granite	9/30/26		
COM-7(a) *(p. 210)*	Notify KCPNRD of filling of the retention pond	Provide wirtten notification to KCPNRD	At time of milestone	Hydrostor w/ input from Granite	6/30/29		
COM-7(a) *(p. 210)*	Notify KCPNRD of completion of excavation	Provide wirtten notification to KCPNRD	At time of milestone	Hydrostor w/ input from Granite	TBD		
COM-7(a) *(p. 210)*	Notify KCPNRD of completion of facilities	Provide wirtten notification to KCPNRD	At time of milestone	Hydrostor	TBD		
COM-8 *(p. A-210)*	Periodic and Annual Compliance Report (ACRs). After construction is complete, the project must submit searchable electronic ACRs to the CPM, as well as other periodic compliance reports (PCRs) required by the various technical disciplines.	Submit the required reports to the CPM, **as listed in items 1-10 in the Condition.**	After construction is complete	Hydrostor with input from Hatch, Granite and WSP	TBD		

COM-9 *(p. A-211)*	Confidential Information: Any information that the project owner designates as confidential shall be submitted to the CEC's Executive Director with an application for confidentiality, pursuant to Title 20, California Code of Regulations, section 2505(a).	Any information deemed confidential pursuant to the regulations will remain undisclosed, as provided in Title 20, California Code of Regulations, sections 2501 et seq.	As required	Hydrostor with input from Hatch, Granite and WSP	As required		
COM-10 *(p. A-211)*	Annual Energy Facility Compliance Fee: the project owner is required to pay an annually adjusted compliance fee.	Current compliance fee information is available on the CEC's website at http://www.energy.ca.gov/siting/filing_fees.html.	By July 1 of each year in which the facility retains is certification	Hydrostor	7/1/27		
COM-11 *(p. A-212)*	Amendments, Staff-Approved Project Modifications, Ownership/Operational Control Changes, Staff and Project Owner Jointly Initiated Amendments and Verification Changes: The project owner shall petition the CEC, pursuant to Title 20, California Code of Regulations, section 1769, to modify the design, operation, or performance requirements of the project or linear facilities, or to transfer ownership or operational control of the facility. Staff and Project Owner Jointly Initiated Amendments, and Verification Changes, are exempt from section 25806(e) and, therefore, do not require a filing fee.	The CPM will determine whether staff approval will be sufficient, or whether Commission approval will be necessary. It is the project owner's responsibility to contact the CPM to determine if a proposed project change triggers the requirements of section 1769. Section 1769 details the required contents for a petition to amend (PTA) a CEC Decision.	As required	Hydrostor	As required		
COM-12 *(p. A-212)*	Reporting of Complaints, Notices, and Citations: The project owner shall post the telephone number onsite and make it easily visible to passersby during construction, operation, and closure. The project owner shall post the telephone number onsite and make it easily visible to passersby during construction.	The project owner shall respond to all recorded complaints within 24 hours or the next business day and provide , the project owner shall report, and provide copies to the CPM, all complaints, including, but not limited to, noise and lighting complaints, notices of violation, notices of fines, official warnings, and citations. Complaints shall be logged and numbered.	Respond to recorded complaints within 24 hours Provide CPM information within 5 business days of receipt	Hydrostor with input from Granite	As required		
COM-13 *(p. A-213)*	Emergency Response Site Contingency Plan: Update and resubmit the Contingency Plan prior to the start of commercial operation. The Contingency Plan shall evidence a facility's coordinated emergency response and recovery preparedness for a series of reasonably foreseeable emergency events. The CPM may require Contingency Plan updating over the life of the facility.	Submit the updated Contingency Plan for CPM review and approval.	no less than 60 days prior to the start of commercial operation	Hydrostor with input from Granite and Hatch	11/2/29		

COM-14(a) *(p. A-214)*	Incident-Reporting Requirements: The project owner shall notify the CPM within one hour after it is safe and feasible, of any incident at the facility that results in any of the following: 1) An event of any kind that causes a "Forced Outage" as defined in the California ISO tariff; 2) The activation of onsite emergency fire suppression equipment to combat a fire; 3) Any chemical, gas or hazardous materials release that could result in potential health impacts to the surrounding population; or create an offsite odor issue; and 4) Notification to, or response by, any off-site emergency response federal, state or local agency regarding a fire, hazardous materials release, onsite injury, or any physical or cyber security incident.	Notification shall describe the circumstances, status, and expected duration of the incident. If warranted, as soon as it is safe and feasible, the project owner shall implement the safe shutdown of any non-critical equipment and removal of any hazardous materials and waste that pose a threat to public health and safety and to environmental quality (also, see specific Conditions of Certification for the technical areas of Hazards, Hazardous Materials Management, Hazardous Waste, and Wildfire, and Solid Waste Management).	Notify the CPM within one hour after it is safe and feasible	Hydrostor with input from Granite, Hatch and WSP	As necessary		
COM-14(b) *(p. A-214)*	The project owner shall submit to the CPM a detailed incident report that includes, as applicable, with the information **set forth in Items 1-12 in the Condition.**	Submit the detailed incident report to the CPM	Within six business days of the incident	Hydrostor with input from Granite, Hatch and WSP	As necessary		
COM-14(c) *(p. A-214)*	After the submittal of the initial report for any incident, the project owner shall submit to the CPM copies of incident reports. The project owner shall maintain all incident report records for the life of the project, including closure.	If the project owner requests that an incident notification or report be designated as a confidential record and not publicly disclosed, the project owner shall submit copies of notices or reports with an application for confidential designation in accordance with CEC regulations.	within 48 hours of a request	Hydrostor with input from Granite, Hatch and WSP	As necessary		
COM-14(d) *(p. A-214)*	If the project owner requests that an incident notification or report be designated as a confidential record and not publicly disclosed, the specified process will be followed.	The project owner shall submit copies of notices or reports with an application for confidential designation in accordance with CEC regulations.	As required	Hydrostor	As required		

CUL/TRI-1(a) *(p. 160)*	Appointment and Qualifications of Cultural Resources Personnel: The project owner may replace a CRS by submitting the required resume, references and contact information to the CPM. In an emergency, the project owner shall immediately notify the CPM to discuss the qualifications and approval of a short-term replacement while a permanent CRS is proposed to the CPM for consideration.	Submit the information to the CPM	At least 10 working days prior to the termination or release of the preceding CRS	WSP	As required		
CUL/TRI-1(b) *(p. 160)*	Additional CRMs or Native American Monitors: the CRS shall review the qualifications of the proposed CRMs or Native American Monitors and send approval letters to the CPM, identifying the monitors and attesting to their qualifications.	CRS to send approval letters to the CPM	At least 5 days prior	WSP	As required		
Page A-163)	Information to be provided to the CRS: If construction of the project would proceed in phases, maps and drawings not previously provided shall be provided to the CRS and CPM prior to the start of each phase.	Written notice identifying the proposed schedule of each project phase shall be provided to the CRS and CPM.	At least 15 days prior to each phase of construction	WSP	As required		
CUL/TRI-2(b) *(Page A-163)*	During ground disturbance, the project owner shall provide a schedule of the next week's anticipated project activity	Provide to the CRS and CPM by letter, e-mail, or fax.	Weekly during construction	WSP	Weekly during ground disturbance		
CUL/TRI-2(c) *(Page A-163)*	If the scheduling of phases of a phased project changes, provide written notice of the changes.	Notify the CRS and CPM of the changes.	Within 5 days of changing the scheduling	WSP	As required		
CUL/TRI-3(a)	Prepare a CTRMMP under the direction of the CRS in coordination with the consulting tribes choosing to participate in the development of the plan.	Submit the CTRMMP to the CPM for review and approval.	At least 30 days prior to the start of ground disturbance	WSP	9/5/26		CONDITIONAL APPROVAL RECEIVED FOR LNTP2. 8/15/26: WSP submitted Rev1 to CPM; must be approvedf in order to receive Full NTP 9/3/26: CEC comments received.

CUL/TRI-3 ***(Page A-165)***	The CTRMMP shall identify measures to minimize potential impacts on cultural and tribal cultural resources. Implementation of the CTRMMP shall be the responsibility of the CRS and the project owner. The project owner shall provide to the CPM a copy of an agreement with, or other written commitment from, a curation facility that meets the standards stated in the SHRC's Guidelines for the Curation of Archaeological Collections (1993, or future updated guidelines from SHRC), to accept the archaeological materials from this project.	This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the project owner to pay for those fees. Any agreement concerning curation will be retained and available for audit for the life of the project.	Within 90 days after completion of ground disturbance (including landscaping), if archaeological materials requiring curation were generated or collected	WSP	4/1/30		
CUL/TRI-4(a) ***(p. 169)***	Cultural Resources WEAP: Prior to and for the duration of ground disturbance, the WEAP shall be administered to all onsite personnel who will enter the project site including but not limited to surveyors, construction engineers, employees, contractors, contractor's employees, supervisors, inspectors, subcontractors (but excluding delivery personnel), biologists, cultural, tribal, and paleontological monitors. A WEAP Light can be provided to vendors, such as delivery personnel (e.g., building materials, concrete, heavy equipment, etc.), who periodically enter the project site and are limited to areas such as existing access roads and/or lay down areas.	The CRS and/or Alternative CRS shall collaborate with the consulting tribes in preparing and presenting the training. The training may be discontinued when ground disturbance is completed or suspended, but must be resumed when ground disturbance, such as landscaping, resumes. At least 10 days prior to each WEAP training, the CRS shall inform the cultural resources representatives for the consulting tribes of the upcoming training and invite them to attend and/or participate should they elect to.	At least 10 days prior to each WEAP training offered	WSP	Ongoing during ground disturbance		
CUL/TRI-4(b) ***(p. 169)***	The project owner shall provide the WEAP Training Acknowledgement forms of workers who have completed the training in the prior month and a running total of all persons who have completed training to date.	Include information in the MCR	Monthly in the MCR until ground disturbance is completed	WSP	by 10th of each month		

CUL-5(a) ***(p. A-171)***	Undiscovered Cultural Resources: The project owner shall ensure that a CRS, alternate CRS, or CRM and Native American Monitor shall be present for any ground disturbance associated with construction of the project, including but not limited to tree/shrub removal and planting, clearing/ grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, and hardscape installation.	Where excavation equipment is actively removing dirt and hauling the excavated material farther than 50 feet from the location of active excavation, full-time archaeological monitoring shall require at least two monitors per excavation area. In this circumstance, one monitor shall observe the location of active excavation, and a second monitor shall inspect the dumped material. For excavation areas where the excavated material is dumped no farther than 50 feet from the location of active excavation, one monitor shall observe both the location of active excavation and inspect the dumped material.	Ongoing during construction	WSP	Ongoing during ground disturbance		
CUL-5(b) ***(p. A-171)***	While monitoring is ongoing, daily monitoring logs will be prepared by the CRS/CRM. If more than 10 artifacts are found daily, maps will be provided along with the logs.	Copies of the daily monitoring logs and cover sheets shall be provided by email from the CRS to the CPM, **as set forth in the condition**. The CRS and/or project owner shall notify the CPM of any incidents of non-compliance with the conditions and/or applicable LORS by telephone or email within 24 hours.	Daily within 24 hours	WSP	Daily during ground disturbance		
CUL-5(c) ***(p. A-171)***	The CRS shall provide weekly maps of artifacts if there more than 50 artifacts are found per week, or as requested by the CPM. The map shall be submitted within two business days after the end of each week.	Copies of the weekly monitoring logs and cover sheets shall be provided by email from the CRS to the CPM, **as set forth in the condition**.	As set forth in the condition	WSP	Tuesday of the following week, as required		
CUL-5(d) ***(p. A-171)***	While monitoring is ongoing, the CRS shall compile a monthly monitoring summary report to be included in the MCR. Each MCR, prepared under supervision of the CRS, shall be accompanied by a confidential appendix **that contains the information set forth in the condition**. If there are no monitoring activities, the summary report shall specify why monitoring did not occur.	The monthly monitoring summary will include the information set forth in the condition. Each MCR shall be accompanied by a confidential appendix that contains the information set forth in the Condition.	Monthly in the MCR prepared by Hydrostor	WSP	by 10th of each month		

CUL-5(e) ***(p. A-171)***	Final updated DPR 523 forms with sites (where artifacts are collected month after month) can be submitted at the completion of monitoring, as agreed upon with the CPM.	Submit the forms to the CPM	At the end of monitoring	WSP	At conclusion of ground disturbance		
CUL-5(f) ***(p. A-171)***	The project owner shall prepare a letter or e-mail (or some other form of communication acceptable to the CPM) detailing the CRS's justification for changing the monitoring level.	Submit to the CPM, for review and approval,	At least 24 hours prior to changing monitoring level	WSP	As required		
CUL-5(g) ***(p. A-171)***	The project owner shall submit copies of any comments or information provided by California Native American tribes in response to the project owner's transmittals of information.	Provide copies of comments or information to CPM	Within 15 days of receiving them	WSP	As required		
CUL-5(h) (p. A-175)	Upon becoming aware of any incidents of non-compliance with the conditions and/or applicable LORS, the CRS and/or the project owner shall notify the CPM. The CRS shall also recommend corrective action to resolve the problem or achieve compliance with the Conditions of Certification.	When the issue is resolved, the CRS shall write a report describing the issue, the resolution of the issue, and the effectiveness of the resolution measures. This report shall be provided in the next MCR for the review of the CPM.	In the next MCR prepared by Hydrostor	WSP	by 10th of each month		
CUL/TRI-6(a) ***(p. A-176)***	Authority to Halt Construction in the Event of a Discovery: The CRS shall have the authority to halt ground disturbance in the event of a discovery. Redirection of ground disturbance shall be accomplished under the direction of the construction supervisor in consultation with the CRS.	The project owners shall ensure that the CRS notifies the CPM.	within 24 hours of a discovery, or by Monday morning if the discovery occurs between 8:00 a.m. on Friday and 8:00 a.m on Sunday morning	WSP	within 24 hours as required		
CUL/TRI-6 (b) ***(p. A-176)***	Unless the discovery can be treated prescriptively, as specified in the CTRMMP, completed DPR 523 forms for resources newly discovered during ground disturbance shall be submitted.	Submit the forms to CPM for review and approval	no later than 24 hours following the notification of the CPM, or 48 hours following the completion of data recordation/recovery ,	WSP	As required		

CUL/TRI-6 (c) *(p. A-176)*	Upon discovery of a resource of interest to Native Americans, the project owner shall ensure that the CRS notifies all California Native American tribes that expressed a desire to be notified in the event of such a discovery within 48 hours of a discovery.	The CRS must inform the CPM when the notifications are complete. Additionally, the project owner shall submit to the CPM copies of letters of transmittal for all subsequent responses to Native American requests for notification, consultation, and reports and records.	As necessary	WSP	As required		
CUL/TRI-6 (d) *(p. A-176)*	The project owner shall submit to the CPM copies of any comments or information provided by California Native American tribes in response to the project owner's transmittals of information.	Submit to the CPM	Within 15 days of receiving them	WSP	As required		
CUL-TRI-7(a) *(p. A-178)*	FINAL CULTURAL AND TRIBAL CULTURAL RESOURCES REPORT: Prepare the CTRR along with letters or statements of support of the CTRR from the consulting tribes.	Submit the Final CTRR to the CPM for approval.	Within 90 days after completion of ground disturbance (including landscaping)	WSP	4/1/30		
CUL/TRI-7(b) *(p. A-178)*	The project owner shall provide documentation to the CPM confirming that copies of the final CTRR have been provided to the CHRIS, the curating institution, if archaeological materials were collected, and to the tribal chairpersons and cultural resources representatives of the Yuhaaviatam of San Manuel Nation, Tejon Indian Tribe, Kern Valley Indian Community, and any California Native American tribes that request copies of project-related reports.		Within 10 days after CPM approval of the CTRR	WSP	5/1/30		
CUL/TRI-7(c) *(p. A-178)*	If the project owner requests a suspension of all construction activities for more than 30 days, then a draft CTRR shall be prepared by the CRS in coordination with the cultural resources representatives of the consulting tribes and submitted to the CPM along with letters or statements of support of the draft CTRR from the consulting tribes for review and approval on the same day as the suspension/extension request.	Submit the Draft CTRR to the CPM. The draft CTRR shall be retained at the project site in a secure facility until construction resumes or the project is withdrawn.	Within 30 days after requesting a suspension of construction activities	WSP	As required		
CUL/TRI-7(d) *(p. A-178)*	If the project is withdrawn, the final CTRR shall be submitted to the CPM for review and approval at the same time as the withdrawal request.	Submit the Final CTRR to the CPM for approval.	As required	WSP	As required		

CUL/TRI-8 ***(p. A-179)***	If project plans change to include any of the areas that were unable to be surveyed or sites that were not formally evaluated, additional surveys will be conducted and any new resources will be recorded as well as any previously recorded resources revisited, and site records updated.	The project owner will confer with the consulting tribes regarding newly identified California Native American cultural resources' archaeological significance, its potential as a tribal cultural resource, and avoidance (or other appropriate treatment).	Notify the CPM within 30 days of any additional survey, evaluations, or data recovery conducted.	WSP	As required		
ELEC-1(a) ***(p. A-14)***	Project owner shall submit, for DCBO design review and approval, the proposed final design, specifications, and calculations **for the items listed in the Condition.**	The project owner shall submit the required documents to the DCBO for design review and approval.	At least 30 days prior to the start of any increment of electrical construction for all electrical equipment and systems 110 Volts (V) or higher	Hatch	TBD		
ELEC-1(b) ***(p. A-14)***	The project owner shall request that the DCBO inspect the installation to ensure compliance with the requirements of applicable LORS.	The project owner shall provide a copy of the signed and stamped statement from the responsible electrical engineer attesting compliance with the applicable LORS	Monthly in the MCR prepared by Hydrostor	Hatch	by 10th of each month		
ELEC-1(c) ***(p. A-14)***	The project owner shall provide a copy of the signed and stamped statement from the responsible electrical engineer attesting compliance with the applicable LORS	Send the CPM a copy of the transmittal letter in the next MCR.	Monthly in the MCR prepared by Hydrostor	Hatch and Granite to provide input	by 10th of each month		
ELEC-1(d) ***(p. A-14)***	The following activities shall be reported to the CPM in the MCR: 1. Receipt or delay of major electrical equipment; 2. Testing or energizing of major electrical equipment; and 3. a signed statement by the registered electrical engineer certifying that the proposed final design plans and specifications conform to requirements set forth in the CEC decision.	Include the required information in the MCR.	Monthly in the MCR prepared by Hydrostor	Hatch and Granite to provide input	by 10th of each month		

GEN-1 *(p. A-1)*	The project owner shall design, construct, and inspect the project in accordance with the 2022 California Building Standards Code (Building Standards Code) **as described in detail in the Condition.**	Project owner shall submit to the CPM a statement of verification, signed and stamped by the responsible engineer(s), attesting that all designs, construction, installation, and inspection requirements of the applicable LORS and the Final Decision have been met in the area of Facility Design.	Within 30 days following receipt of the certification of occupancy from the DCBO	Hydrostor to submit verification signed and stamped by Hatch's RE	TBD		
GEN-2 *(p. A-2)*	The project owner shall furnish the CPM and the DCBO with a schedule of facility design submittals, and a master drawings and master specifications list **per the requirements listed in the Condition**. The schedule shall contain the date of each submittal to the DCBO. To facilitate audits by the CEC staff, the project owner shall provide specific packages to the CPM upon request.	Submit to the DCBO and to the CPM for review and approval the schedule, and the master drawings and master specifications list of documents.	At least 60 days (or a date mutually agreed upon) prior to the start of rough grading for Later Works	Hydrostor to submit list prepared by Hatch to CPM	6/30/26	7/1/26	6/30/26: Strachan Consulting emailed Master Drawing & Spec Submittal List and Schedule to CPM and DCBO 7/1/26: DCBO approval. 8/21/26: Hatch confirmed submittal covered LW as well
GEN-3 *(p. A-2)*	The project owner shall make payments to the DCBO for design review, plan checks, construction inspections, and other applicable DCBO activities, based upon a reasonable fee schedule to be negotiated between the project owner and the DCBO **as set forth in the Condition.**	The project owner shall send a copy of the DCBO's receipt of payment to the CPM in the next MCR indicating that applicable fees have been paid.	Monthly in the MCR prepared by Hydrostor	Hydrostor	by 10th of each month		
GEN-4 *(p. A-3)*	If the resident engineer or the delegated engineers are reassigned or replaced, the project owner shall submit the name, qualifications, and registration number of the newly assigned engineer to the DCBO for review and approval.	Submit the required information to the DCBO for review and approval. The project owner shall notify the CPM of the DCBO's approval of the new engineer.	As required	Hatch	As required		
GEN-5(b) *(p. A-4)*	The project owner shall assign at least one of each of the following California registered engineers to the project: a design engineer who is either a structural engineer or a civil engineer fully competent and proficient in the design of project structures and equipment supports; a mechanical engineer; and an electrical engineer, and engineering geologist.**The transmission line may be the responsibility of a separate California registered electrical engineer.**	Submit the names, qualifications, and registration numbers of all responsible engineers assigned to the project to the DCBO for review and approval.	At least 30 days prior to the start of construction	Hatch	Still need engineeering geologist		

GEN-5(c) ***(p. A-4)***	If any one of the designated responsible engineers is subsequently reassigned or replaced, the project owner shall submit the name, qualifications and registration number of the newly assigned responsible engineer. The project owner shall notify the CPM of the DCBO's approval of the new engineer.	Submit the name, qualifications and registration number of the engineer to the DCBO for review and approval. The project owner shall notify the CPM of the DCBO's approval of the new engineer.	Within 5 days of replacing or reassigning an engineer	Hatch	As required		
GEN-6(a) ***(p. A-7)***	The project owner shall assign to the project, qualified and certified special inspector(s) who shall be responsible for the special inspections required by the 2022 Building Code. A certified weld inspector shall inspect welding performed on-site requiring special inspection (including structural, piping, tanks and pressure vessels). The special inspector **shall meet the requirements set forth in the condition**.	Submit the name and qualifications of the special inspector(s) to the DCBO for approval.	at least 15 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of an activity requiring special inspection	Hatch	As required		
GEN-6(b) ***(p. A-7)***	If the special inspector is subsequently reassigned or replaced, the project owner shall within five days submit the name and qualifications of the newly assigned special inspector to the DCBO for approval.	Submit the name and qualifications of the special inspector(s) to the DCBO for approval.	Within 5 days	Hatch	As required		
GEN-7 **(p. A-8)**	If any discrepancy in design and/or construction is discovered in any engineering work that has undergone DCBO design review and approval, the project owner shall document the discrepancy and recommend required corrective actions. The discrepancy documentation shall be submitted to the DCBO for review and approval. The discrepancy documentation shall reference this Condition of Certification and, if appropriate, applicable sections of the Building Code and/or other LORS.	The project owner shall transmit a copy of the DCBO's approval of any corrective action taken to resolve a discrepancy to the CPM in the next MCR. If any corrective action is disapproved, the project owner shall advise the CPM within five days of the reason for disapproval and the revised corrective action to obtain DCBO's approval.	As required, in each MCR prepared by Hydrostor	Hatch	by 10th of each month		

GEN-8(a) ***(p. A-8)***	The project owner shall obtain the DCBO's final approval of all completed work that has undergone DCBO design review and approval. The project owner shall request the DCBO to inspect the completed structure and review the submitted documents. The project owner shall notify the CPM after obtaining the DCBO's final approval. The project owner shall retain one set of approved engineering plans, specifications, and calculations (including all approved changes) at the project site, or at another accessible location, during the operating life of the project. Electronic copies of the approved plans, specifications, calculations, and marked-up as-built shall be provided to the DCBO for retention by the CPM.	Submit to the DCBO, with a copy to the CPM in the next MCR, (a) a written notice that the completed work is ready for final inspection, and (b) a signed statement that the work conforms to the final approved plans. After storing the final approved engineering plans, specifications, and calculations described above, the project owner shall submit to the CPM a letter stating both that the above documents have been stored and the storage location of those documents.	Within 15 days of the completion of any work Also in next MCR	Hatch	by 10th of each month		
GEN-8(b) ***(p. A-8)***	The project owner shall provide to the DCBO three sets of electronic copies of the above documents at the project owner's expense. These are to be provided in the form of "read only" files (the latest version of Adobe .pdf available), with restricted (password-protected) printing privileges.	Provide the specified sets of electronic copies.	Within 90 days of the completion of construction	Hatch	4/1/30		
GEO-2(a) ***(p. A-182)***	Final design and construction of underground openings shall be in accordance with **all applicable LORS listed in the Condition.**	The project owner shall submit to the DCBO the final design plans, specifications and calculations, with a copy of the transmittal letter to the CPM.	At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of any increment of excavation	Hatch and Cementation	TBD		
GEO-2(b) ***(p. A-182)***	The project owner shall submit to the CPM a copy of a statement from the DCBO that the proposed structural plans, specifications, and calculations were approved and comply with the requirements set forth in applicable engineering LORS.	Include the required information in the MCR.	Monthly in the MCR prepared by Hydrostor	WSP with input from Granite	by 10th of each month		

GEO-3 *(p. A-183)*	The project owner shall develop and implement an integrity inspection program for the excavated underground structures, including the cavern and vertical shafts. Program elements **shall include the items specified in the Condition**.	Submit to the DCBO and CPM the integrity inspection plan for review and approval.	At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of any increment of excavation	Hatch and Granite	TBD		
HAZ-3	The project owner shall report new or temporary hazardous waste generator numbers issued by the USEPA or California Department of Toxic Substances Control (DTSC) to the CPM prior to generating any hazardous waste during demolition or construction. Submittal of the notification and issued number documentation to the CPM is only needed once, unless there is a change in ownership, operation, waste generation, or waste characteristics that requires a new notification to USEPA.	Keep a copy of the ID#'s on file at the project site and provide documentation of the hazardous waste generation and notification and receipt of the number to the CPM in the next scheduled Monthly Compliance Report after receipt of the number. Documentation of any new or revised hazardous waste generation notifications or changes in identification number shall be provided to the CPM 30 days before the change occurs.	Monthly in the MCR prepared by Hydrostor	WSP with input from Granite	by 10th of each month		
HAZ-5 *(p. A-48)*	If changes are made to the site-specific Construction Security Plan , notify the CPM that changes have been made **(do NOT send the actual plan to the CEC--it is considered confidential).**	Notify the CPM that the plan has been revised.	As required	Hydrostor	As required		
HAZ-6(b)	Prepare an Soils Management Plan summary for the CPM after the completion of any ground disturbance.	Submit the SMP summary to the CPM.	Within 30 days of completion of any ground disturbance.	Granite	TBD		
HAZ-7 *(p. A-51)*	The project owner shall provide the resume of an experienced and qualified environmental professional who shall be available for consultation during site characterization (if needed), demolition, excavation, and grading activities. The qualified person shall be given full authority by the project owner to oversee any earth moving activities that have the potential to disturb contaminated soil and/or groundwater.	If a new person is selected for this role, submit the resume to the CPM for review and approval.	As soon as a new person is identified	WSP	As required		

HAZ-8 *(p. A-51)*	If suspected contaminated soil and/or groundwater is identified during site characterization, demolition, excavation, or grading at either the proposed site or linear facilities (as evidenced by discoloration, odor, detection by handheld instruments, or other signs), the qualified environmental professional shall inspect the site, determine the need for sampling to confirm the nature and extent of contamination, and provide a written report to the project owner, the Kern County Public Health Services Department - Hazardous Materials Program and the CPM stating the recommended course of action. Depending on the nature and extent of contamination, **the environmental professional shall have the authority to temporarily suspend construction activi**ty at that location for the protection of workers or the public. If, in the opinion of the environmental professional, significant remediation may be required, the project owner shall contact the CPM and representatives of the Kern County Public Health Services Department - Hazardous Materials Program and possible oversight.	The project owner shall submit any final reports filed by the environmental professional to the CPM. The project owner shall notify the CPM within 24 hours of any orders issued to halt construction.	within 5 days of their receipt	WSP with input from Granite	As required		
LAND-1 *(p. A-192)*	The project owner shall ensure that local regulations are complied with during construction and restoration of laydown and parking areas.	The project owner shall demonstrate compliance .	Ongoing during construction	Granite	Ongoing during construction		
LAND-2 *(p. A-192)*	The project owner shall develop a construction site plan (including the temporary rock crushing facility and concrete batch plant).	Submit any **updated construction site plan** to the Kern County Planning and Natural Resources Department for review and comment, and to the CPM for approval.	At least 60 days prior to any grading or development for the permanent project facilities	Hatch/Granite	As required		

LAND-4 (p. A-193)	The project owner shall file Form FAA 7460-1, "Notice of Construction or Alteration", for the main project facility structures, for construction equipment that meets the notice criteria of 14 CFR Part 77	The project owner shall comply with all FAA Determinations. The project owner shall obtain an FAA Determination of No Hazard prior to construction of the main project facility structures, erection of construction equipment that meets the notice criteria of 14 CFR Part 77. the project owner shall provide to the CPM copies of all FAA Determinations for the facilities to be constructed or erected.	At least 30 days prior to construction of the main project facility structures, erection of construction equipment, or any project feature requiring an FAA No Hazard Determination	Hydrostor	TBD		
MECH-1(a) ***(p. A-13)***	The project owner shall submit, for DCBO design review and approval, the proposed final design, specifications, and calculations for the project's mechanical-related components listed in the DCBO-approved master drawing and master specifications list. The submittal shall also include the project owner's Maintenance Program including all applicable Quality Assurance/Quality Control procedures and maintenance recommendations provided by all equipment manufacturers. Upon completion of construction of any such component, the project owner shall request the DCBO's inspection approval of that construction. *(See Condition language for further details.)*	The project owner shall submit to the DCBO for design review and approval the final plans, specifications, calculations, and Maintenance Program, including a copy of the signed and stamped statement from the responsible mechanical engineer certifying compliance with applicable LORS	At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of any increment of major mechanical-related components' construction listed in the DCBO-approved master drawing and master specs list	Hatch	TBD		
MECH-1(b) ***(p. A-13)***	The project owner shall transmit to the CPM, in the MCR following completion of any inspection, a copy of the transmittal letter conveying the DCBO's inspection approvals.	Submit the required information in the MCR.	Monthly in the MCR prepared by Hydrostor	Hatch	by 10th of the month		

MECH-2 *(P. A-14)*	The project owner shall submit to the DCBO for design review and approval the design plans, specifications, calculations, and quality control procedures for any heating, ventilating, air conditioning (HVAC) or refrigeration system. Packaged HVAC systems, where used, shall be identified with the appropriate manufacturer's data sheets. *(See Condition language for further details.*)	The project owner shall submit to the DCBO the required HVAC and refrigeration calculations, plans, and specifications, including a copy of the signed and stamped statement from the responsible mechanical engineer certifying compliance with the Building Code and other applicable codes, with a copy of the transmittal letter to the CPM.	At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of construction of any HVAC or refrigeration system	Hatch	TBD		
NOISE-2(a) *(p. A-198)*	Noise complaint process: Throughout the construction of the project, the project owner shall document, investigate, evaluate, and attempt to resolve all project-related noise complaints. The project owner or its authorized agent **shall implement all of the items listed in the Condition.**	File with the CPM the Noise Complaint Resolution Form, that documents the resolution of the complaint. If mitigation is required to resolve the complaint, and the complaint is not resolved within three business days, the project owner shall submit an updated Noise Complaint Resolution Form when the mitigation is implemented.	Within five days of receiving a noise complaint	Hydrostor with input from Granite	Ongoing during construction		
NOISE-2(b) *(p. A-198)*	Throughout the construction of the project, the project owner shall document, investigate, evaluate, and attempt to resolve all project-related noise complaints. The project owner or its authorized agent shall **follow the procedures set forth in the five bullet points in the condition language.**	Within five days of receiving a noise complaint, the project owner shall file with the CPM the Noise Complaint Resolution Form, that documents the resolution of the complaint. If mitigation is required to resolve the complaint, and the complaint is not resolved within three business days, the project owner shall submit an updated Noise Complaint Resolution Form when the mitigation is implemented.	As required	Hydrostor with input from Granite	Ongoing during construction		
NOISE-3 *(p. A-199)*	Employee Noise Control Program: The project owner shall submit a noise control program. The noise control program shall be used to reduce employee exposure to high (above permissible) noise levels during construction in accordance with Title 8, California Code of Regulations, Sections 5095-5099, and Title 29, Code of Federal Regulations, Section 1910.95.	The project owner shall make the program available to Cal-OSHA upon request.	Upon request	Granite	As required		

NOISE-6(a) *(p. A-200)*	Construction Noise Restrictions: Heavy equipment operation and noisy construction work relating to any project features, including linear facilities and pile driving within 1,000 feet of an occupied residential dwelling, and controlled detonations shall be restricted to the times delineated below: Mondays through Fridays: 6:00 A.M. to 9:00 P.M. Saturdays and Sundays: 8:00 A.M. to 9:00 P.M.	Construction work including construction of the access roads to the project site, pile driving, controlled detonations shall be performed in a manner that ensures excessive noise (noise that draws a project-related complaint) is prohibited and the potential for noise complaints is reduced as much as practicable.	Ongoing during construction	Granite	Ongoing during construction		
NOISE-6(b) *(p. A-200)*	Construction work including construction of the access roads to the project site, pile driving, controlled detonations shall be performed in a manner that ensures excessive noise (noise that draws a project-related complaint) is prohibited and the potential for noise complaints is reduced as much as practicable. Haul trucks and other engine-powered equipment shall be equipped with adequate mufflers and other state-required noise attenuation devices. Haul trucks shall be operated in accordance with posted speed limits. Truck engine exhaust brake use (jake braking) shall be limited to emergencies.	Haul trucks and other engine-powered equipment shall be equipped with adequate mufflers and other state-required noise attenuation devices. Haul trucks shall be operated in accordance with posted speed limits. Truck engine exhaust brake use (jake braking) shall be limited to emergencies.	Ongoing during construction	Granite	Ongoing during construction		The CEC Staff have agreed to allow controlled detonations on a 24/7 basis once a depth of 100 feet is reached.
NOISE-6(c) *(p. A-200)*	Avoid Controlled Detonations at Night. Controlled detonations shall be limited to daylight hours and shall terminate 30 minutes before sunset and shall not resume until 30 minutes after sunrise, unless authorized by the CPM. Sunrise and sunset times are established by the U.S. Naval Observatory Astronomical Applications Department for the geographic area where the project is located. The schedule of controlled detonations shall be provided to the CPM.		Ongoing during construction	Granite	Ongoing during construction		The CEC Staff have agreed to allow controlled detonations on a 24/7 basis once a depth of 100 feet is reached.
PAL-1 *(p. A-183)*	If the approved PRS is replaced prior to completion of project mitigation and submittal of the paleontological resources report (PRR), the project owner shall obtain CPM approval for the replacement PRS.	Submit the resume of the new proposed PRS to the CPM for review and approval.	The project owner shall keep resumes on file for the qualified PRSs and PRMs.	WSP	As required		

PAL-2(a) ***(p. A-185)***	If construction of the project proceeds in phases, maps and drawings may be submitted prior to the start of each phase. If there are planned changes to the footprint of the project, revised maps and drawings shall be provided to the PRS and CPM.	The project owner shall provide maps and drawings to the PRS and CPM for review and approval.	At least 30 days prior to the start of ground disturbance. For planned changes, at least 15 days prior to the start of ground disturbance.	WSP with input from Granite	Ongoing during construction		
PAL-2(b) ***(p. A-185)***	A letter identifying the proposed schedule of each project phase shall be provided to the PRS and CPM. Before work commences on affected phases, the Project owner shall notify the PRS and CPM of any construction phase scheduling changes.	At a minimum, the project owner shall ensure that the PRS or PRM consults weekly with the project superintendent and construction field manager to confirm area(s) to be worked the following week, until ground disturbance is completed.	Weekly during construction	WSP with input from Granite	Ongoing during construction		
PAL-3 ***(p. A-186)***	Paleontological Resources Monitoring and Mitigation Plan. The PRMMP shall function as the formal guide for monitoring, collecting, sampling, and reporting activities, and may be modified with CPM approval. The PRMMP shall be used as the basis of discussion when on-site decisions or changes are proposed.	Copies of the PRMMP shall include all updates and reside with the PRS, each PRM, the project's on-site manager, and the CPM.	Ongoing during construction	WSP	Ongoing during construction		
PAL-5 ***(p. A-187)***	Worker Environmental Awareness Program (WEAP): No worker shall excavate or perform any ground disturbance activity prior to receiving CPM-approved WEAP training by the PRS, unless specifically approved by the CPM. If an alternative trainer is required, that person's resume must be submnitted to the CPM for review and approval prior to being authorized to conduct training.	The project owner shall provide copies of the WEAP certification of completion forms with the names of those trained, trainer identification, and type of training (in-person and/or video) offered that month. The MCR shall also include a running total of all persons who have completed the training to date.	Monthly in the MCR prepared by Hydrostor	WSP	by the 10th of each month		
PAL-6(a) ***(p. A-189)***	The project owner shall ensure that the PRS and PRM(s) monitor all construction-related grading and excavation in areas where potential fossil-bearing materials were identified, both at the site and along any constructed linear facilities associated with the project. The project owner shall ensure that the PRM(s) keep a daily monitoring log of paleontological resource activities for submittal in the MCR by the PRS.	Any change of monitoring from the accepted schedule in the PRMMP shall be proposed in a letter or email from the PRS and the project owner to the CPM	Any change in monitoring shall be documented in the MCR prepared by Hydrostor	WSP	Ongoing during construction		

PAL-6(b) ***(p. A-189)***	The project owner shall ensure that the PRS and PRM(s) have the authority to stop or redirect construction if paleontological resources are encountered. The project owner shall ensure that there is no interference with monitoring activities unless directed by the PRS.	The project owner shall ensure that there is no interference with monitoring activities unless directed by the PRS.	Ongoing during construction	WSP with input from Granite	Ongoing during construction		
PAL-6(c) ***(p. A-189)***	For any significant paleontological resources encountered, either the project owner or the PRS shall notify the CPM within 24 hours. If the resources are encountered on a weekend or holiday, notification shall occur on the morning of the next business day.	In the event construction has been stopped because of a paleontological find, such notification shall be provided as soon as practical, but not later than 24 hours after a stop work order has been issued.	Within 24 hours, as required	WSP with input from Granite	As required		
PAL-6(d) ***(p. A-189)***	The project owner shall ensure that the PRS prepares a summary of monitoring and other paleontological activities to be included in each MCR. The summary shall include the name(s) of the PRS or PRM(s) active during the month, general descriptions of training and monitored construction activities, and general locations of excavations, grading, and other activities. A section of the report shall include the geologic units or subunits encountered, descriptions of samplings within each unit, and a list of identified fossils. **(Note: refer to full Condition Language regarding requirements for reporting Negative findings.)**	A copy of the daily monitoring log of paleontological resource activities shall be included in the MCR.	Monthly in the MCR prepared by Hydrostor	WSP	Daily during ground disturbance		
PAL-7 ***(p. A-189)***	The project owner shall ensure preparation of a paleontological resources report (PRR) by the designated PRS. The PRR shall be prepared following the completion of ground-disturbing activities.	The PRR shall include an analysis of the collected fossil materials **and the other items mention in the condition.** The PRR shall be submitted to the CPM under confidential cover to the CPM for review and approval.	Within 90 days after completion of ground-disturbing activities, including landscaping	WSP	4/1/30		

PAL-8 ***(p. A-189)***	The project owner, through the designated PRS, shall ensure that all components of the PRMMP are adequately performed, including collection of fossil material, preparation of fossil material for analysis, analysis of fossils, identification and inventory of fossils, preparation of fossils for curation, and delivery for curation of all significant paleontological resource materials encountered and collected during project construction. The project owner shall pay all curation fees charged by the museum for fossil material collected and curated because of paleontological mitigation. The project owner shall also provide the curator with documentation showing the project owner irrevocably and unconditionally donates, gives, and assigns permanent, absolute, and unconditional ownership of the fossil material.	The project owner shall submit documentation to the CPM identifying the entity that would be responsible for curating collected specimens. This documentation shall also show that fees were paid for curation and the owner relinquished control and ownership of all fossil material.	Within 60 days after the submittal of the PRR	WSP	5/31/30		
PUBLIC HEALTH-1 ***(p. A-34)***	Valley Fever Mgmt Plan requires ♦thorough cleaning of dust from equipment, vehicles and other items beofre moving off site; ♦whenever possible, phasing of grading and trenching work so that earth-moving equipment is working well ahead or downwind of workers on ground; ♦watering of area immediately behind grading or trading equipment; ♦if water truck runs of out water before dust is sufficiently dampened, ground workers exposed to dust shall leave area until a truck can resume water spraying; ♦to greatest extent possible, heavy-duty earth-moving vehicles shall be closed-cab and equippped with HEPA-filtered air system; ♦workers shall be trained in VF awarness and promptly report suspected symptoms of work-related VF to a supervior; a VF info handbook shall be provided to all onsite construction personnel; ♦onsite personnel shall be trained on proper use of PPE and provided with NIOSH-approved respiratory protection when exposure to dust is unavoidable.	The project owner shall provide the CPM a summary of all actions taken to maintain compliance with this items set forth in Items a-h of this condition. Evidence of VF training shall be provided to the Kern County Planning and Natural Resources Department	Monthly in the MCR prepared by Hydrostor	WSP	by the 10th of each month		
PUBLIC HEALTH-1 ***(p. A-34)***	Evidence of VF training shall be provided to the Kern County Planning and Natural Resources Department	Submit copies of the training acknolwedgement forms to the County.	Within 5 days of training session	Hydrostor	Within 5 days after training		

SOCIO-1 *(p. A-196)*	The project owner and its contractors shall make a good faith effort to hire at least 50 percent of their workers from local Kern County communities. The project owner shall provide the contractors a list of training programs that provide skilled workers and shall require the contractor to advertise locally for available jobs, notifying the training programs of job availability, all in conjunction with normal hiring practices of the contractor.	The project owner shall submit a letter to the CPM detailing the hiring efforts prior to commencement of construction, which encourages all contractors of the project site to hire at least 50 percent of their workers from local Kern County communities.	Adhere to this condition throughout hiring process	Granite / Hatch	Ongoing during construction		
SOLID WASTE-1	Document the actual waste management methods used during the year compared to the planned management methods.	Include the information as part of the Annual Compliance Report.	Annually in ACR prepared by Hydrostor	Granite	Annually		
STRUC-1(a) *(p. A-10)*	The project owner shall submit plans, calcs, and other supporting documentation to the DCBO for design review and acceptance for all project structures, systems, and equipment identified in the DCBO-approved master drawing and master specifications list. The design plans and calculations shall include the lateral force procedures and details as well as vertical calculations. Construction of any structure or component shall not begin until the DCBO has approved the lateral force procedures to be employed in designing that structure or component. **The project owner shall prepare Items 1-5 set forth in the condition.**	Submit to the DCBO the specified final plans and calculations, with a copy of the transmittal letter to the CPM.	At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of any increment of construction of any structure or component listed in the DCBO-approved master drawing and master specifications list	Hatch	TBD		
STRUC-1(b) *(p. A-10)*	The project owner shall submit a copy of a statement from the DCBO that the proposed structural plans, specifications, and calculations have been approved and comply with the requirements set forth in applicable engineering LORS.	Submit the required information to the CPM	Monthly in the MCR prepared by Hydrostor	Hatch / Granite	by the 10th of each month		

STRUC-2(a) ***(p. A-11)***	The project owner shall submit to the DCBO the required number of sets of documents related to work that has undergone DCBO design review and approval **for Items 1-5 set forth in the condition.**	If a discrepancy is discovered in any of the above documents, the project owner shall prepare and submit an NCR describing the nature of the discrepancies and the proposed corrective action to the DCBO, with a copy of the transmittal letter to the CPM. The NCR shall reference the Condition(s) of Certification and the applicable Building Code chapter and section. The project owner shall submit a copy of the corrective action to the DCBO and the CPM. The project owner shall transmit a copy of the DCBO's approval or disapproval of the corrective action to the CPM. If disapproved, the project owner shall advise the CPM within five days of the reason for disapproval and the revised corrective action to obtain DCBO's approval.	NCR: Within 5 days of discovery of discrepancy Copy of corrective action: Within 5 days of resolution of the NCR Copy of DCBO's approval or disapproval: to the CPM within 15 days If disapproved: advise the CPM within 5 days or reason and plan for resolution	Hatch	As required		
STRUC-3 ***(p. A-12)***	The project owner shall submit to the DCBO design changes to the final plans required by the 2022 Building Code, including the revised drawings, specifications, calculations, and a complete description of, and supporting rationale for, the proposed changes, and shall give to the DCBO prior notice of the intended filing.	The project owner shall notify the DCBO of the intended filing of design changes, and shall submit the required number of sets of revised drawings and the required number of copies of the other above-mentioned documents to the DCBO, with a copy of the transmittal letter to the CPM. The project owner shall notify the CPM, via the MCR, when the DCBO has approved the revised plans.	On a schedule suitable to the DCBO DCBO approvals shall be included in the MCR prepared by Hydrostor	Hatch	On a schedule suitable to the DCBO		

STRUC-4 ***(p. A-12)***	Tanks and vessels (if any) containing quantities of toxic or hazardous materials exceeding amounts specified in the 2022 Building Code shall, at a minimum, be designed to comply with the requirements of that chapter.	The project owner shall submit to the DCBO for design review and approval the final design plans, specifications, and calculations, including a copy of the signed and stamped engineer's certification. The project owner shall send copies of the DCBO approvals of plan checks and inspection approvals to the CPM in the MCR following receipt, following completion of any inspection.	At least 30 days (or a project owner and DCBO mutually agreed upon alternative time frame) prior to the start of installation tanks/vessels Include copies of DCBO approvals of plan checks and inspection approvals in the MCR.	Hatch	TBD		
TRANS-1(a) ***(p. A-194)***	Construction Traffic Management Plan (CTMP). Comply with the provisions of the CTMP which addresses the movement of workers, vehicles, equipment, and materials, including arrival and departure schedules, carpooling, a parking/staging plan, and designated workforce and delivery routes.	The CTMP shall include procedures to restore damage to existing roadways caused by project construction traffic, including corresponding traffic index calculations. The construction contractor shall work with Kern County and Caltrans to prepare a schedule and mitigation plan for the roadways along construction routes, in accordance with the procedures established by the CTMP.	Submit the plan to KC for review and approval 30 days prior to construction of Dawn Road	Hatch / Granite			Kern County issuance of Encroachment Permit states that Dawn Road construction cannot begin until the Construction Traffic Manaqgement Control Plan is submitted and approved by Kern County.
TRANS-1(b) ***(p. A-194)***	The CTMP shall include measures to ensure safe ingress and egress at the project access intersections. Measures may include removal of vegetation to provide unobstructed line of sight, addition of advanced warning signs, and active work zone traffic control/traffic management as approved by the CPM.	Ongoing during construction	As required	Granite			

TRANS-2	Prior to the commencement of operations, the project owner shall pave Dawn Road from the project entrance westerly to the Caltrans boundary at SR 14. The paving shall meet Type B Standards, including a 60-foot-wide roadway with paved shoulders, structural sections suitable for heavy truck traffic, and asphalt concrete surfacing and necessary tie-ins. The project owner shall ensure that site access intersections and corresponding roadway and parking improvements are designed according to standards adopted by Kern County and, where applicable, Caltrans, to ensure safe ingress and egress at the project access intersections during the construction and operation phases.	The project owner shall obtain an encroachment permit from the Kern County Public Works Department and pave Dawn Road from the project entrance west to the Caltrans right-of-way at SR 14. The project owner shall also obtain an encroachment permit from Caltrans prior to construction for any site access improvements within Caltrans right-of-way.	Prior to the commencement of operations	Granite / Hatch			8/19/26: CEC issued Conditional approval requiring submittal of a Petition to Amend the License which includes Kern County endorsement of language modifications to TRANS-2.
TRANS-3 ***(p. A-196)***	The project owner shall comply with limitations imposed by Caltrans and other relevant jurisdictions, including the Kern County, on vehicle sizes, weights, driver licensing, and truck routes.	The project owner shall retain copies of permits and supporting documents on-site for CPM inspection if requested.	Ongoing during construction	Granite	Ongoing during construction		
TRANS-4 ***(p. A-196)***	The project owner shall ensure that contracts with third party vendors include a representation that any permits and/or licenses are secured from the relevant administering agency, including Kern County, Caltrans, and CHP for the transport of hazardous materials.	The project owner shall include in its monthly compliance reports copies of all permits/licenses acquired by the project owner and/or vendors concerning the transport of hazardous substances.	Monthly in the MCR prepared by Hydrostor	Granite / Hatch	by the 10th of each month		
VIS-1(a) ***(p. A-201)***	Exterior Surface Coatings/Colors/Finishes/Materials Plan: The project owner shall not purchase product or service from a vendor for the project exterior surface coatings, colors, finishes, materials prior to CPM approval of the exterior surface coating, color, finish, and materials plan. ***Refer to Condition for detailed language on plan requirements.***	Submit the plan to the CPM for approval and simultaneously to the Director of Planning and Natural Resources Department for the County of Kern for review and comment.	90 days prior to executing a contract to purchase coating, color, finish and materials with a vendor	Granite / Hatch	TBD		
VIS-1(b) ***(p. A-201)***	If the CPM determines that the exterior surface coating, color, finish, requires a revision, submit a revised plan.	Provide to the CPM a plan with the specified revision(s) for approval by the CPM	before any action or activity with the vendor is executed. Any revision to the plan must be approved by the CPM.	Granite / Hatch	As required		

VIS-1(c) *(p. A-201)*	Exterior surface coatings, colors, finishes, and materials shall be installed/applied (completed) on the exterior surfaces of the large/major buildings, equipment, and structures.	The project owner shall notify the CPM that exterior surface coatings, colors, and finishes of all listed buildings, equipment, and structures has been completed are ready for inspection.	When ready for inspection	Granite / Hatch	TBD		
VIS-1(d) *(p. A-201)*	The project owner shall supply to the CPM a set of color photographs showing the project from the key observation points evaluated for the project certification, and individual color photographs showing the completed exterior surface coatings, colors, finishes, and materials for the following: six spherical hot water tanks, four low pressure exhaust stacks, two closed cooling water tanks, the administration/control room and maintenance building, and one aboveground transmission gen-tie pole structure on the route along Rosamond Boulevard, near LADWP overhead transmission line route easement, and any other building, equipment, and structure as requested by the CPM.	Color photographs may be electronically filed or manually filed on electronic media.	When complete	Granite / Hatch	TBD		
VIS-2(a) (p. A-203)	Outdoor signs installed on the project site and the construction laydown, parking and storage areas shall comply with the sign regulations of the applicable base zone district and Chapter 19.84 of the County of Kern Zoning ordinance. The project owner shall prepare a signage plan for the project, project site, and construction laydown,	Submit to the CPM for approval and simultaneously to the Director of Planning and Natural Resources Department for the County of Kern for review and comment. The CPM shall provide the Director of Planning and Natural Resources Department	30 days prior to installation of any signs	Granite / Hatch	Complete		7/9/26: CEC approved sign design - must ensure signs are replaced if they become unredable due to weather conditions.
VIS-2(b) *(p. A-203)*	If the CPM determines that the sign or signage plan requires a revision, the project owner shall provide to the CPM a plan with the specified revision(s) for approval by the CPM before any installation of a sign.	Any revision to the plan must be approved by the CPM.	As required	Granite / Hatch	As required		

VIS-3(a) *(p. A-204)*	The project owner shall submit to the CPM for approval and simultaneously to the Director of Planning and Natural Resources Department for the County of Kern for review and comment a light pollution control plan or equivalent plan prepared for the project that satisfy the above requirements **and include the information set forth in items 1-2 of the Condition.**	Submit the plan to the CPM for approval and simultaneously to Director of Planning and Natural Resources Department for the County of Kern for review and comment ninety (90) days prior to executing a contract to purchase permanent outdoor luminaires for the project. The CPM shall provide the Director of Planning and Natural Resources Department at least 30 days to review the plan and provide comments to the applicant and the CPM.	90 days prior to executing a contract to purchase permanent outdoor luminaires for the project	Granite / Hatch	TBD		
VIS-3(b) *(p. A-204)*	If the CPM determines the light pollution control plan requires a revision, the project owner shall provide to the CPM a plan with the specified revision(s) for approval by the CPM before any action or activity with the vendor is executed.	Any revision to the plan must be approved by the CPM.	As required	Granite / Hatch	As required		
VIS-3(c) *(p. A-204)*	The project owner shall notify the CPM when the installation of the luminaires has been completed and are ready for inspection.	After inspection if the CPM requires a modification to a luminaire(s) (e.g., design, installation, location), the project owner shall have 30 days after receiving the notification to complete the modification and request a follow-up inspection.	As required	Granite / Hatch	TBD		
VIS-3(d) *(p. A-204)*	If a light and glare complaint is filed with the project owner, the project owner shall supply the CPM with a completed complaint resolution form report as specified in the Compliance Conditions of Certification, a proposal to resolve the complaint and time schedule for resolution.	Supply the CPM with a completed complaint resolution form report as specified in the Compliance Conditions of Certification, a proposal to resolve the complaint and time schedule for resolution.	within 48 hours of completing/resolving the complaint	Granite / Hatch	As required		
WATER-1 *(p. A-151)*	Prepare a Drainage Erosion and Sedimentation Control Plan (DESCP) and Storrmwater Management Plan for managing stormwater during Project construction	Submit the DESCP to the CPM for review and to KC and Lahontan RWQCB, if required.	No later than 45 days prior to the October 1, 2026 rainy season for Early Works	WSP with input from Granite	In progress; need final approval in order to obtain Full NTP		8/18/26: WSP emailed Rev1 of DESCP to CPM and DCBO; CEC approved with request that Figures 4-1 through 4-5 and Figures 5-1 and 5-2 be stamped by a PE. DCBO indicated critical deliverablesi in response to DCBO initial comments on SW Mgmt Design for EW Phase 1, DESCP, and all CIV-1 dcouments that DCBO must be provided and approved prior to issuance of Full NTP.

WATER-1 ***(p. A-151)***	Best Management Practices Plan – The DESCP shall be consistent with the grading and drainage plan as required by Condition of Certification CIVIL-1, and relevant portions of the DESCP shall clearly show approval by the chief building official. Monitoring activities shall include routine measurement of the volume of accumulated sediment in the onsite drainage ditches and storm water diversions.	The Project owner shall provide in the Monthly Compliance Report with a narrative on the effectiveness of the drainage, erosion, and sediment-control measures and the results of monitoring and maintenance activities.	Monthly in the MCR prepared by Hydrostor	WSP with input from Granite	by the 10th of each month		
WATER-2(a) ***(p. A-153)***	The project owner shall submit to Lahontan RWQCB all necessary information and pay applicable fees.	Pay fees and submit applicable documents.	At least 60 days prior to contruction of the gen-tie line	Hydrostor with Quanta	10/2/27		
WATER-2(b) ***(p. A-153)***	The project owner shall submit to the CPM and Lahontan RWQCB for review and approval all plans to control the potential impacts to ephemeral streams from fill and excavation activities associated with construction of the gen-tie line.	Submit the required plans to the CPM and Lahontan RWQCB for review and approval.	at least 30 days prior to construction of the gen-tie line	Quanta	11/1/27		
WATER-2(c) ***(p. A-153)***	The project owner shall submit to the CPM any correspondence with the SWRCB or the Lahontan RWQCB regarding this activity. ***The Lahontan RWQCB's WDRs are located in this matrix following WATER-7.***	The project owner shall notify the CPM in writing of any violations and include these in the Annual Compliance Report. Any monitoring documentation associated with the SWRCB Order shall be included in the Annual Compliance Report.	As required Also annally in the ACR prepared by Hydrostor	WSP with input from Granite	Within 10 days of its mailing or receipt		
WATER-3(a) ***(p. A-154)***	Offsite Wastewater Disposal: If the project owner does not elect to treat sanitary wastewater using an onsite leach-line septic system, this wastewater shall also be disposed offsite. To verify operational wastewater streams are to be disposed in accordance with Federal, State and local regulations, the project owner shall document all aspects of offsite wastewater disposal.	The project owner shall provide a copy of the service agreement with the vendor selected for offsite industrial wastewater disposal, and/or sanitary wastewater disposal if applicable.	No less than 30 days prior to project operation	WSP with input from Granite	12/2/29		
WATER-3(b) ***(p. A-154)***	The project owner shall provide any non-hazardous manifest, bill-of-lading, or any other shipping documentation associated with offsite wastewater disposal.	Submit the required information to the CPM	Within ten (10) days of offsite shipment	Granite	As required		
WATER-3(c) ***(p. A-154)***	The project owner shall provide any correspondence with the third party offsite wastewater disposal vendor, and any agencies or interested parties regarding offsite wastewater disposal.	Submit the required information to the CPM	Within ten (10) days of its mailing or receipt	Hatch and Granite	As required		

WATER-3(d) ***(p. A-154)***	The project owner shall notify the CPM in writing of any violations and include these in the annual compliance report. The project owner shall include all offsite wastewater disposal shipping documentation in the annual compliance report.	Submit the required information in the ACR.	Annually in ACR prepared by Hydrostor	Granite, Hatch and WSP	Annually		
WATER-4(a) ***(p. A-15)***	Onsite Septic System Permit Requirements. If the project owner elects to treat sanitary wastewater using an onsite leach-line septic system, an on-site septic system designed for site-specific soil and percolation conditions shall be installed. The septic system design shall comply with the SWRCB's onsite wastewater treatment system (OWTS) policy (SWRCB 2023) and Kern County Environmental Health Division (KCEPH) OWTS ordinance Chapter 8.62.	Submit to the CPM evidence that that the septic system design has been reviewed by the KCEPH and the approval of the DCBO	No later than 90 days prior to project operation	Hatch	10/3/29		
WATER-4(b) ***(p. A-15)***	Septic system design (continued)	Submit the operations and maintenance manual to the KCEPH for review and comment, including copies of any agency comments the project owner has received.	No later than 60 days prior to project operation	Hatch	11/2/29		
WATER-4(c) ***(p. A-15)***	Septic system design (continued)	Submit the operations and maintenance manual to the KCEPH for review and comment, including copies of any agency comments the project owner has received.	No later than 30 days prior to project operation	Hatch	12/2/29		
WATER-4(d) ***(p. A-15)***	The wastewater system shall be monitored following either the general standards adopted in SWRCB's OWTS regulations or the procedures outlined in the CPM-approved operations and maintenance manual.	Monitor as required.	Ongoing	Hatch	Ongoing		
WATER-5(a) ***(p. A-155)***	Jurisdictional Dam Construction Requirements. The HC-reservoir embankment is subject to the review and approval of all design and specifications that would be administered by the Department of Water Resources Division of Safety of Dams (DWR-DSOD). **The Project must comply with the Dam Safety Program Requirements as set forth in Items 1-8 of the condition.**	The project owner shall obtain CEC approval in consultation with DWR-DSOD of dam plans and specifications prior to commencing construction of the HC-reservoir embankment in accordance with Water Code section 6200.	Ongoing	Granite, Hatch and WSP	Ongoing		

WATER-5(b) ***(p. A-156)***	The project owner shall obtain CEC approval in consultation with DWR-DSOD of dam plans and specifications prior to commencing construction of the HC-reservoir embankment in accordance with Water Code section 6200. The project owner shall provide the CEC in consultation with DWR-DSOD with information to achieve the following milestones of the design approval process **as set forth in Items 1-6 of the condition.**	The project owner shall provide the CEC in consultation with DWR-DSOD with information to achieve the following milestones of the design approval process **as set forth in Items 1-6 of the condition.**	Ongoing	WSP with input from Granite	Ongoing		
WATER-5(c) ***(p. A-156)***	Following the conclusion of milestone 6, the CPM in consultation with DWR-DSOD shall approve the design application and conditions of the HC-reservoir after it is demonstrated to the satisfaction of DWR-DSOD that all Water Code provisions and applicable engineering standards applicable to the hydrostatic compensating reservoir embankment are met.	Construction of the HC-reservoir embankment shall not commence prior to CPM approval and must commence within one year of CPM approval (Water Code section 6265).	Obtain CPM approval of reservoir design	WSP with input from Granite	TBD		
WATER-5(d) ***(p. A-156)***	The inundation map approved by the CEC in consultation with DWR-DSOD, would be included with a draft emergency action plan (EAP) submitted to the California Office of Emergency Services (CalOES) prior to the reservoir being certified.	Any documents submitted to the DWR-DSOD including but not limited to application materials, geotechnical reports, design drawings, pictures, soil studies, or hazards analysis, shall be provided contemporaneously to the CPM and DWR-DSOD for review.	Obtain CPM approval of reservoir design	WSP with input from Granite	Ongoing		
WATER-5(e) ***(p. A-156)***	Consistent with DSOD's existing statutory and regulatory enforcement authority regarding the design, construction, and operations of the HC-reservoir embankment, the CEC and DWR-DSOD will confer with each other and coordinate, as needed, in the enforcement of the requirements. The project owner shall pay the DWR-DSOD any application and annual fees in accordance with the Dam Safety Program Requirements to facilitate the DWR-DSOD's ability to perform design review, construction monitoring, safety inspections, and other work associated with the construction and operations of the dam.	The project owner shall provide evidence to the CPM of payment to DWR-DSOD of all ANNUAL fees required under the Dam Safety Program Requirements.	within 10 days of payment or any alternate funding agreement executed between the project owner and DWR-DSOD	Hydrostor	6/1/27		First payment was on 6/1/26

WATER-6(a) ***(p-158)***	Before submitting the initial engineering designs for the HC-reservoir, the project owner shall furnish the CPM and the DWR-DSOD with a schedule of design submittals, master drawings and master specifications list. The master drawings and master specifications list shall contain a list of proposed submittal packages of designs, calculations, and specifications for major structures, systems, and equipment. The schedule shall contain the date of each submittal to the CPM and DWR-DSOD.	The project owner shall provide the schedule to the DWR-DSOD and CPM. Major structures and equipment shall not be added to or deleted from the list without CPM and DWR-DSOD approval.	at least 60 days (or an alternative time frame approved by the CPM) prior to the start of construction of the HC-reservoir. Updates: Monthly in the MCR	WSP with input from Granite	12/31/26		
WATER-6(b) ***(p-158)***	Upon completion of the HC-reservoir embankment construction, the project owner shall request approval from the CPM to impound water.	Filling of the HC-reservoir shall not commence until approval by the CPM in consultation with the DWR-DSOD.	Upon completion of the reservoir embankment construction	WSP with input from Granite	6/1/29		
WATER-6	Delegation to Department of Water Resources Division of Safety of Dams. The CEC delegates compliance and design verification for the dam safety related construction inspection of the HC-reservoir embankment and related dam safety components approved by the CEC, to the DWR-DSOD, with ongoing guidance from the CPM. Such delegation will be memorialized in a memorandum of understanding between the CEC and DWR-DSOD to detail the responsibilities of the agencies and project owner pursuant to WATER-5, WATER-6, and the Dam Safety Program.	Compliance and design verification for the hydrostatic compensation reservoir system is delegated to the DWR-DSOD inspection team with guidance from the CPM, who will be communicating approvals to the project owner.	Continue to submit design criteria to DWS-DSOC and copied to CPM	WSP with input from Granite	Ongoing during design		4/27/26: Application for Dam Construction Permit, 30% Plan Set, and 30% Design Criteria submitted to DWR-DSOD and copied to CPM
WATER-7 ***(p. A-159)***	Total water use during the 5-year construction period shall not exceed 1,400 acre-feet (AF). The project owner shall record daily water use for the project's construction. The project owner shall comply with the water use limits and reporting requirements described below.	During project construction, the MCR shall include a summary of monthly water use. The project's annual compliance report shall include a monthly and annual summary of water use identifying construction or operations and water source.	Monthly in the MCR prepared by Hydrostor	WSP with input from Granite	by the 10th of each month		

Lahontan RWQCB WDRs (p. A.A-2 through A.A-3)	NOTE TO READER: REFER TO APPENDIX A Attachment A for full detailed language of Lahontan RWQCB's Waste Dischrage Requirements for the project. **What follows is only a summary.** The discharges of waste from the Willow Rock Energy Storage Center project must be in accordance with the requirements contained in Lahontan RWQCB's Waste Discharge Requirements (WDRs). These WDRs are applicable to the following types of wastes: boring wastes generated during shaft construction, fill and excavation wastes discharged to surface waters during gen-tie construction, and stormwater generated during construction. Refer to Section A. Definitions and Section B. Prohibitions.		Ongoing during construction	WSP with input from Granite	See Water-1		
Lahontan RWQCB WDRs (p. A.A-3 through A.A-5)	Section C. Requirements for Boring Waste Discharges: 1. Discharges of boring waste must be discharged to onsite temporary lined ponds and must not contain halogenated solvents. 2. The temporary lined ponds must be sufficiently sized and constructed of impervious materials to contain the boring waste without overtopping or through leakage from the liner. 3. The temporary lined pond(s) must be protected against erosion, overland runoff, and other impacts resulting from storm events. 4. During drilling operations, the Applicant must monitor the boring waste discharges as set forth in C.4. 5 .For the data collected in C.4, the Applicant must evaluate the analytical results for the pond solids to determine if they are hazardous or non-hazardous waste as defined in the requirement (see Items a-e and Table 1.) 6. The Applicant must comply with the General Monitoring Provisions in Section G. 7. At the end of drilling operations, the Applicant must remove all free liquid from the temporary lined pond and collect and analyze a representative sample of the pond solids in accordance with C.4 and then evaluate the analytical data in accordance with C.5. See I. and ii. for disposal options.		Ongoing during construction	WSP with input from Granite	See Water-1		

Lahontan RWQCB WDRs (p. A.A-5)	Section D. Requirements for Fill and Excavation Discharges to Surface Waters: Impacts to ephemeral streams will result from fill and excavation activities associated with construction access and staging areas for the installation of the power poles along the gen-tie electrical transmission line. 1. The authorized impacts to ephemeral streams total 0.11 acres and 1,705 linear feet. 2. The Applicant must restore the impacted areas by regrading to pre-project contours and revegetating with an appropriate native seed mix. a) Adaptive measures such as reseeding, supplemental irrigation, and removal of non-native plant species must be taken to promote success of the revegetation. b) Annual monitoring of the restored areas must continue until all the revegetation success criteria have been met. c) Revegetation success criteria are: i) At least 70% vegetation cover of native species; ii) Less than 5% vegetation cover of non-native species; and iii) Absence of rills and other signs of erosion.			WSP with input from Granite	See Water-1		
Lahontan RWQCB WDRs (p. A.A-5 to A.A-6)	Section E. Requirements for Stormwater Discharges: Stormwater must be managed throughout construction to minimize erosion and the discharge of sediment laden water offsite. Temporary sediment and erosion control best management practices (BMPs) must be implemented until permanent soil stabilization is in place and good housekeeping practices must be implemented to minimize the potential for non-stormwater discharges to degrade water quality.		Ongoing during construction	WSP with input from Granite	See Water-1		
Lahontan RWQCB WDRs (p. A.A-6)	Section E.1: The Applicant must install appropriate BMPs including construction storm water controls designed to minimize degradation of water quality. BMPs will include, but not be limited to, fiber rolls staked or weighted down with sand or gravel bags, silt fencing, a temporary detention basin, and/or weed-free hay bales staked to the ground with rebar or other suitable device.		Ongoing during construction	WSP with input from Granite	See Water-1		

Lahontan RWQCB WDRs (p. A.A-6)	Section E.2: The Applicant must develop a BMP implementation plan (BMP Plan) and install temporary erosion control facilities to prevent transport of earthen materials and other wastes off the property. Guidance for developing the BMP Plan is provided in Appendix 1, Best Management Practices Plan.		Section E.3: & 4: The BMP Plan must be implemented upon commencement of construction and at all times during construction	WSP with input from Granite	See Water-1		
Lahontan RWQCB WDRs (p. A.A-6 through A.A-7)	Section E.5: All land disturbing actiivities must be conducted in accordance with the Temporary Construction BMPs and Permanent Construct BMPs set forth in a.i-vii and b.i-iv.			WSP with input from Granite	See Water-1		
Lahontan RWQCB WDRs (p. A.A-7)	Section E.6: Should it be determined by the Applicant, CEC, or Lahontan Water Board staff that stormwater discharges and/or authorized non-stormwater discharges are causing or contributing to a violation of an applicable water quality standard, the Applicant must: a. Implement corrective measures immediately following discovery that water quality standards were violated; and b. Revise the BMP Plan and monitoring procedures to incorporate: 1) additional BMPs that have been and will be implemented; 2) the implementation schedule; and 3) any additional monitoring needed..			WSP with input from Granite	See Water-1		
Lahontan RWQCB WDRs (p. A.A-7 through A.A-8)	Section E.7: An inspection of the construction site must be made daily during active construction and monthly during long periods of inactivity (e.g. winter), by the Applicant, resident engineer, superintendent, general contractor, or equivalent. The purpose of the inspection is to discover potential water quality problems at the construction site so that the Applicant can implement corrective measures. Items a-j must be inspected at the site, as applicable.			WSP with input from Granite	See Water-1		

Lahontan RWQCB WDRs (p. A.A-8 through A.A-9)	Section F: Standard Provisions: refer to items 1 - 10.			WSP with input from Granite	See Water-1		
Lahontan RWQCB WDRs (p. A.A-9 through A.A-10)	Section G: General Monitoring Provisions: refer to Items 1-7.			WSP with input from Granite	See Water-1		
Lahontan RWQCB WDRs (p. A.A-10 through A.A-11)	Section H: Reporting Requirements: see detailed list of requirements in Items 1 and 2.			WSP with input from Granite	See Water-1		
WORKER SAFETY-1(a) ***(p. A-36)***	The Construction Exposure Monitoring Program shall include a Sampling and Analysis Plan for monitoring wastewater from the cavern initial access construction if Method 1 is chosen, and a Sampling and Analysis Plan for routine sampling of excavated dust, soil, and rock removed from the cavern for the determination of hazardous wastes.	Submit the plan to the CPM for review and approval concerning compliance with all applicable safety orders.	At least 90 days prior to the start of cavern construction	WSP with input from Granite	9/2/28		

WORKER SAFETY-1(b) *(p. A-36)*	Rock Crusher Safety Program that includes a dust and particulate emissions controls	Submit the plan to the CPM for review and approval concerning compliance with all applicable safety orders.	At least 90 days prior to the start of cavern construction	WSP with input from Granite	9/2/28		
WORKER SAFETY-1(c) *(p. A-36)*	Concrete Batch Plant Safety Program	Submit the plan to the CPM for review and approval concerning compliance with all applicable safety orders.	At least 90 days prior to the start of cavern construction	WSP with input from Granite	9/2/28		
WORKER SAFETY-1(d) *(p. A-36)*	Mining Safety and Health Plan that demonstrates compliance with all applicable MSHA regulations for the construction of the underground cavern	Submit the plan to the CPM for review and approval concerning compliance with all applicable safety orders.	At least 90 days prior to the start of cavern construction	WSP with input from Granite	9/2/28		
WORKER SAFETY-1(e) *(p. A-36)*	6. Construction Emergency Action Plan	Submit to the CPM for approval	At least 90 days prior to start of construction	WSP	8/25/26		8/20/26: DCBO Conditional Approval - entry for Willow Rock Supervisor on Table 4 needed to be completed. 8/26/26: WSP submitted Rev. 3 to DCBO 8/27/26: Approved by DCBO
WORKER SAFETY-1(e) *(p. A-36)*	7. Emergency Response Plan	Submit to the KCFD for review and comment, then submit to the CPM for approval	At least 90 days prior to the start of construction	WSP	8/25/26		8/3/26: WSP submitted Rev 8/17/26: DCBO Conditional Approval: Emergency Contact List (Table 4) - entry for Utilities Contact is blank 8/26/26: WSP submitted Rev.3 to DCBO 8/27/26: Approved by DCBO

WORKER SAFETY-1(e) ***(p. A-36)***	11. Construction Fire Prevention Plan that includes thoroughly detailed Fire Detection and Suppression Plans for surface construction activities, Emergency Rescue Plans for surface construction, and methods of access for emergency responders through locked gates at the surface.	Submit to the KCFD for review and comment, then submit to the CPM for approval	At least 90 days prior to the start of construction	WSP	8/25/26		8/14/26: WSP transmitted Rev2 to CPM and DCBO 8/17/16: DCBO Conditional Approval--see DCBO comment letter addressing 4 comment areas
WORKER SAFETY-3 ***(p. A-38)***	The project owner shall provide a site Construction Safety Supervisor (CSS) who, by way of training and/or experience, is knowledgeable of compressed air energy projects, worker safety issues concerning underground mining, and relevant worker safety-related LORS. The CSS shall be capable of identifying workplace hazards relating to the construction activities; and has authority to take appropriate action to ensure compliance and mitigate hazards. The CSS shall: --have overall authority for coordination and implementation of all occupational safety and health practices, policies, and programs; --ensure that the safety program for the project complies with Cal OSHA and federal regulations related to A-CAES projects; --ensure that all construction and commissioning workers and supervisors receive adequate safety training; --conduct accident and safety-related incident investigations and provide emergency response reports for injuries, and inform the CPM of safety-related incidents; and --ensure that all the plans identified in WORKER SAFETY- 1 and WORKER SAFETY-2 are implemented.	The CSS shall submit in the Monthly Compliance Report (MCR) a monthly safety inspection report to include: --a record of all employees trained for that month (all records shall be kept on site for the duration of the project); --summary report of safety management actions and safety-related incidents that occurred during the month; --report of any continuing or unresolved situations and incidents that may pose danger to life or health; --report of any visits from Cal OSHA and/or any complaints from workers to Cal OSHA; and --report of accidents, injuries, and near misses that occurred during the month.	Monthly in the MCR prepared by Hydrostor	Hatch	by the 10th of each month		8/25/26: Strachan Consulting submitted resumes for Joseph Chesno and Shawn Henderson 8/28/26: Interim/back-up CSS Joseph Chesno Approved 9/1/26: Shawn Henderson approved for aboveground work. **Note: Resume will need to be submitted for CSS for mining and tunneling.**

WORKER SAFETY-4 ***(p. A-39)***	The project owner shall make payments to the DCBO for the services of a Safety Monitor based upon a reasonable fee schedule to be negotiated between the project owner and the DCBO. Those services shall be in addition to other work performed by the DCBO. The Safety Monitor shall be selected from an independent company not affiliated with the DCBO and report directly to the DCBO and would be responsible for verifying that the CSS, as required in WORKER SAFETY-3, implements all appropriate Cal OSHA and CEC safety requirements. The Safety Monitor shall conduct on-site (including linear facilities) safety inspections at intervals necessary to fulfill those responsibilities.	The project owner shall provide proof of its agreement to fund the Safety Monitor services to the CPM for review and approval.	At least 60 days prior to the start of construction	Granite	8/25/26		
WORKER SAFETY-5 ***(p. A-39)***	The project owner shall submit the Construction Controlled Detonations Plan that contains a complete description of how explosives would be safely transported and used at the site, evacuation, security and fire prevention procedures, a blasting equipment list, and procedures for notification of nearby receptors. **The plan shall address Items 1-4 as set forth in the Condition.**	The Controlled Detonations Plan shall be submitted to the KCFD and the KCSO for review and comment prior to submittal to the CPM for approval.	At least 90 days prior to start of construction work that involves controlled detonations	Granite, Hatch and WSP	6/3/27		
WORKER SAFETY-6(a) ***(p. A-39)***	Prior to the use of AVEK supplied water for dust control and surface soils, have a state certified laboratory conduct laboratory testing of hexavalent chromium or provide equivalent analsyis if available from AVEK.	Submit both the SAP and lab results to the CPM for review and approval.	At least 30 days prior to the planned use of the AVEK supplied water	Granite	7/20/26		
WORKER SAFETY-6(b) ***(p. A-39)***	Sampling and analysis shall be repeated at least every six months.	Submit the results to the CPM for review.	At least every six months	Granite	Every 6 months		

WORKER SAFETY-7 ***(p. A-42)***	The project owner shall implement a worker Valley Fever Prevention and Response Plan that includes an enhanced Dust Control Plan containing the requirements described in AQ-SC3.	Plan requires 1) mandatory onsite use of earth moving and excavating equipment with environmental cabs (with A/C and HEPA filters) and keeping doors of cab closed; 2) mandatory site worker use of dust masksin areas were trenching occurs, even if dust not detected; 3) use of watering (no less than 3xday) and dust supression chemicals immediately when dust comes from or onto site; 4) FV awareness training; 5) medical referral protocol; and 6) reporting of medically-diagnosed cases to CDPH, CalOSHA and CPM.	Implement all provisions of the plan during construction	WSP	Ongoing		
WORKER SAFETY-8 ***(p. A-43)***	The project owner shall prepare and implement a detailed comprehensive Construction Underground Fire Protection Plan which shall include the following sections: 1, Pre-planning and hazard identification; 2. ventilation control; 3. Combustible material man; 4. Fire detection and alarm systems; 5. Fire suppression systems; 5. Emergency Response Plan that includes evacuation procedures and refuge chambers; 7. Compliance with regulations from Cal OSHA, MSHA, and NFPA 122; 8. Worker and Management Training; 9. Regular inspections and maintenance	Provide to the KCFD a copy of the plan for review and comment and to the CPM for review and approval.	At least 90 days prior to the start of mobilization of underground cavern construction activities	WSP	9/2/28		
WORKER SAFETY-9 ***(p. A-44)***	The project owner shall adhere to all applicable provisions of the latest version of NFPA 850: Recommended Practice for Fire Protection for Electric Generating Plants and High Voltage Direct Current Converter Stations, and NFPA 122: Standard for Fire Prevention and Control in Metal/Nonmetal Mining and Metal Mineral Processing Facilities, as the minimum level of fire protection. The project owner shall interpret and adhere to all applicable NFPA 850 and NFPA 122 recommended provisions and actions stating “should” as “shall.” In any situations where both NFPA 850, NFPA 122, and the state or local LORS have application, the more restrictive shall apply.	The project owner shall ensure that the project adheres to all applicable provisions of NFPA 850 and NFPA 122.The project owner shall provide all fire protection system specifications and drawings to the KCFD for review and comment, to the CPM for review and approval, and to the DCBO for plan check approval and construction inspection.	At least 90 days prior to the start of construction of the fire protection system	Granite	TBD		

WORKER SAFETY-10 ***(p. A-44)***	The project owner shall ensure that a portable automated external defibrillator (AED) is on site during construction and shall implement a program to ensure that workers are properly trained in its use and that the equipment is properly maintained and functional. The following persons shall be trained in its use and shall be on site whenever the workers that they supervise are on site: the Construction Project Manager or delegate, the CSS or delegate, and all shift foremen.	Submit to the CPM proof that a portable AED is available to be made available on site as soon as physically possible along with a copy of the training and maintenance program for review and approval.	Ongoing during construction	Granite	7/10/26	7/13/26	7/10/26: Strachan Consulting emailed to the CPM 7/13/26: CPM email approval
WORKER SAFETY-11 ***(p. A-44)***	The project owner shall do the following at the project site: 1) Provide at least two gates into the facility wide enough for emergency access with both equipped with Knox Boxes for access by the KCFD, the California Highway Patrol (CHP), and KCSO; 2) Install remote fire or heat sensors at sufficient locations to cover the entire facility (e.g., thermal infrared); 3) Provide fire water flow of at least 1,500 gallons per minute; 4) Install closed-circuit television (CCTV) cameras with Pan, Tilt, Zoom (PTZ), and low-light capability that cover the entire area of the facility and which would have their own separate power supply; 5) Establish a Command and Control protocol for staff to perform emergency duties and responsibilities during the detection, initiation, and escalation of an on-site ground level or underground level fire or rescue operation; 6) Ensure that three certified professionals, one to conduct underground gas testing, one to serve as a safety inspector, and one Certified Industrial Hygienist (CIH) to conduct air sampling and analysis, are present onsite every day and visit the cavern at intervals as dictated by a plan reviewed and approved by the CPM; 6) Ensure that three certified professionals, one to conduct underground gas testing, one to serve as a safety inspector, and one Certified Industrial Hygienist (CIH) to conduct air sampling and analysis, are present onsite every day and visit the cavern at intervals as dictated by a plan reviewed and approved by the CPM.	The project owner shall provide all the information required above to the KCFD for review and comment, to the CPM for review and approval, and to the DCBO for plan check approval and construction inspection. The project owner shall also schedule, after consultation and agreement of all parties involved, the pre-cavern construction and excavation conference at least 60 days prior to the start of cavern excavation and shall give the CPM at least 30 days written notice of the meeting. The project owner shall also provide a letter that the KCFD, CHP, and KCSO have been given access to the Knox boxes.	At least 60 days prior to the starting of cavern construction	WSP	10/2/28		

ATTACHMENT C

WRESC Air Quality Construction Mitigation Manager Monthly Report

Technical Memo

To: Noah Eckert (Hydrostor)

From: Alexa Beauchamp

CC: Jeremy Paris, David Stein (WSP)

Project title Willow Rock Energy Storage Center (WRESC)

Client: Hydrostor

Project number: US0029687.8172

Subject: AQCMM Monthly Compliance Report – August 2026

Date: 09-08-2026

During August 2026, air quality compliance monitoring was conducted at the WRESC site in accordance with the Air Quality Construction Mitigation Plan. Monitoring activities included verification of fugitive dust control measures, including watering of active work areas and roadways as required, and review of onsite construction equipment to confirm compliance with applicable diesel emissions, equipment tagging, and idling requirements.

Based on site observations and compliance monitoring conducted during the reporting period, air quality control measures were effectively implemented and maintained. No air quality complaints, deviations from the Air Quality Construction Mitigation Plan, or other air quality compliance issues were identified during the reporting period.

AQ-SC3

During the reporting period, construction activities were conducted in compliance with AQ-SC3 fugitive dust control requirements. Dust suppression measures, monitoring activities, and required controls were implemented as specified in the Air Quality Construction Mitigation Plan. No unapproved deviations from AQ-SC3 requirements occurred during the reporting period.

AQ-SC3 Measure	Compliance Status	Compliance Actions / Comments
Part 1 - Active area watering	☒Compliant ☐ N/A ☐ Corrective Action Required	Confirmed by AQCMM
Part 2 - Onsite speed limits/signage	☐Compliant ☒ N/A ☐ Corrective Action Required	No onsite roads have been established

AQ-SC3 Measure	Compliance Status	Compliance Actions / Comments
Part 3 - Offsite access road speed limits/signage	☐Compliant ☒ N/A ☐ Corrective Action Required	
Part 4 - Road dust suppression	☒Compliant ☐ N/A ☐ Corrective Action Required	Confirmed by AQCMM
Part 5 - Minimize disturbed areas	☒Compliant ☐ N/A ☐ Corrective Action Required	Confirmed by AQCMM
Part 6 - High wind dust controls	☒Compliant ☐ N/A ☐ Corrective Action Required	Confirmed by AQCMM
Part 7 - Inactive area stabilization	☐Compliant ☒ N/A ☐ Corrective Action Required	No inactive exposed areas
Part 8 - Disturbed area stabilization	☐Compliant ☒ N/A ☐ Corrective Action Required	No disturbed areas requiring stabilization – watered localized holes dug for WJT relocation
Part 9 - Restricted vehicle access	☐Compliant ☒ N/A ☐ Corrective Action Required	No disturbed areas
Part 10 - Permanent dust controls	☐Compliant ☒ N/A ☐ Corrective Action Required	No permanent dust controls required
Part 11 - Stockpile stabilization	☐Compliant ☒ N/A ☐ Corrective Action Required	No material stockpiled
Part 12 - Covered haul trucks/freeboard	☐Compliant ☒ N/A ☐ Corrective Action Required	No material hauled
Part 13 - Track-out controls	☐Compliant ☒ N/A ☐ Corrective Action Required	Track out controls will be installed as part of mobilization for Early Works
Part 14 - Equipment/truck cleaning	☐Compliant ☒ N/A ☐ Corrective Action Required	No haul trucks in use.
Part 15 - Roadway cleaning	☐Compliant ☒ N/A ☐ Corrective Action Required	No paved surfaces adjoining the site.
Part 16 - Portable equipment permits	☐Compliant ☒ N/A ☐ Corrective Action Required	No applicable PERP equipment on site during the period.
Part 17 - Notification signage	☒Compliant ☐ N/A ☐ Corrective Action Required	Confirmed by AQCMM

AQ-SC3 Measure	Compliance Status	Compliance Actions / Comments
Part 18 - Air quality complaints	☐Compliant ☒ N/A ☐ Corrective Action Required	No complaints received
Part 19 - Stabilized access roads	☐Compliant ☒ N/A ☐ Corrective Action Required	No site access roads installed in August
Part 20 - Runoff controls	☐Compliant ☒ N/A ☐ Corrective Action Required	No active construction area adjacent to paved roadways.
Part 21 - Public roadway sweeping	☐Compliant ☒ N/A ☐ Corrective Action Required	No paved public roadway within 500 feet of construction site access at this point

AQ-SC-4

No dust plumes concerns were noted during the month. No additional mitigation measures were necessary besides prescribed watering for dust suppression.

AQ-SC5

All diesel-fired construction equipment mobilized to the site were confirmed to be Tier 4 compliant, tagged and appropriately maintained. A letter from equipment owners listing onsite equipment and certifying that equipment was properly maintained is included. Please note that the J&M Land Restoration's equipment list letter is dated July; however, the equipment list remained unchanged and is also applicable to activities conducted in August. No additional actions were necessary to control diesel emissions.

Attachments

Record Keeping Form

Month: August

FORM D: Water Application onto Unpaved Roads & Equipment Areas

Project Location: WRESC Size: Miles or Acres (circle one)

Owner: Hydrostor Address City: Zip

Contact Person: Alexa Beauchamp Title: AQCMM Phone: (832-387-4302

Use this form to document daily water applications at the same or different areas. Use additional forms, as necessary.

Date	Time	Area Treated	Distance, Area, or Gallons Applied
8/3/26		dust control tree watering	**36,400 gal**
8/4/26		dust control tree watering	**40,000 gal**
8/5/26		dust control tree watering	**42,000 gal**
8/6/26		dust control tree watering	**42,000 gal**
8/7/26		dust control tree watering	**40,400 gal**
8/10/26		dust control tree watering	**32,800 gal**
8/11/26		dust control tree watering	**36,400 gal**
8/12/26		dust control	**32,400 gal**
8/13/26		dust control	**32,400 gal**
8/14/26		dust control	**28,800 gal**
8/17/26		dust control tree watering	**45,200 gal**

Comments:

Record Keeping Form

Month: August

FORM D: Water Application onto Unpaved Roads & Equipment Areas

Project Location: WRESC Size: Miles or Acres (circle one)

Owner: Hydrostor Address City: Zip

Contact Person: Alexa Beauchamp Title: AQCMM Phone: (832-387-4302

Use this form to document daily water applications at the same or different areas. Use additional forms, as necessary.

Date	Time	Area Treated	Distance, Area, or Gallons Applied
8/18/26		dust control tree watering	**47,200 gal**
8/19/26		dust control	**28,800 gal**
8/20/26		dust control	**57,600 gal**
8/21/26		dust control	**76,800 gal**
8/24/26		dust control tree watering	**153,600 gal**
8/25/26		dust control	**147,600 gal**
8/26/26		dust control	**180,000 gal**
8/27/26		dust control	**151,200 gal**
8/28/26		dust control	**126,000 gal**
8/31/26		dust control tree watering	**139,200 gal**

Comments:

Bakersfield Area Office
3005 James Road
Bakersfield, CA 93308

Phone: 661.399.3361
Estimating Fax: 661.399.3598
Main Fax: 661.399.0828

www.graniteconstruction.com

September 1, 2026
WSP
71 Stevenson Street
San Francisco, CA 94105

ATTN: David A. Stein, Senior Vice President Earth & Environment

RE: Willow Rock Hydrostor, H377059, GC Job 1910844
Monthly Compliance Report #6: Equipment On-Site

Granite mobilized the following heavy construction equipment to the Willow Rock Energy Storage Center Site in August 2026. The list below includes only construction equipment exceeding 50 hp.

Equipment Description	Greater than 50hp	Fuel
Cat 140M3	Yes	Diesel
Freightliner 4K Water Truck	Yes	Diesel
Peterbilt 4K Water Truck	Yes	Diesel
Cat 623K Scraper	Yes	Diesel
Cat 275 Skid Steer	Yes	Diesel
Cat 335FLCR	Yes	Diesel
Peterbilt 4K 6x6 WT	Yes	Diesel
Cat 275 Skid Steer	Yes	Diesel
Cat D8 Crawler Dozer	Yes	Diesel
JD 12k Reachlift	Yes	Diesel
Cat 299D3 Skid Steer	Yes	Diesel
Grademaster 18' Drag Scraper	Yes	Diesel
Kenworth 4K 6x6 WT	Yes	Diesel
Freightliner 4K 6x6 WT	Yes	Diesel
Cat 14M3 Motor Grater	Yes	Diesel
Kello-bilt Lx5812 Disc	Yes	Diesel
HiPower 50 KW Generator	Yes	Diesel

Granite hereby certifies that all of the above equipment was properly maintained while onsite.

All Correspondence for this project should be sent to Granite Construction Company, P.O. Box 5127 Bakersfield, CA 93308. Please do not hesitate to contact us if you have any questions or require additional information.

Sincerely,
GRANITE CONSTRUCTION COMPANY

Jeff Cox
Project Manager

GRANITE

Granite Construction Company Equipment Mobilization Checklist

GENERAL INFORMATION

Inspection Date:

Location: Dawn Rd. & Sierra Hwy.

Job: 1910844 Willow Rock Hydrostor Energy Storage

Recorded By: Robert Smith

Provider Company:	Equipment Number:	In:	Out:	Make:	Model:
Granite	12.39942	08/03		Cat	140M3
Equipment Share	04.75092	08/03		Freightliner	4k Water Truck

Notes:

VEHICLE & HEAVY EQUIPMENT

		Notes:
Is equipment in good operation condition?	☑ Y ☐ N ☐ N/A	
Have daily equipment inspection reports been completed?	☑ Y ☐ N ☐ N/A	
Is equipment fire extinguisher available?	☑ Y ☐ N ☐ N/A	
Is equipment clean and free of excess dirt and debris?	☑ Y ☐ N ☐ N/A	
Is equipment free of fluid leaks?	☑ Y ☐ N ☐ N/A	
Is secondary containment required and being utilized?	☑ Y ☐ N ☐ N/A	Drip Pans under equipment overnight

GRANITE

Granite Construction Company Equipment Mobilization Checklist

GENERAL INFORMATION

Inspection Date:

Recorded By:

Location: Dawn Rd. & Sierra Hwy.

Job: 1910844 Willow Rock Hydrostor Energy Storage

Provider Company:	Equipment Number:	In:	Out:	Make:	Model:
Equipment Share	04.75258R	08/10		Peterbilt	4k Water Truck
Equipment Share	18.75310R	08/10		Cat	623K Scraper
Equipment Share	08.75350R	08/10		Cat	275 Skid Steer
Equipment Share	30.66824R	08/10		Cat	335FLCR
Equipment Share	04.75376R	08/10		Peterbilt	4k 6x6 Water Truck
Equipment Share	08.75350R	08/10		Cat	275 Track Skid Steer

Notes:

VEHICLE & HEAVY EQUIPMENT

		Notes:
Is equipment in good operation condition?	☑ Y ☐ N ☐ N/A	
Have daily equipment inspection reports been completed?	☑ Y ☐ N ☐ N/A	
Is equipment fire extinguisher available?	☑ Y ☐ N ☐ N/A	
Is equipment clean and free of excess dirt and debris?	☑ Y ☐ N ☐ N/A	
Is equipment free of fluid leaks?	☑ Y ☐ N ☐ N/A	
Is secondary containment required and being utilized?	☑ Y ☐ N ☐ N/A	

GRANITE

Granite Construction Company Equipment Mobilization Checklist

GENERAL INFORMATION

Inspection Date:

Recorded By:

Location: Dawn Rd. & Sierra Hwy.

Job: 1910844 Willow Rock Hydrostor Energy Storage

Provider Company:	Equipment Number:	In:	Out:	Make:	Model:
Granite	07.DZ2029	08/17		Cat	D8 Crawler Dozer
Equipment Share	08.75473R	08/19		John Deer	12k Reachlift
Equipment Share	08.75475R	08/19		Cat	299D3 Skid Steer
Granite	14.234	08/19		Grademaster	18' Drag Scraper
Equipment Share	04.75481R	08/19		Isco	6x6 4K Water Truck
Equipment Share	04.75482R	08/19		Freightliner	6x6 4K Water Truck
Granite	12.MG2017	08/20		Cat	14M3 Motor Grater

Notes: Granite - 14.AT0001 - 08/20 - Kello-bilt - Lx5812 Disc
*Ran out of spaces

VEHICLE & HEAVY EQUIPMENT

		Notes:
Is equipment in good operation condition?	☑ Y ☐ N ☐ N/A	
Have daily equipment inspection reports been completed?	☑ Y ☐ N ☐ N/A	
Is equipment fire extinguisher available?	☑ Y ☐ N ☐ N/A	
Is equipment clean and free of excess dirt and debris?	☑ Y ☐ N ☐ N/A	
Is equipment free of fluid leaks?	☑ Y ☐ N ☐ N/A	
Is secondary containment required and being utilized?	☑ Y ☐ N ☐ N/A	

GRANITE

Granite Construction Company Equipment Mobilization Checklist

GENERAL INFORMATION

Inspection Date:

Recorded By:

Location: Dawn Rd. & Sierra Hwy.

Job: 1910844 Willow Rock Hydrostor Energy Storage

Provider Company:	Equipment Number:	In:	Out:	Make:	Model:

Notes: No new equipment mobilized this week

VEHICLE & HEAVY EQUIPMENT

		Notes:
Is equipment in good operation condition?	☐ Y ☐ N ☒ N/A	
Have daily equipment inspection reports been completed?	☐ Y ☐ N ☒ N/A	
Is equipment fire extinguisher available?	☐ Y ☐ N ☒ N/A	
Is equipment clean and free of excess dirt and debris?	☐ Y ☐ N ☒ N/A	
Is equipment free of fluid leaks?	☐ Y ☐ N ☒ N/A	
Is secondary containment required and being utilized?	☐ Y ☐ N ☒ N/A	

August 5, 2026

RE: Willow Rock Energy Storage Center

To Whom It May concern:

J&M Land Restoration Inc. Mobilized the following heavy construction equipment to the Willow Rock Energy Storage Center Site in July 2026:

2026 Kubota Skidsteer SVL97-3HFC	Diesel 96.4 HP
2022 Kubota Skidsteer SVL97-2HFC	Diesel 96.4 HP
2022 Kubota skidsteer SVL97-2HFC	Diesel 96.4 HP

J&M Land Restoration hereby certifies that all of the above equipment was properly maintained while onsite.

You may contact me at (661) 872-7039 Should you have any questions regarding this information.

Sincerely,

John Juette
Operations Manager

WILDLAND REVEGETATION SERVICES
1640 JAMES ROAD • BAKERSFIELD, CALIFORNIA 93308 • 661.872.7039 • 661.399.8882 FAX

ATTACHMENT D

WRESC DESIGINATED BIOLOGIST MONTHLY REPORT

Technical Memo

To:	Hydrostor Willow Rock Environmental Compliance Manager
From:	Kate Moss
CC:	Jeremy Paris, David Stein
Project title	Willow Rock Energy Storage Center
Client:	Hydrostor
Project number:	US0029687.5781
Subject:	Designated Biologist Monthly Compliance Report - August 2026
Date:	09-09-2026

1. Introduction

WSP USA Inc. (WSP) is conducting pre-construction biological surveys and providing biological monitoring services for the Willow Rock Energy Storage Center (WRESC; 21-AFC-02) in accordance with the applicable California Energy Commission (CEC) Conditions of Certification (CoCs).

The purpose of this technical memorandum is to summarize onsite activities conducted between August 1 and August 30, 2026, including construction activities, pre-construction biological surveys and clearance sweeps, biological monitoring activities, and non-compliance issues. This technical memorandum is intended to address monthly reporting requirements outlined in CoCs BIO-2, BIO-5, BIO-6, BIO-7, BIO-13, BIO-15, and BIO-16.

2. Summary of Construction Activities

Western Joshua tree (*Yucca brevifolia*) relocation, garbage removal, and desert tortoise fencing installation activities initiated in July continued into August. In addition, GEM initiated weed species removal and clearing and grubbing in the southern third of the WRESC site (Phase 1):

- Western Joshua tree relocation - August 3 to August 21. The remainder of the western Joshua trees anticipated to be relocated were removed during this period using a tree spade. Watering and mulching occurred at the relocation site
- Garbage clean-up – August 3
- Desert tortoise fence installation – August 3 to August 5
- Invasive species management – August 3 to August 12
- Clearing and grubbing – August 19 to August 31

3. Summary of Biological Surveys

Pre-construction biological surveys were conducted in accordance with the applicable CEC CoCs. These surveys were completed prior to project-related ground-disturbing activities to identify the presence or potential presence of sensitive biological resources in and adjacent to proposed work areas and to support the implementation of the applicable species-specific avoidance, minimization, and monitoring requirements. The following biological surveys and corresponding CoCs were conducted in August 2026:

- Desert Tortoise: BIO-16
- Nesting Birds: BIO-17
- Special-Status Reptiles: BIO-15

The results of biological surveys conducted to date are provided in a separate report and summarized in Table 3-1.

Table 3-1 Biological Survey Summary

Survey	Dates and Timing	Results
Desert Tortoise	Pre-clearance Desert tortoise sweeps were conducted no more than one week prior to the initiation of ground-disturbing activities and within 24 hours of the start of construction.	No desert tortoise, tortoise sign, or burrows observed.
	August 5, 10 to 12, 20, and 22-23, 2026	
	Sunrise to mid-afternoon	
Nesting Birds	Pre-construction nest sweeps were conducted within three days of the start of clearing or ground disturbance activities.	No active nests were identified.
	August 3, 10, 14, 17, 18, 20, and 22 to 27, 2026	
	Early to mid-morning	
Special-Status Reptiles	Surveys occurred prior to initiation of ground disturbance.	No special-status reptiles observed.
	August 3, 4, 22, and 23, 2026	
	N/A	

4. Summary of Biological Monitoring

Biological Monitors were present during western Joshua tree relocation and ground disturbance activities. Biological monitors conducted daily sweeps of areas prior to clearing and ground disturbance activities to document incidental observations of wildlife, including Crotch's bumble bee, reptiles, and small mammals as per CoCs. During sweeps, biological monitors checked cover boards for wildlife. Wildlife encountered were relocated (see Section 4.3). The Biological Monitors inspected machinery mobilized to the site for soil, mud, and invasive species, and monitored work activities. Daily information was collected using Survey123 and photographs. Table 4-1 provides a summary of monitoring activities as well as observations and compliance issues recorded.

Table 4-1 Summary of Biological Monitoring Activity

Date	Monitor	Construction Activities	Issues recorded
August 3, 2026	Tim Chumley	WJT relocation, weed management	Dead Mojave green rattlesnake observed (See Section 4.4)
	Glen Kinoshita		
	Michael Wilcox		
	Melanie Bukavoc		
August 4, 2026	Glen Kinoshita	weed management	None observed
	Melanie Bukavoc		
	Tim Chumley		
	Michael Wilcox		
August 5, 2026	Glen Kinoshita	WJT relocation, fence installation	Western whiptail mortality (See Section 4.4)
	Sarah Williams		
	Tim Chumley		
August 6, 2026	Glen Kinoshita	WJT relocation, weed management	None observed
	Sarah Williams		
	Tim Chumley		
August 7, 2026	Glen Kinoshita	WJT relocation, weed management	None observed
	Sarah Williams		
	Tim Chumley		
August 10, 2026	Emily Urquidi	WJT relocation, weed management	None observed
	Ryan Smith		
	Claire Bernd		
August 11, 2026	Ryan Smith	weed management	None observed
August 12, 2026	Ryan Smith	weed management	None observed
August 13, 2026	Ryan Smith	WJT relocation,	None observed
August 14, 2026	Ryan Smith	Mobilization of equipment	None observed
	Claire Bernd		

Date	Monitor	Construction Activities	Issues recorded
August 17, 2026	Glen Kinoshita Ryan Smith Claire Bernd Noor Zanaid	Parking lot grading and expansion, vegetation clearing, WJT watering	None observed
August 18, 2026	Glen Kinoshita Claire Bernd Noor Zanaid	Parking lot grading and expansion, vegetation clearing, WJT watering	None observed
August 19, 2026	Glen Kinoshita Noor Zanaid	Equipment mobilization, clearing and earthworks	None observed
August 20, 2026	Ryan Smith Claire Bernd	Clearing, grubbing, earthworks, WJT mulching	Gopher snake mortality (See Section 4.4)
August 21, 2026	Ryan Smith Glen Kinoshita	Clearing, grubbing, earthworks, WJT mulching	None observed
August 24, 2026	Ryan Smith Claire Bernd Hector Moreno	Clearing, grubbing, earthworks, silt fence installation	Three Kangaroo rat mortalities (See Section 4.4)
August 25, 2026	Ryan Smith Claire Bernd Hector Moreno	Clearing, grubbing, earthworks, silt fence installation	Kangaroo rat and leopard lizard mortality (See Section 4.4)
August 26, 2026	Ryan Smith Claire Bernd Hector Moreno	Clearing, grubbing, earthworks	None observed
August 27, 2026	Ryan Smith Claire Bernd	Clearing, grubbing, earthworks	Kangaroo rat mortality (See Section 4.4)
August 29, 2026	Claire Bernd	Clearing, grubbing, earthworks	None observed

4.1 Avoidance and Minimization Measures Implemented

Avoidance and minimization measures implemented during the reporting period included:

- Monitoring potentially active desert kit fox dens
- Excavation of six potential burrowing owl burrows

Two potentially active dens that could support a desert kit fox were recorded north of the Phase 1 clearing area (Figure 1). Remote sensing cameras were set at the two potentially active dens from August 16 to 21, 2026 to monitor den activity. A temporary 500-meter no-go buffer was flagged around the two potential dens while camera monitoring was undertaken. Clearing and grubbing activities were not conducted in this area until monitoring was complete. No desert kit fox, American badger, or ringtail were observed on the cameras during the monitoring period, and no wildlife were observed entering either den.

Six potential burrowing owl burrows located in the Phase 1 clearing and grubbing area (Figure 1) were monitored and excavated during the reporting period. The six potential burrowing owl burrows were verified as unoccupied using the methods described in Section 6.1 of the *Burrowing Owl Mortality Reduction Plan*. Once burrows were confirmed unoccupied, they were excavated following methods outlined in Section 6.3 of the *Burrowing Owl Mortality Reduction Plan.* The Designated Biologist (Jeremy Paris) was present during all excavations. No burrowing owl or other wildlife were observed during the monitoring or excavation of the burrows.

Table 4-1 Summary of Potential Burrowing Owl Burrow Excavations

Burrow ID	Date of inspection	Date of excavation
BUOW-2026-BRW-01-SW	August 13 and 17, 2026	August 17, 2026
BUOW-2026-BRW-07-CB	August 13 and 17, 2026	August 17, 2026
BUOW-2026-BRW-03-CB	August 13 and 17, 2026	August 17, 2026
BUOW-2026-BRW-33-CB	August 13 and 17, 2026	August 17, 2026
BUOW-2026-BRW-34-CB	August 18 and 19, 2026	August 19, 2026
BUOW-2026-BRW-35-CB	August 19, 2026	August 19, 2026

4.2 Incidental Wildlife Observations

Biological monitors incidentally observed 17 wildlife species between August 1 and 31, including five reptile, six bird, and six mammal species (Table 4-2).

Table 4-2 Summary of Incidental Wildlife Observations

Common name	Scientific name	Status
Long-nosed leopard lizard	*Gambelia wislizenii*	NA
Side-blotched lizard	*Uta stansburiana*	NA
Great Basin whiptail	*Aspidoscelis tigris tigris*	NA
Desert spiny lizard	*Sceloporus magister*	NA
Mohave green rattlesnake	*Crotalus scutulatus*	NA
Common kingsnake	*Lampropeltis californiae*	NA
Coachwhip snake	*Masticophis piceus*	NA
Bell's sparrow	*Artemisiospiza belli*	NA
Brown headed cowbird	*Molothrus ater*	Invasive species/ management concern
Cactus wren	*Campylorhynchus brunneicapillus*	NA
California quail	*Callipepla californica*	NA
Common Raven	*Corvus corax*	NA
Northern mockingbird	*Mimus polyglottos*	NA
LeConte's thrasher	*Toxostoma lecontei*	Candidate species
Merriam's kangaroo rat	*Dipodomys merriami*	NA
Grasshopper mouse sp	*Onychomys sp*	NA
California ground squirrel	*Otospermophilus beecheyi*	NA
Desert cottontail	*Sylvilagus audubonii*	NA
Black-tailed jackrabbit	*Lepus californicus*	NA
White-tailed antelope squirrel	*Ammospermophilus leucurus*	NA

4.3 Wildlife Relocation

A total of 286 animals were relocated from the Phase 1 clearing and grubbing area comprised of seven small mammal species and three snake species. Animals incidentally encountered by Biological Monitors were relocated when they could be safely caught. In addition, small mammals were trapped over 8 nights. Traps were only set at night, when small mammals are most active, to avoid high daytime temperatures. Trapping, handling, and relocation were undertaken following methods outlined in the *Wildlife Protection and Relocation Plan*. Table 4-3a summarizes salvaged wildlife, which are listed in detail in Table 4.3b.

Table 4-3a Summary of Salvaged Wildlife

Common name	Scientific name	Number relocated
Merriam's kangaroo rat	*Dipodomys merriami*	77
Panamint Kangaroo Rat	*Dipodomys panamintinus*	123
Kangaroo rat	*Dipodomys sp*	56
Cactus mouse	*Peromyscus eremicus*	12
Desert wood rat	*Neotoma lepida*	3
Southern grasshopper mouse	*Onychomys torridus*	8
Little pocket mouse	*Perognathus longimembris*	2
Desert pocket mouse	*Chaetodipus penicillatus*	2
Great Basin whiptail	*Aspidoscelis tigris tigris*	1
Gartersnake sp	*Thamnophis sp.*	1
Mohave green rattlesnake	*Crotalus scutulatus*	1
Total		**286**

Table 4-3b Wildlife species relocated between July 22 to August 31

Common name	Scientific Name	Number Relocated	Date of Relocation	Capture Site	Relocation Site
Merriam's kangaroo rat	*Dipodomys merriami*	5	07-22-2026	Phase 1 Clearing area	Villa Haines
Panamint Kangaroo Rat	*Dipodomys panamintinus*	10	07-22-2026	Phase 1 Clearing area	Villa Haines
Cactus mouse	*Peromyscus eremicus*	3	07-22-2026	Phase 1 Clearing area	Villa Haines
Desert wood rat	*Neotoma lepida*	1	07-22-2026	Phase 1 Clearing area	Villa Haines
Southern grasshopper mouse	*Onychomys torridus*	2	07-22-2026	Phase 1 Clearing area	Villa Haines
Merriam's kangaroo rat	*Dipodomys merriami*	2	07-23-2026	Phase 1 Clearing area	Villa Haines
Panamint Kangaroo Rat	*Dipodomys panamintinus*	4	07-23-2026	Phase 1 Clearing area	Villa Haines
Cactus mouse	*Peromyscus eremicus*	2	07-23-2026	Phase 1 Clearing area	Villa Haines
Little pocket mouse	*Perognathus longimembris*	1	07-23-2026	Phase 1 Clearing area	Villa Haines
Kangaroo Rat	*Dipodomys sp*	55	08-15-2026	Phase 1 Clearing area	Villa Haines
Cactus mouse	*Peromyscus eremicus*	3	08-15-2026	Phase 1 Clearing area	Villa Haines
Desert wood rat	*Neotoma lepida*	1	08-15-2026	Phase 1 Clearing area	Villa Haines

Common name	Scientific Name	Number Relocated	Date of Relocation	Capture Site	Relocation Site
Southern grasshopper mouse	*Onychomys torridus*	1	08-15-2026	Phase 1 Clearing area	Villa Haines
Merriam's kangaroo rat	*Dipodomys merriami*	13	08-17-2026	Phase 1 Clearing area	10 released to P2 South 3 to Villa Haines
Panamint Kangaroo Rat	*Dipodomys panamintinus*	34	08-17-2026	Phase 1 Clearing area	8 released to P2 South 26 to Villa Haines
Kangaroo Rat	*Dipodomys sp*	1	08-17-2026	Phase 1 Clearing area	Villa Haines
Cactus mouse	*Peromyscus eremicus*	1	08-17-2026	Phase 1 Clearing area	Villa Haines
Desert wood rat	*Neotoma lepida*	1	08-17-2026	Phase 1 Clearing area	Villa Haines
Southern grasshopper mouse	*Onychomys torridus*	2	08-17-2026	Phase 1 Clearing area	Villa Haines
Desert pocket mouse	*Chaetodipus penicillatus*	1	08-17-2026	Phase 1 Clearing area	Villa Haines
Merriam's kangaroo rat	*Dipodomys merriami*	1	08-18-2026	Phase 1 Clearing area	P2 South
Great Basin whiptail	*Aspidoscelis tigris tigris*	1	08-18-2026	Phase 1 Clearing area	P2 South
Merriam's kangaroo rat	*Dipodomys merriami*	14	08-18-2026	Phase 1 Clearing area	Villa Haines

Common name	Scientific Name	Number Relocated	Date of Relocation	Capture Site	Relocation Site
Panamint Kangaroo Rat	*Dipodomys panamintinus*	30	08-18-2026	Phase 1 Clearing area	Villa Haines
Southern grasshopper mouse	*Onychomys torridus*	2	08-18-2026	Phase 1 Clearing area	Villa Haines
Desert pocket mouse	*Chaetodipus penicillatus*	1	08-18-2026	Phase 1 Clearing area	Villa Haines
Merriam's kangaroo rat	*Dipodomys merriami*	2	08-19-2026	Phase 1 Clearing area	P2 South
Gartersnake sp	*Thamnophis sp.*	1	08-19-2026	Phase 1 Clearing area	P2 South
Merriam's kangaroo rat	*Dipodomys merriami*	2	08-20-2026	Phase 1 Clearing area	P2 South
Merriam's kangaroo rat	*Dipodomys merriami*	10	08-24-2026	Phase 1 Clearing area	P2 South
Mohave green rattlesnake	*Crotalus scutulatus*	1	08-24-2026	Phase 1 Clearing area	P2 South
Merriam's kangaroo rat	*Dipodomys merriami*	4	08-24-2026	Phase 1 Clearing area	P2 South
Panamint Kangaroo Rat	*Dipodomys panamintinus*	13	08-24-2026	Phase 1 Clearing area	P2 South
Cactus mouse	*Peromyscus eremicus*	1	08-24-2026	Phase 1 Clearing area	P2 South
Merriam's kangaroo rat	*Dipodomys merriami*	13	08-25-2026	Phase 1 Clearing area	P2 South
Panamint Kangaroo Rat	*Dipodomys panamintinus*	19	08-25-2026	Phase 1 Clearing area	P2 South

Common name	Scientific Name	Number Relocated	Date of Relocation	Capture Site	Relocation Site
Cactus mouse	*Peromyscus eremicus*	2	08-25-2026	Phase 1 Clearing area	P2 South
Little pocket mouse	*Perognathus longimembris*	1	08-25-2026	Phase 1 Clearing area	P2 South
Merriam's kangaroo rat	*Dipodomys merriami*	10	08-26-2026	Phase 1 Clearing area	P2 South
Panamint Kangaroo Rat	*Dipodomys panamintinus*	13	08-26-2026	Phase 1 Clearing area	P2 South
Southern grasshopper mouse	*Onychomys torridus*	1	08-26-2026	Phase 1 Clearing area	P2 South
Merriam's kangaroo rat	*Dipodomys merriami*	1	08-27-2026	Phase 1 Clearing area	P2 South

4.4 Wildlife Mortality

Eleven wildlife mortalities were recorded during the reporting period. No mortalities of special status species were recorded. Wildlife mortalities are summarized in Table 4-4.

Table 4-4 Summary of Wildlife Mortalities

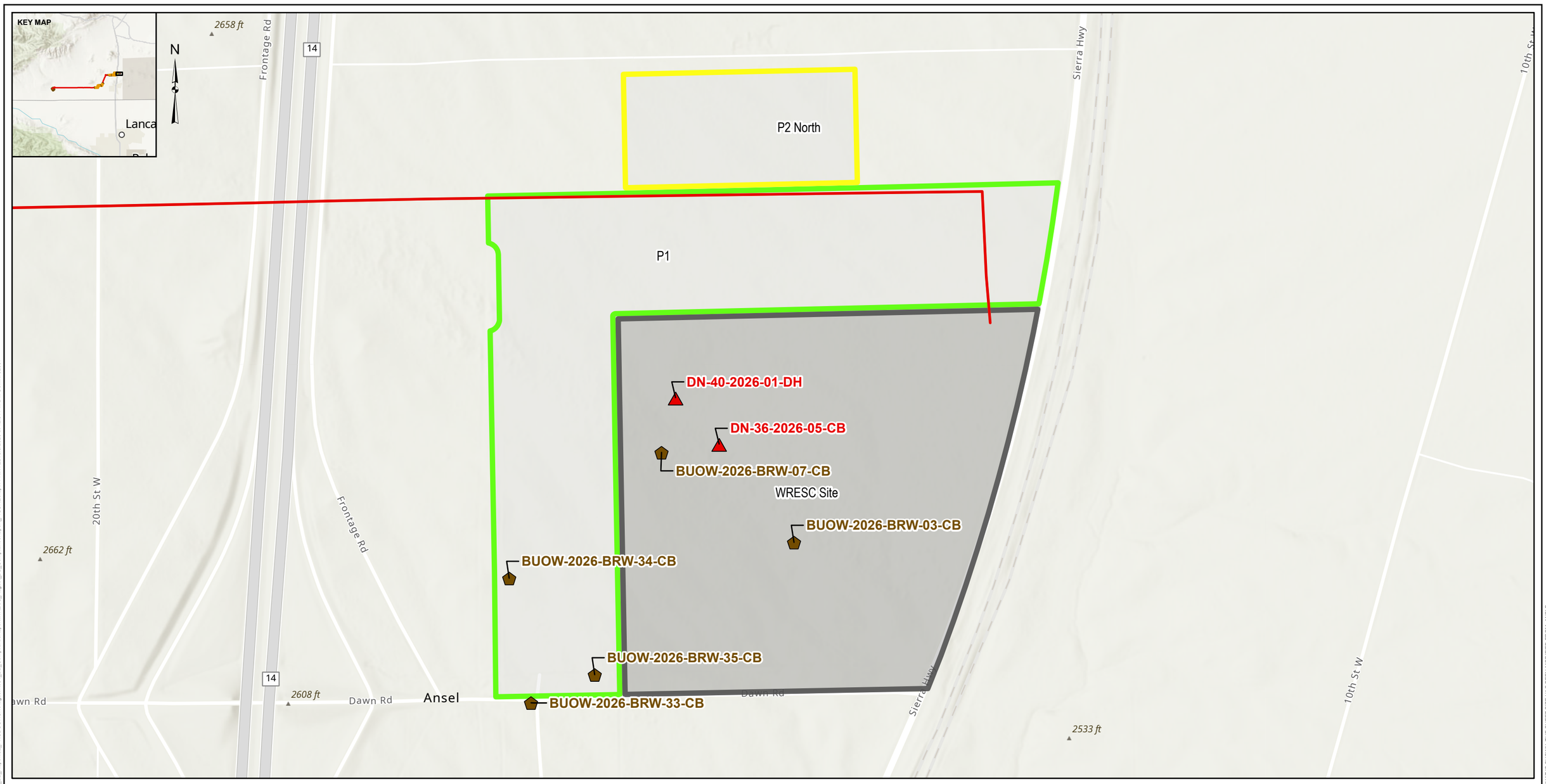
Common name	Scientific name	Number of Mortalities	Date Observed	Notes
Mohave green rattlesnake	*Crotalus scutulatus*	1	August 3, 2026	Found dead during western Joshua tree relocation. Mechanism of death not observed.
Great basin whiptail	*Aspidoscelis tigris tigris*	1	August 5, 2026	Presumed collision with water truck.

Common name	Scientific name	Number of Mortalities	Date Observed	Notes
Gopher snake	*Pituophis catenifer*	1	August 8, 2026	Collision with grader.
Long-nosed leopard lizard	*Gambelia wislizenii*	1	August 26, 2026	NA
Kangaroo rats	*Dipodomys merriami*	3	August 24, 2026	Collision with bulldozer.
		1	August 26, 2026	NA
		1	August 27, 2026	Collision with bulldozer.
		1	August 28, 2026	NA
Desert wood rat	*Neotoma lepida*	1	August 28, 2026	NA

5. Compliance

No compliance issues were recorded between August 1 and 31, 2026.

Figure



LEGEND

- POTENTIALLY ACTIVE KIT FOX DENS
- BURROWING OWL BURROWS
- GEN-TIE TRANSMISSION LINE

PROJECT BOUNDARY

PERMANENT DISTURBANCE

- WRESC SITE

TEMPORARY DISTURBANCE

- P1 - TEMPORARY CONSTRUCTION LAYDOWN
- P2 NORTH - TEMPORARY CONSTRUCTION LAYDOWN

0 1,000

1:6,000 Feet

REFERENCE(S)

1. COORDINATE SYSTEM: NAD 1983 STATEPLANE CALIFORNIA V FIPS 0405 FEET
2. MAP SERVICE LAYER CREDITS: WORLD TOPOGRAPHIC MAP: SOURCES: ESRI, TOMTOM, GARMIN, FAO, NOAA, USGS, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY
WORLD HILLSHADE: ESRI, NASA, NGA, USGS, FEMA
WORLD HILLSHADE: ESRI, USGS

CLIENT
GEM A-CAES LLC

CONSULTANT
wsp

YYYY-MM-DD	2026-09-08
DESIGNED	MK
PREPARED	MK
REVIEWED	KM
APPROVED	JP

PROJECT
WILLOW ROCK ENERGY STORAGE CENTER

TITLE
AUGUST 1 TO 31 DB COMPLIANCE REPORT

PROJECT NO.	REV.	FIGURE
US0029687.5781	0	1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI B

PATH: G:\Hydrostor\Ansel\09_PROJECT\SUS0029687.5781_Hydrostor\ConstructionPlans\08_DB_Report\02_PRODUCTION\August1to31_DB_ComplianceReport\WRESC_August_DB_ComplianceReport_FIGURES.aprx PRINTED: 9/8/2026 at 12:51 PM BY: USMK702001

ATTACHMENT E

WRESC WORKER ENVIRONMENTAL AWARENESS TRAINING CERTIFICATION FORMS

WEAP Training Acknowledgement Form

Willow Rock Energy Storage Centre Project, Kern County, California Workers Environmental Awareness Program (Biological, Paleontological and Cultural and Tribal Cultural Resources) Verification - All On-Site Employees.

This is to certify the below-mentioned individuals have completed a mandatory California Energy Commission-approved Workers Environmental Awareness Program for Employees on site at the Willow Rock Energy Storage Centre Project. By signing below, the participants indicate that they understand and shall abide by the guidelines set forth in the Program materials. A helmet sticker will be provided to employees who have completed the WEAP training.

No ground disturbance shall occur prior to implementation of the WEAP program unless such activities are specifically approved by the CPM.

WEAP Completion Date	Employee Name	Company
9/9/26, 10:09 AM	Matthew Fagan	NV5
9/9/26, 10:05 AM	Ross Morrison	NV5
9/9/26, 10:05 AM	Jim Sanders	NV5
9/9/26, 10:05 AM	Lori Goodwin	NV5, Inc.
9/9/26, 10:05 AM	Bobby Pentorali	NV5
9/8/26, 11:39 AM	Travis Don Parmelee	Granite
9/8/26, 11:33 AM	Sergio j Gonzalez	Granite
9/8/26, 11:33 AM	Robert Mavis	Sequoia
9/8/26, 11:33 AM	Joel Santoyo	Granite
9/8/26, 11:33 AM	Eugenio vega	Hatch
9/8/26, 11:33 AM	Andrew Sheble	WSP
9/8/26, 11:33 AM	William Duford	Granite construction
9/8/26, 11:33 AM	Cheyenne Rivera	Tejon Indian Tribe

WEAP Completion Date	Employee Name	Company
9/8/26, 11:33 AM	Patrick Nolet	Hatch
9/8/26, 11:33 AM	Shawn Henderson	Hydrostor
9/8/26, 11:33 AM	Larry Bullard	Granite
9/8/26, 11:33 AM	Norberto Ramirez	Hydrostor
9/8/26, 11:33 AM	Leonel Pelayo	Other
9/1/26, 8:25 PM	Erik Landis	WSP
9/1/26, 8:13 PM	Jessica Ramirez	WSP
9/1/26, 8:30 AM	Joe Chesno	Hatch
8/24/26, 8:38 AM	Darryl Ebel	Granite Construction
8/24/26, 8:38 AM	Barbara Minor	Hydrostor
8/24/26, 8:38 AM	Owen Morse	Quinn company
8/24/26, 8:38 AM	Quellen Andrews	Granite Construction Company
8/24/26, 8:38 AM	Todd Hopkins	Quinn Cat Rentals
8/17/26, 8:31 AM	Thomas D James	Hydrostor
8/17/26, 8:30 AM	Isaac Perez	Granite construction
8/17/26, 8:30 AM	Cody Doolittle	Hydrostor
8/17/26, 8:30 AM	Timothy Hernandez	Hydrostor
8/17/26, 8:30 AM	Johnny Raymond howard	Hydrostor
8/17/26, 8:30 AM	Daniel Shafer	Granite construction
8/17/26, 8:30 AM	Eric Martinez	Hydrostor
8/17/26, 8:30 AM	guillermo peña moreno	Hydrostor
8/17/26, 8:30 AM	Dave Vradenburg	Hydrostor
8/17/26, 8:30 AM	Jerome Hessler	Other
8/13/26, 1:07 PM	Steven wyatt	Granite
8/13/26, 1:07 PM	Darin Thompson	Granite
8/12/26, 11:48 AM	Lydia DeAngelis	Hydrostor
08/02/2026	Nicholas Bizzell	WSP

A total of 40 personnel were trained under the WEAP program during the period from August 1st through September 9, 2026.

Trainers:

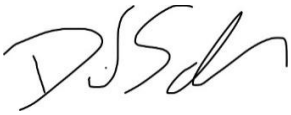
WEAP Trainer – Biological Resources: Jeremy Paris


, 9/9/2026

WEAP Trainer – Biological Resources: Kate Moss


, 9/9/2026

WEAP Trainer – Paleontological Resources: David Schroeder


, 9/9/2026

WEAP Trainer – Cultural Resources: Ryan Arp


, 9/9/2026

ATTACHMENT F

WRESC PRS MONITORING SUMMARY AND DAILY MONITORING LOGS

Technical Memo

To:	Noah Eckert (Hydrostor) and Dan Gonzalez (Hatch)
From:	David Schroeder, Paleontological Resources Specialist
CC:	Josh Rowan, Simon Contreras, Eddie Figueroa, Lydia DeAngelis (Hydrostor); Kevin Boudreau (Hatch); Susan Strachen (Strachen Consulting); David Stein (WSP); Jeff Cox, Clyde Burget (Granite)
Project title	Willow Rock Energy Storage Center (WRESC)
Client:	Hydrostor
Project number:	US0029687.8172
Subject:	Paleontological Monthly Compliance Report – August 2026 Construction Monitoring
Date:	09-08-2026

WSP USA Inc. (WSP) conducted paleontological monitoring for the WRESC Project (Project; Figure 1) in Kern County, California, between August 3 and August 31, 2026. Paleontological monitoring was performed in compliance with the Project's approved Paleontological Resources Monitoring and Mitigation Plan (PRMMP). Monitoring efforts consisted of Western Joshua Tree (WJT) relocation, V-ditch excavation, and grading. All monitoring was conducted by Dozie Itie, a California Energy Commission (CEC)-approved Paleontological Resources Monitor (PRM).

A total of 121 WJT holes were excavated and monitored between August 3 and August 21, 2026 (Table 1; Figure 2). Excavation associated with WJT relocation generally averaged approximately 2 to 3 feet (ft) in diameter and between 3.5 ft to 4.5 ft in depth. Project-related activities occurred in areas mapped as Quaternary windblown sand (Qs) and Quartz Monzonite (qm), both of which have a Potential Fossil Yield Classification (PFYC) of 2 or less but require monitoring when ground disturbance exceeds two ft in depth. No paleontological resources were observed during these activities.

WJT relocation activities occurred on August 3, 2026, and continued through August 21, 2026, using a tree spade, skid steer, and water truck. Numerous excavations associated with tree removal and relocation were monitored, with most excavations ranging from approximately 2 to 3 ft in width and 3 to 4.5 ft in depth. Sediments exposed during monitoring were consistently described as light brown to light brown-orange sandy deposits, with little variation across the Project area. Surface horizons exhibited disturbance from modern debris, while deeper sediments generally remained intact. On August 4, August 6, and August 11, 2026, minor caliche development was observed at the bottoms of some excavations; however, its occurrence was limited and did not represent a substantial lithologic change.

Between August 24 and August 26, 2026, no ground-disturbing activities exceeding 2 ft in depth occurred in the Project area because scheduled ground disturbance below 2 ft in depth did not occur. The monitor was on standby during these days in anticipation of ground disturbance that required paleontological monitoring. Surficial geologic observations included light brown sandy sediments that appeared generally intact, with localized surface disturbance associated with modern debris.

On August 27 and August 28, 2026, the PRM monitored excavation of a V-ditch using a blade. Ground disturbance exceeded 2 ft and extended to approximately 5 ft in depth. Sediments consisted primarily of light brown sandy deposits that appeared generally intact below the surface, with localized disturbance associated with modern debris.

On August 31, 2026, the PRM monitored grading using a John Deere tractor, scraper, and dozer in the vicinity of the Granite trailers. Ground disturbance exceeded 2 ft in depth and exposed similar light brown sandy sediments. No paleontological resources were observed during these activities.

Copies of all Daily Monitoring Logs completed during August 2026 are included in Appendix A.

Table 1 Results of Paleontological Monitoring in August 2026

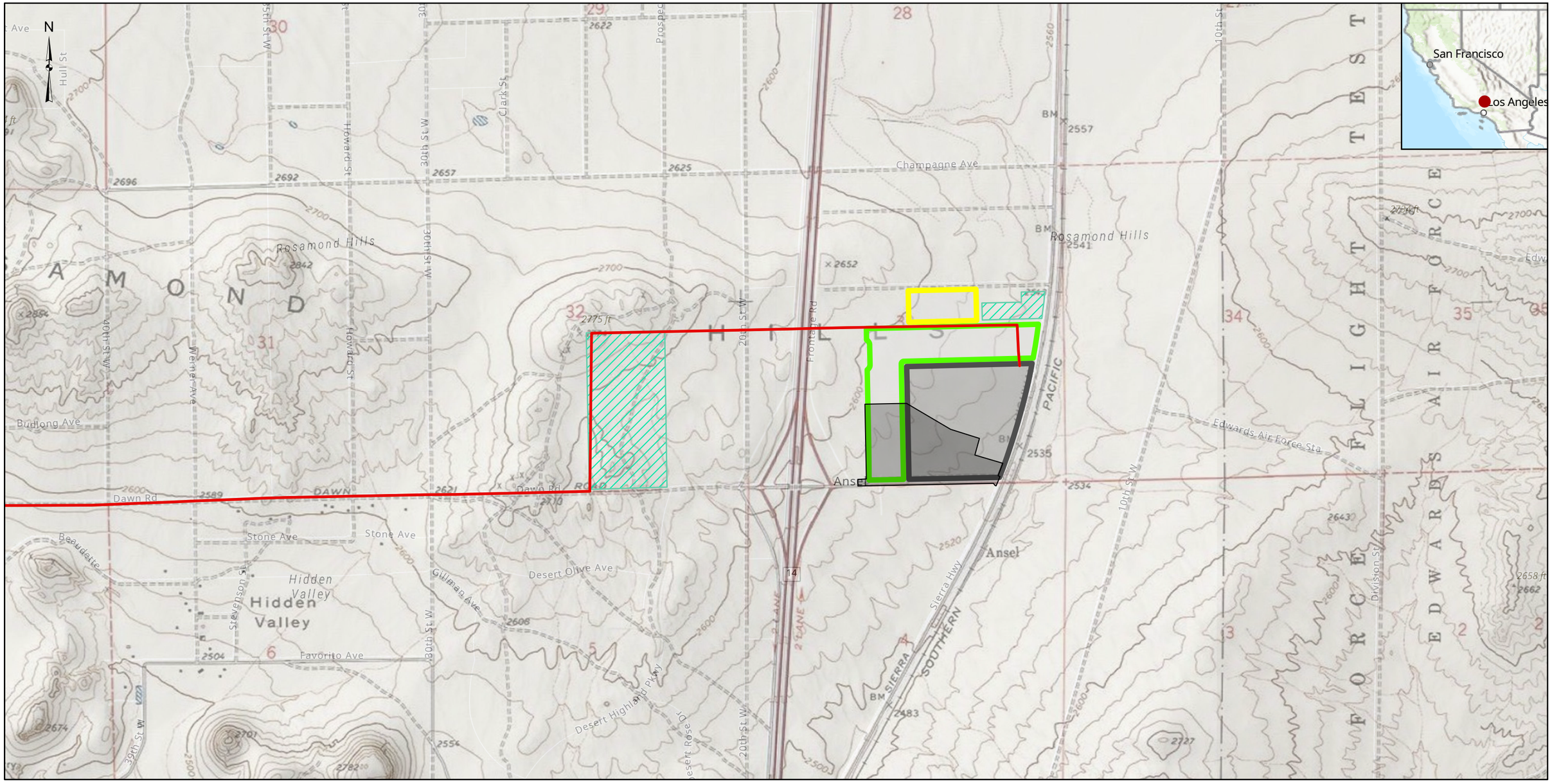
Date	Type of Ground-Disturbing Activity	Number of WJT Holes Monitored	Average Dimensions of Ground Disturbance	Geologic Unit / Geologic Description	Paleontological Resources Observed?
August 3, 2026	Western Joshua Tree relocation using tree spade, skid steer, and water truck.	18	Approximately 2 ft wide × 4.5 ft deep	Light brown sandy sediment; generally intact below surface with minor modern debris disturbance.	No
August 4, 2026	Western Joshua Tree relocation using tree spade, skid steer, and water truck.	18	Approximately 3 ft wide × 4 ft deep	Light brown sandy sediment; generally intact below surface with minor modern debris disturbance observed to approximately 3 ft; with highly indurated caliche sediments.	No
August 5, 2026	Western Joshua Tree relocation using tree spade, skid steer, and water truck.	15	Approximately 2 ft wide × 4.5 ft deep	Light brown sandy sediment; generally intact below surface with minor modern debris disturbance	No

Date	Type of Ground-Disturbing Activity	Number of WJT Holes Monitored	Average Dimensions of Ground Disturbance	Geologic Unit / Geologic Description	Paleontological Resources Observed?
August 6, 2026	Western Joshua Tree relocation using tree spade, skid steer, and water truck.	17	Approximately 2.7 ft wide × 3.5 ft deep	Light brown-yellowish sandy sediment; no observed sedimentary changes; surface disturbance from modern debris only; with highly indurated caliche sediments and reddish-brown sediments.	No
August 7, 2026	Western Joshua Tree relocation using tree spade, skid steer, and water truck.	15	Approximately 3 ft wide × 4.3 ft deep	Light brown-yellowish sandy sediment; no observed sedimentary changes; surface disturbance from modern debris only.	No
August 10, 2026	Western Joshua Tree relocation using tree spade, skid steer, and water truck.	18	Approximately 2.8 ft wide × 4.0 ft deep	Light brown-yellowish sandy sediment; no observed sedimentary changes; surface disturbance from modern debris only.	No
August 11, 2026	Western Joshua Tree relocation using tree spade, skid steer, and water truck.	18	Approximately 3 ft wide × 3.8 ft deep	Light brown, weakly indurated sandy sediment; minor caliche observed in some excavation bottoms; modern surface disturbance present.	No

Date	Type of Ground-Disturbing Activity	Number of WJT Holes Monitored	Average Dimensions of Ground Disturbance	Geologic Unit / Geologic Description	Paleontological Resources Observed?
August 13, 2026	Spot checking of tree spading near Sierra Highway	0	Approximately 3 ft deep	Light brown sandy sediment; generally intact below surface with minor modern debris disturbance. Modern animal remains identified as dog bones were observed during spot checking.	No
August 17, 2026	Monitoring canceled	0	N/A	N/A	No
August 20, 2026	Western Joshua Tree relocation using tree spade, skid steer, and water truck.	1	No excavation exceeding 2 ft	Light brown-yellowish sandy sediment; no observed sedimentary changes; surface disturbance from modern debris only.	No
August 21, 2026	Western Joshua Tree relocation using tree spade, skid steer, and water truck.	1	No excavation exceeding 2 ft	Light brown-yellowish sandy sediment; no observed sedimentary changes; surface disturbance from modern debris only.	No
August 24, 2026	Monitoring standby	0	No excavation exceeding 2 ft	N/A	No
August 25, 2026	Monitoring standby	0	No excavation exceeding 2 ft	N/A	No
August 26, 2026	Monitoring standby	0	No excavation exceeding 2 ft	N/A	No
August 27, 2026	V-Ditch excavated with blade.	0	Excavation exceeding 2 ft and extending to approximately 5 ft in depth.	Light brown sandy sediment; generally intact below surface with minor modern debris disturbance.	No
August 28, 2026	V-Ditch excavated with blade.	0	Excavation exceeding 2 ft and extending to approximately 5 ft in depth	Light brown sandy sediment; generally intact below surface with minor modern debris disturbance.	No

Date	Type of Ground-Disturbing Activity	Number of WJT Holes Monitored	Average Dimensions of Ground Disturbance	Geologic Unit / Geologic Description	Paleontological Resources Observed?
August 31, 2026	Grading with a John Deere tractor, scraper, and dozer behind the Granite Trailers.	0	Ground disturbance exceeding 2 ft in depth.	Light brown sandy sediment; generally intact below surface with minor modern debris disturbance.	No

Figures



LEGEND

Project Boundary

- WRESC Site
- P1
- P2 North
- Gen-Tie Line Alignment
- Phase 1 Limits of Disturbance
- Western Joshua Tree Relocation Sites

0 2,000

1:24,000 Feet

CLIENT
GEM A-CAES LLC

CONSULTANT
wsp

YYYY-MM-DD	2026-08-10
DESIGNED	MK
PREPARED	KO
REVIEWED	DS
APPROVED	DS

NOTE(S)

REFERENCE(S)
1. COORDINATE SYSTEM: WGS 1984 WEB MERCATOR AUXILIARY SPHERE
2. MAP SERVICE LAYER CREDITS: USA_STATE_BOUNDARIES: SOURCES: ESRI, TOMTOM, U.S. DEPARTMENT OF COMMERCE, U.S. CENSUS BUREAU
WORLD TOPOGRAPHIC MAP: SOURCES: ESRI, TOMTOM, GARMIN, FAO, NOAA, USGS, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY
WORLD HILLSHADE: ESRI, NASA, NGA, USGS, FEMA
USGS TOPO MAPS (MAP SERVICE): ESRI

PROJECT
WILLOW ROCK ENERGY STORAGE CENTER

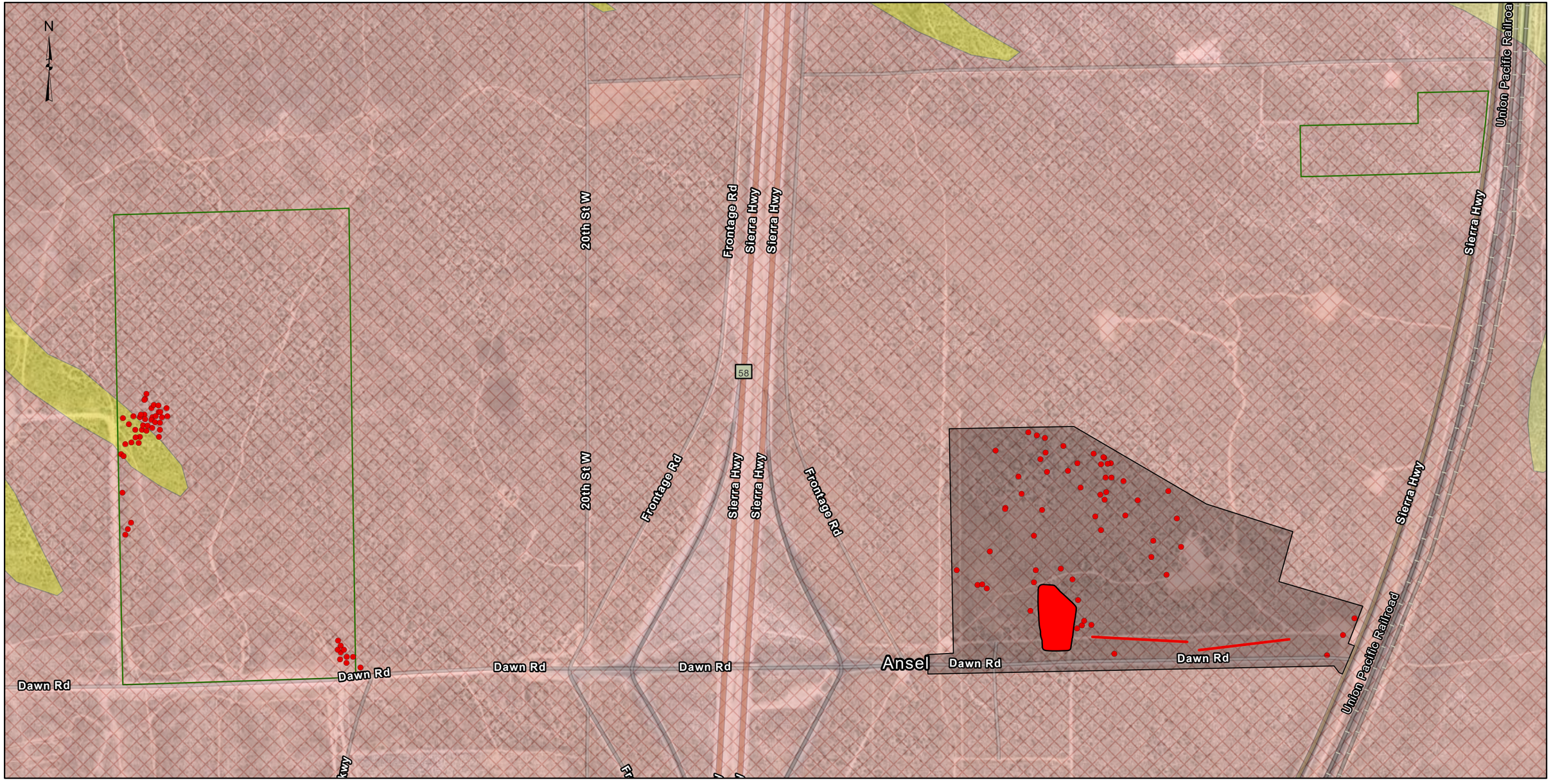
TITLE
FIGURE 1 - PROJECT OVERVIEW MAP

FIGURE
1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI B

0 1in

PATH: G:\Hydrotor\Ansel\11_GIS\TEMP\2026_07_30_PaleoFieldmapsSetup\WRESC_PaleoFieldmapsSetup\WRESC_PaleoFieldmapsSetup.aprx PRINTED: 8/10/2026 at 1:34 PM BY: USKO127009



LEGEND

- Project Boundary
- Phase 1 Limits of Disturbance
- Western Joshua Tree Relocation Sites
- Western Joshua Tree Relocation Holes
- Trenching
- Ripping/Grading

Geologic Units

- Qa - Alluvium
- Qs - Windblown sand
- qm - Quartz monzonite

0 1,000

1:8,000 Feet

CLIENT
GEM A-CAES LLC

CONSULTANT
wsp

YYYY-MM-DD	2026-09-03
DESIGNED	MK
PREPARED	KO
REVIEWED	DS
APPROVED	JP

NOTE(S)

REFERENCE(S)
1. COORDINATE SYSTEM: WGS 1984 WEB MERCATOR AUXILIARY SPHERE
2. MAP SERVICE LAYER CREDITS: WORLD IMAGERY: VANTOR
HYBRID REFERENCE LAYER: SOURCES: ESRI, TOMTOM, GARMIN, FAO, NOAA, USGS, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY

PROJECT
WILLOW ROCK ENERGY STORAGE CENTER

TITLE
FIGURE 2 - PALEONTOLOGICAL MONITORING MAP

FIGURE
2

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI B

PATH: Y:\GIS_share\Projects\2026_Projects\US0057278.5298_US_GEM_Western_Joshua_Tree_Relocation\APRX\US0057278.aprx PRINTED: 9/3/2026 at 11:26 AM BY: USAS211516

Appendix A Daily Monitoring Logs

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 3, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Equipment: Water Truck, Skeed Steer, and tree spade
Depth Width
1.2feet 11in. , 4feer 3inches
2.4feet 3in. , 2 feet 6inches
3.2ft 8inches, 4ft 3inches
4.2ft 7in., 4ft 11inches
5.3ft 4inches, 4ft
6.3ft 2inches, 3ft 11inches
7.2ft 9in, 4ft 3in
8.2 ft 8in, 4ft
9.3ft 1in, 3ft 9in.- Semi angular rock at the bottom
10.2ft 10 in., 4ft 1in.
11.3feet 3in, 4ft
12.3f5 2in, 4ft
13.3ft 2in, 4ft 4in
14.2ft 7in., 4ft 7ib
15.2ft 9in, 4ft
16.3feet 3in, 4ft 2in
17.2ft 10in., 3ft 8in
18.3ft 10in., 3ft 2in.

Geologic Description and Results

Light brown sand sediment
Disturbance on surfaxe level with modern debrus

Paleontological Resource Discovery

N/A

General Impressions/Observations:
Contiuned Ground Disturbance
19.3ft 11inch, 2ft 9.5in
20.2ft 11in, 3ft 10in- Rock exposes
21.3ft 8in, 4ft 1in
22.3ft 1in, 4ft 1in RB-3

Photos

Photo

Photo Description
Skeed Steer being directed

Photo

Photo Description
Skeed Steer makint hole

Photo

Photo Description
Excavated Hole

Photo

Photo Description
Skeed steer making hole

Photo

Photo Description
Exacated Hole

Photo

Photo Description
Excavated Hole

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 4, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Equipment: Water truck, skeed steer, and tree spade.
Depth, Width
1.2ft 2in,4ft 8in-Not used due to underlying rock
2.2ft 10in., 3ft 9in.
3.3ft 1in., 4ft
4.3ft 3in., 4ft 3in.
5.2ft 7in, 3ft 10in.
6.2ft 3in, 4ft 8in- Can't be used due ti the Caliche
7.3ft 3in, 4ft 2in.
8.2ft 8in, 3ft 8in
9.2ft 10in., 4ft 2in.
10.3ft 1in, 4 ft 1in.
11.2ft 3in., 4ft 1in.
12.3ft , 4ft 1in.
13.3ft 2in., 4ft 1in.
14.2ft 11in., 4ft 1in -Seeing rock exposed
15.3ft 7in, 2ft 10in.
16.3ft 3in, 4ft 3in.
17 3ft 3in, 3ft 10in.
18. 3ft 3in., 3ft 10in.
,

Geologic Description and Results

Lght brown sand sediment at about 3ft, after it gets to the white- highly indurated, and gravel caliche sediement.

Modern debris on surface level

Paleontological Resource Discovery
N/A

General Impressions/Observations:
Continued Notes.
18 3feet 3in, 3ft 10in.
Left Joshua Tree area at 12:45 PM, excavated area to see the sediment strata. It reaxhes 5ft deep, 12ft long, ane 7ft wide. At around 3-4ft it reached the caliche sediment..

19.4 ft, 2ft 3in.
20. 3ft , 3ft 10 in.- Yellow mixed rock sediment at the beginning.

Photos

Photo

Photo Description
Joshua Tree removed hole with Calchie sediments

Photo

Photo Description
Skeet Steer about to dig

Photo

Photo Description
Removed Joshua Tree Hole

Photo

Photo Description
Skeed Steer moving tree

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 6, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	15:00
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Joshua Tree relocation
Equipment-Skeed Steer, Water Truck, and Tree Spade
1.3f5 3in, 4ft 1in
2.3ft 3in, 3ft 9in
3.3ft 4in, 4ft 4in
4.3ft 4in, 4ft 4in
5.3ft , 4ft
6.3ft lin, 4ft 3in.
7.3ft 3in, 3ft 3in
8.3ft 1in, 4ft
9.3ft 7in, 4ft 6in
10. 3ft 2in, 4ft 2in
11.3ft, 4ft 2in
12. 3ft , 3ft 3in
131. 2frt 7in, 3ft 10in
14.2ft 10in, 4ft 1in
15.2ft 10in, 3ft 10in
16. 3ft 3in, 5ft
17.3ft 4in, 4ft 1ib

Geologic Description and Results

Light brown to yellowish brown sand with modern debris on top soil.
At about 3-4ft, the sedimenrs may show caliche rock and reddish brown sediments

Paleontological Resource Discovery

N/A

General Impressions/Observations:
Continue from above-
18.3ft 2in, 4ft 1in
19.3ft 2in, 4ft 3in
20.3ft 2in, 4ft 4in

Photos

Photo

Photo Description
Skeedsteer looking for tree

Photo

Photo Description
Skeed Steer moving to remove tree

Photo

Photo Description
Skeed Steer for Joshua Tree

Photo

Photo Description
Hole for Joshua Tree

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 7, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Equipment-Tree spade, Water truck, and skeed steer
Depth, Width
1.3ft 6in, 4ft 7in
2.3ft 6in, 4ft 6in
3.3ft 4in., 4ft 5in.
4.3ft 2in., 4ft
5.2ft 8in., 4ft 5in.
6.3ft 5in., 3ft 8in.
7.3ft 2.5in, 4ft 3in.
8.3ft 1in., 4ft 1in.
9.3ft 3in., 4ft 4in.
10.3ft 3in., 4ft 3in
11.3ft 2.5in, 4ft 1in.
12.3ft 1in, 4ft 3in
13.2ft 11.5in, 3ft 1in.
14.3ft 4in, 4ft 4in.
15.3ft 1in, 4ft 8in

Geologic Description and Results

Light brown sand
Modern debris on surface

Paleontological Resource Discovery

N/A

General Impressions/Observations:

Joshua Tree removal expected to end next Wednesday

Photos

Photo

Photo Description
Joshua Tree Hole

Photo

Photo Description
Skeed Steer heading to hole

Photo

Photo Description
Skeed Steer pulling tree out

Photo

Photo Description
Removed Joshua Tree Hole

Photo

Photo Description
Skeed steer coming to move tree

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 10, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:45
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Equipment: Water Truck, Skeed-Steer, and tree spade
Depth, Width
1 3ft , 3ft 4in
2.3ft 3in, 4ft 4ib
3.3ft 3in., 4ft 3in.
4.3ft 4.5in., 4ft 1in.
5.2ft 6in., 4ft
6.1ft 8in, 3ft 5in.
7.3ft 3in., 4ft 6in.
8.3ft 3in., 4ft 6in.
9.2ft 10.5in, 4ft 3in.
10.3ft 3in., 4ft 6in.
11.3ft 6in, 4ft 6in
12.3ft 5in, 4ft 5in
13. 2ft 10in, 4ft 1in.
14.2ft 3in, 4ft 2in
15.3ft 4in, 4ft 3in
16.2ft 11.5in, 4ft 5.5in
17.3ft 4in, 4ft 3in.
18 3ft 7in, 4ft 5in

Geologic Description and Results

Light yellowish brown sand with modern debris on the surface

Paleontological Resource Discovery

N/A

General Impressions/Observations:
18.3ft 3in, 4ft 5in
19.1ft 7in, 4ft 3in.
20.3ft 6in, 4ft 7in
21. 2ft 2.5in, 3ft 1.5ib
22.3ft 5in., 4ft 4in
Trench 69 is the field

No major discoveries or sediment changes

Photos

Photo

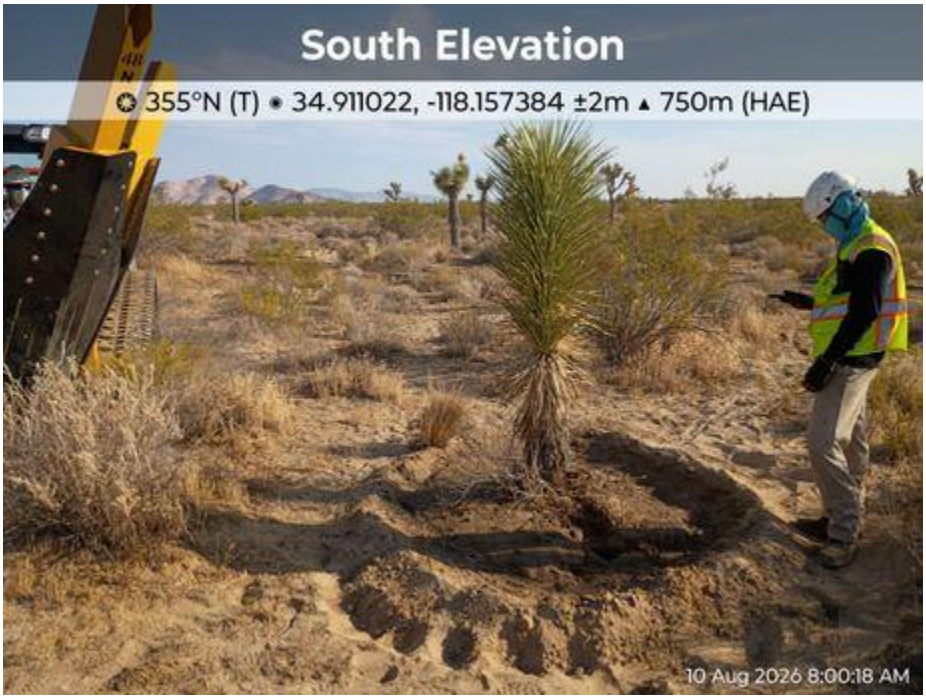


Photo Description
Joshua tree being set up for removal

Photo

Photo Description
Joshua Tree being planeted

Photo

Photo Description
Joshua Tree hole with Caliche rock

Photo

Photo Description
Joshua Tree hole made by removal

Photo

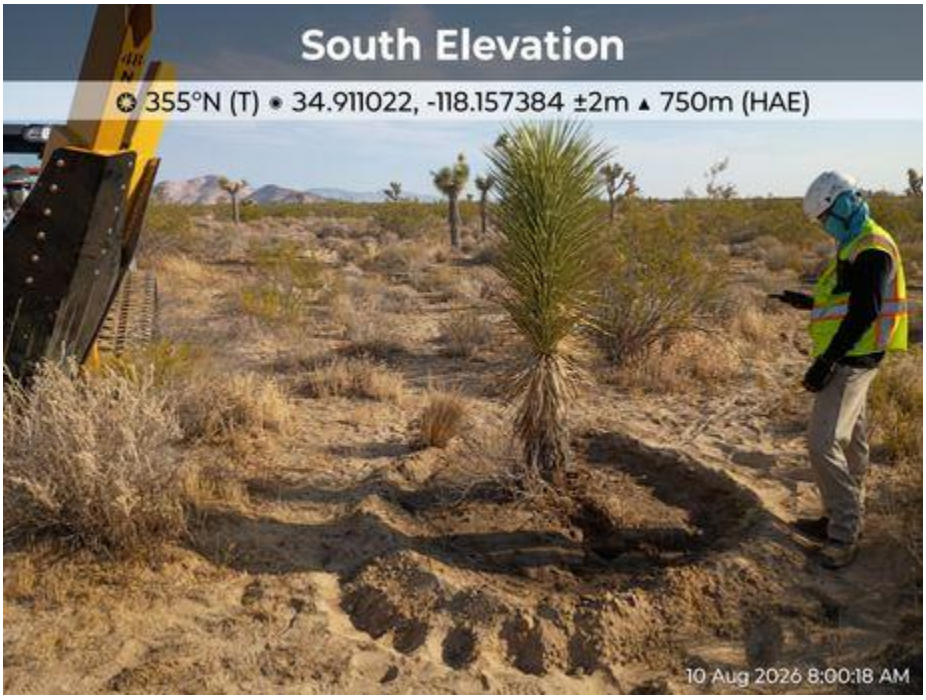


Photo Description
Joshua Tree about to be moved

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 11, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:45
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Equipment:Water truck, Skeed Steer, and Tree Spade
Depth, Width
1.1ft 3in, 4ft 2in
2.1ft, 3ft 9in
3.3ft , 4ft 2in
4. 3ft 1.5in, 4ft
5.3ft 3in, 4ft 2in
6.2ft 5in,3ft 8in
7.3ft 1.5in, 4ft 3in.
8.2ft 5in, 4ft 3in.
9.2ft 2in. 4ft 5in.
10.3ft 0.5in, 4ft 3in
11.3ft 1in, 4ft 2in.
12.3ft, 4ft 5in.
13.3ft 2.5in, 4ft 1in.
14.3ft 1in., 4ft 3in.
15.2ft 6in, 4ft 2in.
16.3ft 2in.,4ft 3in.
17.3ft, 4ft
18.2ft 9in, 4ft

Geologic Description and Results

Light brown yellow sand to light red brown sand sediments.
Modern debris on top of soil

Paleontological Resource Discovery

N/A

General Impressions/Observations:
19.3ft 1in, 4ft 1in
20.2ft 8in, 4ft 3in
21.3ft 5in, 4ft 4in
22.3ft 1in, 4ft
23.2ft 9in, 4ft 3in
24. 2ft 7.5in, 3ft 8in

No huge sediment changes

Photos

Photo

Photo Description
Skeed Steer planting tree

Photo

Photo Description
Skeed Steer navigating

Photo

Photo Description
Skeed Steer looking for tree

Photo

Photo Description
Joshua Tree Hole

Photo

Photo Description
Preparing Burms

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 13, 2026	**Time In:**	10:15
Location:	Kern County, California	**Time Out:**	14:15
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Spot Check near Sierra Highway
LxWxH
6x8x3
Equipment- Tree spade

Geologic Description and Results

Light brown yellow sand
Modern debris found on top soil
Dog bones found in spot check

Paleontological Resource Discovery

N/A

General Impressions/Observations:

No sediment change and nothint Paleontological to report.
Dog Bone appears modern

Photos

Photo

Photo Description
Spot Check area

Photo

Photo Description
Modern Dog Bones

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 17, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

No ground disturbance needed for Paleontology
Stayed on site for site meetings direction
Shadowed Cultural and Biology monitors

Geologic Description and Results

N/A

Paleontological Resource Discovery

N/A

General Impressions/Observations:

Ripping will begin tomorrow and need my services

Photos

Photo

Photo Description
Site Picture

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 25, 2026	**Time In:**	13:32
Location:	Kern County, California	**Time Out:**	13:35
Prepared By:	Koya Oki		

Ground Disturbance Activity
Test

Geologic Description and Results
Test

Paleontological Resource Discovery
Test

General Impressions/Observations:
Test

Photos

Photo

Photo Description
Test

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 21, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Equipment:Scrapper, Water Truck, Excavaror, Skeed-Steer
No depth over 2ft

I monitored early in the day tree removal to see any potential excavation over 2ft. I did'nt see any and then I spent the rest of the shadowing Biololgy and Cultutral Monitor monitoring

Geologic Description and Results

Light yellowish brown sand
Modern debris on top surface

Paleontological Resource Discovery

N/A

General Impressions/Observations:

No sediment over 2ft

Photos

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 24, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Equipment:Water and Ripper
Planned excavation for the day was to go beyond 2ft, but the excavation plan was changed and went to scrapping around 9am to 10am
I stayed on standy until the end of the day.

Geologic Description and Results

Light yellowish sand

Paleontological Resource Discovery

N/A

General Impressions/Observations:

Ripping never continued
A polyshape of the area was made.

Photos

Photo

Photo Description
Ripping location

Photo

Photo Description
Ripper going through site

Photo

Photo Description
Sire before ripping

Photo

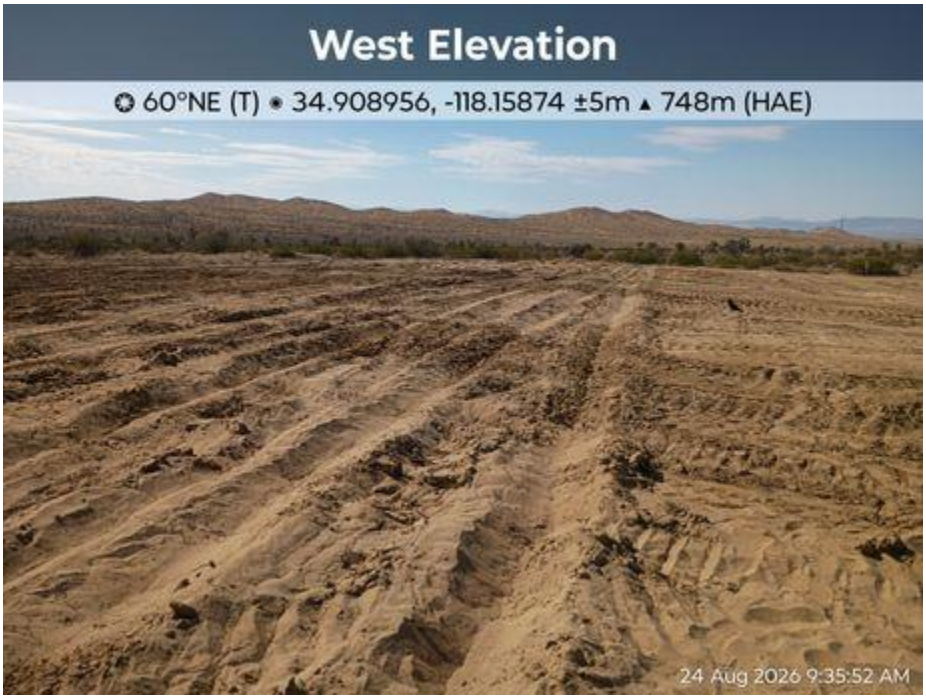


Photo Description
Ripping of sediments

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 25, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Ripping is put on hold, but could happen.
So I stayed on standbh

Geologic Description and Results

N/A

Paleontological Resource Discovery

N/A

General Impressions/Observations:

Stayed on standby
Ripping may happen tomorrow

Photos

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 26, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity
On Standby.
There was excavation beyind 2fr

Geologic Description and Results
N/A

Paleontological Resource Discovery
N/A

General Impressions/Observations:
Excavation going down to 10ft tomorrow

Photos

Photo

Photo Description
Site Picture

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 27, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	15:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Ground disturbance was near Dawn Road and behind Hatch trailer

V-ditch was made with a blade and water truck. The length was 20-30 ft, depth about 5ft, and length about 6-8ft.

Excavation for testing was done ar 3pm behind Hatch building. The depth was 10ft. Excavation was done b6 excavator and water truck

Geologic Description and Results

V-ditch- light brown sand

Excavation- Top layer was light brown sand with bottom layer being caliche and possible granite rock.

Paleontological Resource Discovery

N/A

General Impressions/Observations:

Bottok soils appears

Photos

Photo

Photo Description
Excavation Hole

Photo

Photo Description
V-ditch

Photo

Photo Description
Blade coming to cut V-ditch

Monitor Signature:

WRESC Paleontology Daily Monitoring Form

Project Name:	WRESC	**Company/Client:**	Hydrostor
Date:	August 28, 2026	**Time In:**	06:00
Location:	Kern County, California	**Time Out:**	14:30
Prepared By:	Dozie Itie		

Ground Disturbance Activity

Equipment used- Water Truck and Blade
Location-Near Dawn road and Sierra Highway
Dimensions-
Finished Previous V-Ditch
New V-Ditch made thats 20ft x 7ft x 5ft (LxWxH

Geologic Description and Results

Light brown sand with modern debris on top soil

Paleontological Resource Discovery

N/A

General Impressions/Observations:

No sediment changes at depth locations

Photos

Photo

Photo Description
Blade cutting V-ditch

Photo

Photo Description
Different perspective of V-ditch

Photo

Photo Description
V-Ditch

Monitor Signature:

ATTACHMENT G

WRESC CONSTRUCTION SAFETY SUPERVISOR MONTHLY REPORT AND VALLEY FEVER MANAGEMENT PLAN MONTHLY REPORT

Willow Rock Energy Storage Centre Weekly Construction Safety Report – August 2026

Below is the WRESC Construction Safety Supervisor's Monthly Compliance Report for August 2026 pursuant to Condition Worker Safety-3. The information below covers Limited Notice to Proceed Pre-Construction Activities which occurred from August 1 – August 31, 2026.

Incidents and Observations		
Type	**Number**	**Details**
Safety Observations	5	-
Recordables	0	-
First Aids	0	-
Near Misses	0	-
Vehicle	0	-
Personal Violations	0	-
Environmental	0	-
Other	0	-
Total Incidents	5	-

Below is a report on the specific items in Condition Worker Safety-3 to be included in each monthly safety inspection report:

- A record of all employees trained for that month (all records shall be kept on site for the duration of the project);

  A total of 36 workers were trained during the reporting period. All safety training record are kept at the WRESC site (WEAP Training Records and WRESC Site Safety Orientation) Safety Orientation and WEAP training records attached.

- A summary report of safety management actions and safety-related incidents that occurred during the month;

  A site safety stand down was held on August 13, 2026 with J&M Land Clearing regarding the use of the N-95 Respirator.

  Kicked off project Observation Program in August, will continue to enforce partcipation by workforce.

    - A report of any continuing or unresolved situations and incidents that may pose danger to life or health;

  No unresolved issues that pose dangers to life or health.

- A report of any visits from Cal OSHA and/or any complaints from workers to Cal OSHA;

  There were no Cal Osha visits during the reporting period nor any complaints from workers to Cal OSHA.

- A report of accidents, injuries, and near misses that occurred during the month.

  There were no accidents, injuries, or near misses during the reporting period.

Condition PH-1

During the reporting period, the following was done to maintain compliance with Condition PH-1

- *Consistent watering to control dust generation was performed during earth work activities.*
- *Personnel required to wear N95 respirators at all times, when not in a vehicle or mobile equipment outfitted with HEPA filtration*
- *All new hires provided requirements for Valley Fever Protection and Prevention during orientation including being given a Valley Fever Brochure*

Additional comments:

No additional comments

Submitted on 2026-Aug-31 by Joseph Chesno

Hatch Safety Manager

412-877-6007

Appendix A

Training Sheets

HYDROSTOR

Site Orientation Acknowledgement

I, the undersigned employee, hereby acknowledge that I have attended and participated in the orientation session for the Hydrostor facility. I understand and agree to comply with all rules, regulations and safety protocols as explained during the orientation and as outlined in the written policies provided.

I confirm that I received training relevant training to the tasks that I will be performing. I am aware that adherence to the safety and health requirements is essential not only for my own protection but also for the safety and well-being of my fellow workers and others who may be affected by our work activities

By signing below, I affirm my understanding and agreement with the safety procedures and policies as outlined.

Print:	Signature:	Contractor:	Date:
Michael Nachar		Tejon Indian Tribe	8/3/26
Dave Salmon.		Z AXIS IMAGES	8/3/26
Noor Zaraid		WSP	8/3/26
Thomas Stuart		WSP	8/3/26
Nick Bizzell		WSP	8/3/26
Sarah Williams		WSP	8/4/26
Angel Menchaca		WSP	8/4/26
Pablo Gutierrez		Granite	8/7/26
DAEM Thompson		GRANITE	8/13/26
Steven Wyatt		Granite	8-13-26

Attendance Record

HATCH

NAME OF EVENT	SITE SAFETY ORIENTATION
DURATION (HRS)	45 MINUTES
FACILITATOR	TEMP PROJECT CONSTN TRAILERS
DATE	17 AUG 26
TIMES	Start: 6:30 Finish: 7:15
VENUE	HYDROSTOR SAFETY ORIENTATION

PLEASE ENSURE THIS IS COMPLETED FOLLOWING YOUR TRAINING SESSION AND THEN FORWARDED TO THE HCLC COORDINATOR.

FULL NAME	COMPANY NAME	SIGNATURE
1. Cody Doolittle	Granite Construction	
2. Eric Martinez	Granite Construction	
3. Daniel Shafer	Granite construction	
4. Johnny Howard	Granite contruction	
5. Dave Vradenburg	Granite Construction	
6. Jerome Hessler	Granite	
7. Timothy Herrera	Granite	
8. Guillermo Penamora	Granite	
9. Alvaro Medina	Granite	
10. Isaac Perez	Granite	
11. THOMAS D. JAMES	GRANITE	
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		

HYDROSTOR

Site Orientation Acknowledgement

I, the undersigned employee, hereby acknowledge that I have attended and participated in the orientation session for the HYDROSTOR facility. I understand and agree to comply with all rules, regulations and safety protocols as explained during the orientation and as outlined in the written policies provided.

I confirm that I received training relevant training to the tasks that I will be performing. I am aware that adherence to the safety and health requirements is essential not only for my own protection but also for the safety and well-being of my fellow workers and others who may be affected by our work activities

By signing below, I affirm my understanding and agreement with the safety procedures and policies as outlined.

Print:	Signature:	Contractor:	Date:
Susan Strachan		Strachan Consulting	8/10/26
Lydia DeAngelis		HydroStor	8/10/26
Ryan Smith		WSP	8-10-26
Jorge Pino		Willscot	8-14-26
Vincent Lopez		Willscot	8-14-26
Andy Carrillo		willscot	8/14/26
Rudy Herrera		Willscot	8.14.26
Barbara Minor		Hydrostor	8/14/26
Todd Hopkins		@Quinn Capital	8/14/26
Owen Morse		Quinn Company	8/24/26
Quellen Andrews		Granite	8/24/26
Darryl Eber		Granite	8/24/26
Joe Chesno		Hatch	8/31/26
Kevin Boudreau		Hatch	8/31/26
Michelle Courtney		WSP	8/31/26

ATTACHMENT H

WRESC TRAFFIC MANAGEMENT PLAN REPORT

Traffic Management Report – August 2026

Below is the WRESC Traffic Management Report for August 2026 pursuant to CEC CoC TRANS-1 and the associated Construction Traffic Management Plan. The information below provides an update on traffic management activities which occurred from August 1 – August 31, 2026.

Traffic Management activities during the reporting period have included the following measures:

- Implementation of a designated parking lot onsite located along Dawn Road with appropriate delineators (Figure 1).
- Orientation training including information on site access and driving routes.
    - Employees have been instructed/trained to use HWY 14/Aerospace HWY when traveling to site, not Sierra HWY to minimize risk.
- Development of a signage plan which will be installed along the Sierra Highway in the next reporting period following the approval of the associated encroachment permit. Please see Appendix A outlining the proposed signage.

Figure 1: Current Site Conditions

Traffic Management Report submitted on 2026-Sept-8

Appendix A
Construction Signage

Bakersfield Branch
3005 James Road
Bakersfield, CA 93308
Ph. (661) 399-3361
Fax (661) 399-3598

Submittal #14

Date: 8/31/2026
Job No. 1910844
Attn: Dan Gonzalez
Re: Construction Signage (Rev 5)
Table 6C-1 (2014 CAMUTCD)

To: Hatch
601 South Figueroa St., Suite 4300
Los Angeles CA 94612

WE ARE SENDING YOU [X] Attached [ ] Under Separate Cover Via_____the Following Items:

[ ] Shop Drawings [ ] Prints [ ] Plans [ ] Samples [ ] Specifications
[ ] Copy of Letter [ ] Contract [ ] Subcontracts [ ] Invoices(s)
[X] Submittals [ ] Payroll Docs [ ] Certificate(s) of Insurance
[ ] Change Order Number _____ [ ] _____

Copies	Date or Number	Description
1	8/31/2026	Construction Signs (Rev 5)

THESE ARE TRANSMITTED AS CHECKED BELOW:

[X] For Approval [ ] Approved as Submitted [ ] Resubmit ____ Copies for Approval
[ ] For Your Use [ ] Approved as Noted [ ] Submit ___ Copies For Distribution
[X] As Requested [ ] Returned for Corrections [ ] Return ____ Corrected Prints
[ ] For Review and Comment [ ] _____
[ ] For Bid Due By The _____ [ ] Prints Returned After Loan To Us

Please Review and Approve

Copy To: Job File

Signed: Robert Smith
Project Engineer Intern

IF ENCLOSURES ARE NOT AS NOTED, KINDLY NOTIFY US AT ONCE.

All Traffic Control Will Meet MUTCD Standards
Safe Access to Pedestrians to be Maintained at all Times

Signs to be 48x48 Mounted on 4x6 Wooden Posts

Granite Construction
Dawn Rd & Sierra Hwy
Ansel, CA

Signs to be Post Mounted For the Duration of Work

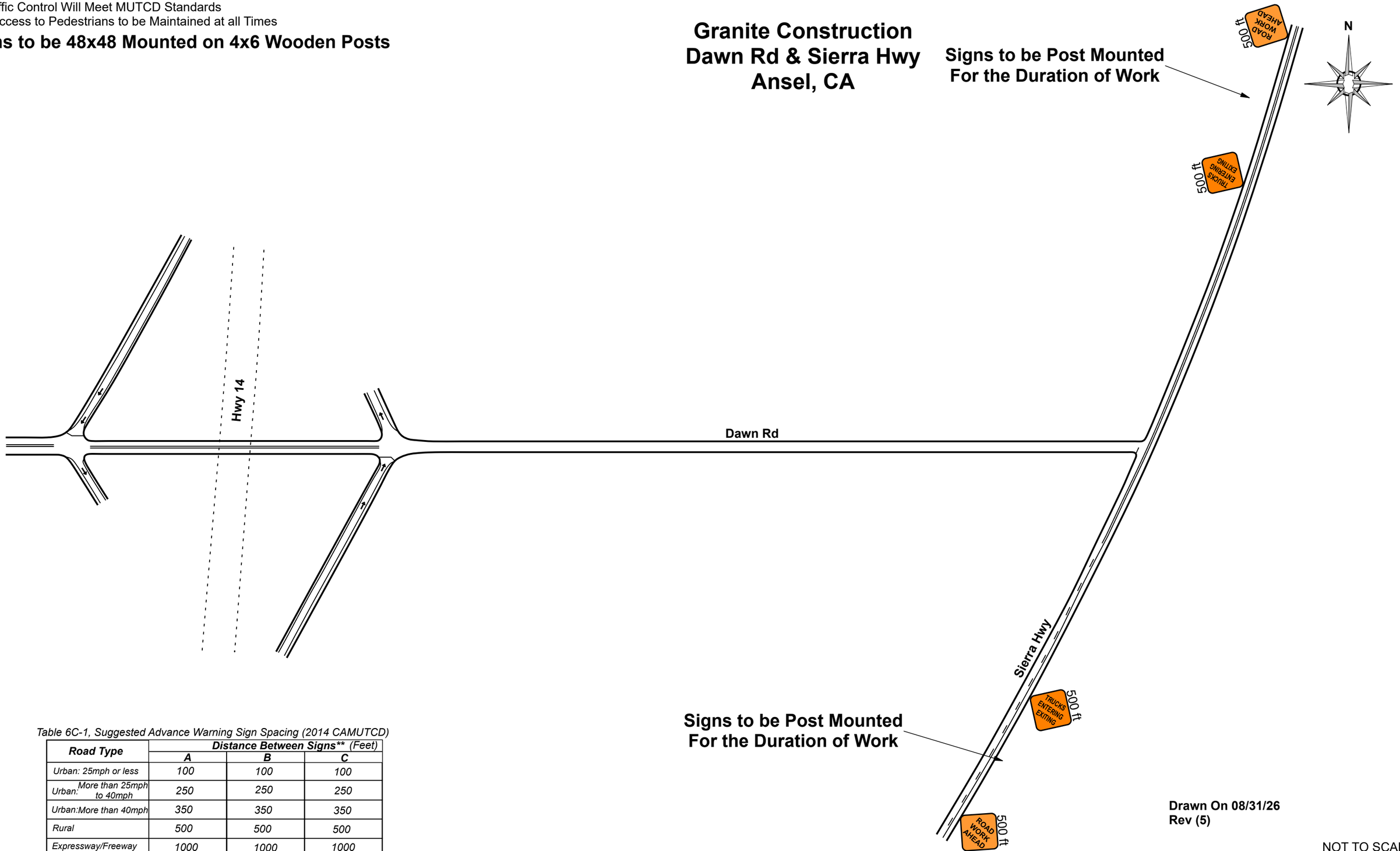


Table 6C-1, Suggested Advance Warning Sign Spacing (2014 CAMUTCD)

Road Type	Distance Between Signs** (Feet)		
	A	B	C
Urban: 25mph or less	100	100	100
Urban: More than 25mph to 40mph	250	250	250
Urban: More than 40mph	350	350	350
Rural	500	500	500
Expressway/Freeway	1000	1000	1000

Drawn On 08/31/26
Rev (5)

NOT TO SCALE

AVILA TRAFFIC SAFETY

Avila TS #: Tyler Ivison

Contractor: Granite Construction

PERMIT # / CAPITAL PROJ. # _____

TOTAL # OF DAYS: _____

WORK HOURS: _____

START DATE: _____

END DATE: _____

DAILY WORKING DAYS (Circle one)

RESPONSIBLE PARTY (CONTRACTOR) _____

ONSITE CONTACT: _____

PHONE NUMBER: _____

PHASE #: 1/2

PAGE #: 1/1

LEVEL: 1 (2) 3 (Circle one)

CITY TCP No: _____

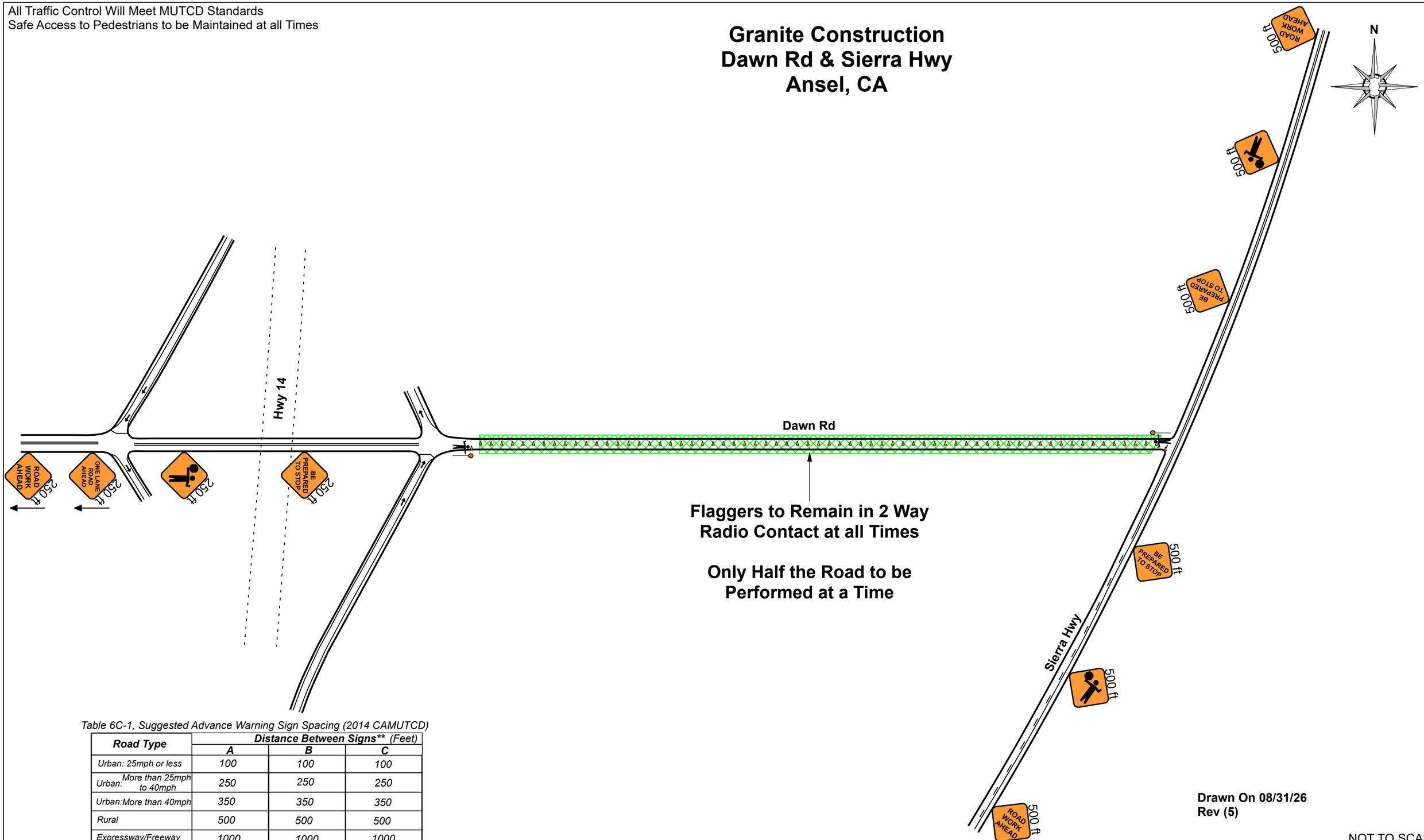
APPROVED FOR CITY PORTIONS ONLY

BY: _____

DATE: _____

All Traffic Control Will Meet MUTCD Standards
Safe Access to Pedestrians to be Maintained at all Times

Granite Construction
Dawn Rd & Sierra Hwy
Ansel, CA



Flaggers to Remain in 2 Way Radio Contact at all Times

Only Half the Road to be Performed at a Time

Table 6C-1, Suggested Advance Warning Sign Spacing (2014 CAMUTCD)

Road Type	Distance Between Signs** (Feet)		
	A	B	C
Urban: 25mph or less	100	100	100
Urban: More than 25mph to 40mph	250	250	250
Urban: More than 40mph	350	350	350
Rural	500	500	500
Expressway/Freeway	1000	1000	1000

Drawn On 08/31/26
Rev (5)

NOT TO SCALE

AVILA TRAFFIC SAFETY

Avila TS #: Tyler Ivison

Contractor: Granite Construction

PERMIT # / CAPITAL PROJ. # _____

TOTAL # OF DAYS: _____

WORK HOURS: _____

START DATE: _____

END DATE: _____

DAILY WORKING DAYS (Circle one)

RESPONSIBLE PARTY (CONTRACTOR) _____

ONSITE CONTACT: _____

PHONE NUMBER: _____

PHASE #: 2/2

PAGE #: 1/1

LEVEL: 1 (2) 3 (Circle one)

CITY TCP No: _____

APPROVED FOR CITY PORTIONS ONLY

BY: _____

DATE: _____

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS

REGISTERED CIVIL ENGINEER

September 20, 2024
PLANS APPROVAL DATE

THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.

REGISTERED PROFESSIONAL ENGINEER — Nathan V. Rogers — No. 087046 — Exp. 6-30-26 — CIVIL — STATE OF CALIFORNIA

NOTES:

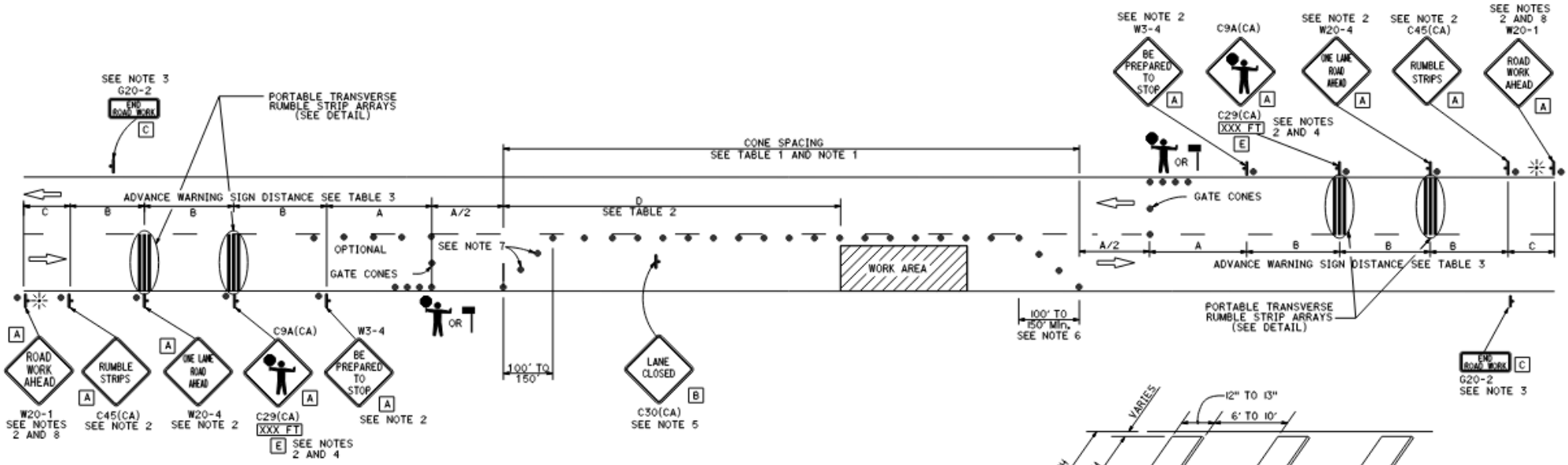
See Standard Plan T9 for tables.

Use cone spacing X for taper segment, Y for tangent segment or Z for conflict situations, as appropriate, per Table 1, unless X, Y, or Z cone spacing is shown on this sheet.

Provide at least one person to continuously maintain traffic control devices for lane closures.

SIGN PANEL SIZE (Min)

- A 48" x 48"
- B 30" x 30"
- C 36" x 18"
- D 36" x 42"
- E 20" x 7"

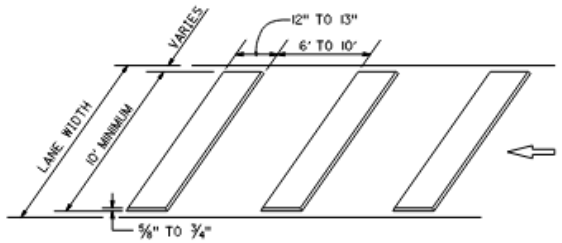


NOTES:

1. Portable delineators placed at one-half the spacing indicated for traffic cones may be used instead of cones for daytime closures only.
2. Sign must be equipped with at least two flags for daytime closures. Flags must be orange in color and at least 16 inches by 16 inches in size. Place flashing beacons as shown for closures during hours of darkness.
3. A G20-2 "END ROAD WORK" sign, shall be placed at the end of the lane closure unless the end of work area is obvious or ends within the larger project's limits.
4. An optional C29(CA) sign may be placed below the C9A(CA) sign.
5. Place C30(CA) "LANE CLOSED" sign at 500' to 1000' intervals throughout extended work area. They are optional if the work area is visible from the flagger station.
6. Length may be reduced by the Engineer to address site conditions.
7. Either traffic cones or barricades shall be placed on the taper. Barricades shall be Type I, II, or III.
8. If C45(CA) is not used, measure distance C from W20-4.

LEGEND

- TRAFFIC CONE
- TEMPORARY TRAFFIC CONTROL SIGN
- PORTABLE FLASHING BEACON
- FLAGGER
- AUTOMATED FLAGGER ASSISTANCE DEVICE (AFAD)



PORTABLE TRANSVERSE RUMBLE STRIP ARRAY DETAIL

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

TRAFFIC CONTROL SYSTEM WITH REVERSIBLE CONTROL ON TWO LANE CONVENTIONAL HIGHWAYS

NO SCALE

T13

T-1-24