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WILLOW ROCK
ENERGY STORAGE



October 2026

Monthly Compliance Report #8

Willow Rock Energy Storage Center 21-AFC-02C

Submitted by GEM A-CAES LLC

Monthly Compliance Report #8

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 eighth MCR for the WRESC Project. It covers project activities from September 1–30, 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 amendments, approved changes to CoCs, and 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 2**, 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 2**.

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. **Table 1** outlines the percent complete for early works as of September 30.

Table 1: WRESC Completion Percentage

	Engineering	Procurement	Construction
Early Works	80%	90%	35%

Engineering. Engineering activities during September focused on completing the remaining deliverables required to support FNTP and addressing DCBO review comments. Efforts were primarily directed toward revising the Stormwater Management Report and reissuing supporting civil drawings for regulatory review and approval. The following engineering plans and deliverables were submitted to the DCBO:

- Site Civil Plan
- Site Drainage Plan
- Erosion and Sediment Control Plan
- Civil Standard Detail Drawings
- Dawn Road Plan, Profile, Sections Drawings
- Southeast and Southwest Stormwater Management Basin Drawings
- Subsurface Pad and Access Roads Drawings
- Fencing Layout,
- Stormwater Management Report.
- Pavement Design Reports
- Overall (Final Condition) Drainage Layout Concept

In addition, a separate drawing for the proposed culvert crossing west of Dawn Road, including modifications to the Drainage 73 ephemeral flow path, was issued to support approval and permitting coordination with CEC and CDFW.

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

- Early Works Contract continues to be executed at site. No issues to date with contractor.
- The switchgear kick off meeting was held with Nexus and vendor engineering has commenced.
- Evaluation of circuit breaker proposals continued, with a planned award in October 2026.
- Proposals for site security services were received, and evaluations were initiated.
- Proposals were received in the "Early Contractor Involvement" process for the major construction work packages (civil/concrete, mechanical, piping, electrical,

instrumentation). Evaluations were initiated, and the planned award and kick off is anticipated for early October.

Construction. Construction activities during September included work associated with LNTP2. Activities during the reporting period included:

- Continued with clearing and grubbing throughout the Early Works Area, including the Environmentally Sensitive Areas (ESA) #4 which was released and cleared during the reporting period. Work in ESA #3 by WSP and the Cultural and Tribal Monitors continues.
- Biological, archeological, and tribal monitoring continued within areas yet to be cleared and grubbed.
- Removed and chipped/mulched Western Joshua Trees within the ESA #4.
- Completed the excavation of the southwest and southeast stormwater basins.
- Continued the development of the contractor's facilities and parking areas.
- Commenced the cut and backfill of the area for the subsurface contractor SER.
- Continued with the installation of the ditches for the Drainage Erosion and Sediment Control Plan (DESCP) for Phase 1.
- Temporary security fencing was completed.
- Permanent security fencing was started.
- Focus was placed on our project compliance inspection and reporting requirements.
- Pre-existing contaminated soils were removed from site and disposed of in accordance with the project's environmental requirements. The Waste Generator ID # and information required pursuant to Condition HAZ-3 will be provided during the October 2026 reporting period.

4. Key Events Schedule

The Key Events Schedule outlining the major milestones and activities associated with the Project is presented in **Table 2**. This Key Events Schedule is reflected in the latest Pre-Construction Compliance Matrix (see Section 5, below).

Table 2: Key Events Schedule

Event Description	Date
Finalize Site Control of All Parcels	March 2025
Project Certification	December 2025
Start of Commercial Operation	July 2030

Event Description	Date
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
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	

Event Description	Date
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 FNTP. 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 FNTP 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.

During the reporting period, focus was on obtaining final approval for these pre-construction conditions. **Attachment B** includes the Pre-Construction Condition Matrix with the status of the conditions as of September 30, 2026.

Compliance Activities. **Table 3** provides a list of the compliance documents that were submitted during the reporting period, as well as any comments and approvals received from the CPM and its Delegate Chief Building Official (DCBO). Please note, the Facility Design conditions requiring submittal of construction drawings and specifications are tracked in the DCBO daily submittal log.

Table 3: Submitted Compliance Documents

[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-1	Bio Monitor qualifications submitted for Glen Kinoshita and Ryan Smith Bio Monitor qualifications submitted for Gracey George	September 10, 2026 September 18, 2026		September 16, 2026 September 24, 2026
BIO-6	BRMIMP Rev. 3 BRMIMP Rev.4 BRMIMP Rev. 5	September 4, 2026 September 23, 2026 September 28, 2026	September 15, 2026 September 25, 2026	 September 28, 2026
BIO-13	Crotch's Bumble Bee Survey Report	September 16, 2026		September 19, 2026
BIO-15	Special-Status Reptiles Survey report	September 16, 2026		September 18, 2026
BIO-16	DT Survey Report DT Survey Report Rev. 1	September 16, 2026 September 23, 2026	Sept. 19, 2026	 Survey Report Approved by CEC on September 24, 2026

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
BIO-17	Nesting Bird Survey Report Rev. 1	September 1, 2026	August 28, 2026	September 1, 2026
BIO-24	Revised Updated State Jurisdictional Waters Report Drainage 73 Drawings and H&H Study	August 27, 2026 September 25, 2026	September 9, 2026 September 25, 2026 CDFW and CEC comments rec'd	Plan approved Sept. 9, 2026; however, add'l info re: Drainage 73 requested September 29, 2026
CUL-3	CTRMMP Rev. 1 CTRMMP Rev. 2	August 15, 2026 September 22, 2026	September 3, 2026 September 25, 2026	 September 30th, with contingencies
LAND-3	County Franchise Agreement	September 14, 2026		September 29, 2026
PAL-1	Alternate PRS Michelle Courtney Qualifications for PRM Carlos Martinez	August 11, 2026 September 8, 2026		August 11, 2026 September 10, 2026
WATER-1 (Note: Civil-1 Status is tracked in daily DCBO log)	Stormwater Mgmt Report DESCP	August 6, 2026 August 11, 2026	DCBO Comments August 12, 2026 CEC DESCP Comments 8/12/2026	

CoC #	Description	Submitted to CPM	CEC Comments Received	CPM Approval Date
	Stormwater Report Response to Comments DESCP Rev. 1	August 18, 2026	DCBO Comments August 13, 2026	Early Works Approval August 18, 2026
WATER-2	SWRQCB Invoice and Receipt of WDR annual fee payment	Sept. 11, 2026		
Worker Safety-1	Construction Fire Protection Plan Rev. 3	September 21, 2026		September 23, 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
Worker Safety-6	Water and Soil Test Results	September 28, 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 **Attachment 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 37 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**. 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 prior to the change in monitoring and be included in the MCR.
- **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**.
- **TRANS-1:** The status of all construction-related traffic management on-site and in the project area. This information is included in **Attachment H**. (This requirement is based on a requirement included in the WRESC Traffic Management Plan.
- **WATER-1:** A narrative on the effectiveness of the drainage, erosion, and sediment-control measures and the results of monitoring and maintenance activities is included in **Attachment I**.
- **WATER-7:** 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, included in **Attachment J**.
- **WORKER SAFETY-3**: The Construction Safety Supervisor's report is included in **Attachment G**.

6. Status of Delayed Submittals

There were no late submittals during the reporting period. Compliance documents submitted during the reporting period consisted of revisions addressing CEC comments.

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

At this time, there have been no amendments to the WRESC which have been submitted and approved. However, 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 4 identifies meetings and compliance documents submitted to other governmental agencies during the reporting period.

Table 4: Other Governmental Agency Meetings and Submittals During Reporting Period

Government Agency	File/Permit/Engagement	Date
DSOD	Meeting with DSOD, CEC, DCBO, and Hydrostor (GEM)	Sept. 8, 2026
Kern County Public Works Department	Permit for Granite construction to start construction of Dawn Road improvements	September 8, 2026
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 PB-1, PH-1, TRANS-2, and Worker Safety-1.	Sept. 30, 2026

9. Compliance Activities to Be Conducted in October/November

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

- GEN-2: Master Drawing and Specification List for Later Works activities
- HAZ-3: Waste Generator ID # and required information
- Worker Safety-1: Revised Construction Fire Prevention Plan
- Worker Safety-5: Construction Controlled Detonations 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 were ordered in mid-September and will be located on-site by October 12, 2026. 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

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

KEY MILESTONES:

Start of special status bio surveys	4/13/2026
Start pre-construction activities	7/20/2026
Obtain NTP for Early Works construction activities	8/14/2026
Start Early Works site mobilization	8/17/2026
Start grading of Dawn Rd, subsurface pad, laydown area, internal roads, and parking	8/24/2026
Start Later Works site mobilization	10/8/2026
Start Later Works site grading: reservoir excavation	3/1/2027
Start of cavern construction at depth	12/1/2028

Color Codes:
Submitted to CPM
Conditional approval by CPM
Complete / Approved by CPM

Condition of Certification (sorted alphabetically)	Description (always refer to Appendix A of Final Decision for detailed language)	Verification/Action/Submittal Required by Project Owner	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date To HDS for Review	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
AQ-SC1	Designate an on-site Air Quality Construction Mitigation Manager (AQCMM) and delegate AQCMMs.	Submit to the CPM for approval the name, resume, qualifications, and contact info for the AQCMM and all AQCMM delegates	At least 30 days prior to ground disturbance	WSP	Complete	Complete	6/26/2026	7/3/2026	6/26/26: WSP submitted to CPM 7/3/26: CPM email approval
AQ-SC2	Provide an AQCMP that details the steps that will be taken and the reporting requirements necessary to comply with AQ-SC3, AQ-SC4, and AQ-SC5.	Submit the AQCMP to the CPM for approval.	At least 30 days prior to ground disturbance	WSP	Complete	Complete	6/29/2026	7/3/2026	6/29/26: WSP submitted plan to CPM 7/3/26: CPM email approval
AQ-SC3	Item 17: Signs shall be posted at the project site entrance and written notifications shall be provided to residential land uses within 1,000 feet of the project site. The signs and written notifications shall include the following information: (a) Project Name; (b) Anticipated Construction Schedule(s); and (c) Telephone Number(s) for designated construction activity monitor(s) or, if established, a complaint hotline.	The signs and written notifications shall include the following information: (a) Project Name; (b) Anticipated Construction Schedule(s); and (c) Telephone Number(s) for designated construction activity monitor(s) or, if established, a complaint hotline.	a minimum of 30 days prior to initiation of project construction to residential land uses within 1,000 feet of the project site.	Hydrostor	Complete	Complete	7/7/2026	7/9/2026	7/7/26: Strachan Consulting emailed sign design to CPM. 7/9/26: CEC email approval
BIO-1	DB Selection: Assign at least one Designated Biologist to the project.	Submit to the CPM for approval the resume(s) and any other relevant documentation.	At least 75 days prior to start of site mobilization	WSP	Complete	Complete	2/27/2026 4/22/2026	4/28/2026 for only Moss, Paris, Kraft, Moorhatch, Chumley, Wilcox	3/19/26: CPM requested additional info to complete their review and approval. WSP emailed info in response to CEC request. 4/28/26: CPM email approval

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

Condition of Certification (sorted alphabetically)	Description (always refer to Appendix A of Final Decision for detailed language)	Verification/Action/Submittal Required by Project Owner	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date To HDS for Review	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
BIO-3(a)	Biological Monitor Selection: The Designated Biologist shall provide resumes and contact info for Biological Monitors.	Submit the required info to the CPM for review and approval and CDFW for review and comment.	At least 30 days prior to the start of any site mobilization activities.	WSP	Complete	Complete	2/27/2026 4/22/2026	4/28/2026 for only Urquidi, West, Moreno, Williams, Bukovac, Oki 5/27/26: Bend	3/19/26: CPM requested additional info to complete their review and approval. WSP emailed info in response to CEC request. 4/23/26 Email from Ashley Gutierrez requested additional references for 3 bio monitors. 4/24/26 Jeremy Paris emailed reference info to CPM.
BIO-3(b)	The DB will be responsible for training in Biological Monitors prior to onsite monitoring work	The DB shall submit a written statement to the CPM confirming that individual BM's have been trained, including the date when training was completed.	Within 10 days of training	WSP	Complete	Complete	7/8/2026	7/13/2026	7/8/26: Strachan Consulting emailed WSP letter to CPM 7/13/26: B. Fooks email indicates BIO-1 is approved
BIO-5	Worker Environmental Awareness Program: develop and implement a project-specific WEAP	Submit the draft WEAP to the CPM for review and approval and to CDFW for review and comment.	At least 45 days prior to the start of site mobilization	WSP	Complete	Complete	5/29/2026	7/15/2026	5/29/26 WSP emailed to CPM without hardhat sticker 6/3/26: WEAP sticker emailed from SS to CPM 6/12/26: CPM email requesting additional information in a red-line 7/2/26: WSP emailed updated plan to CPM 7/8/26: Received comments from CPM 7/10/26: WSP emailed WEAP (redline, light, Spanish version, wallet card, Tribal documentation) to CPM 7/14/26: Received comments from CPM 7/15/25: WSP emailed revised version to CPM 7/15/26: CPM email approval

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

Condition of Certification (sorted alphabetically)	Description (always refer to Appendix A of Final Decision for detailed language)	Verification/Action/Submittal Required by Project Owner	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date To HDS for Review	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
BIO-6(a)	Develop a Draft Biological Resources Mitigation and Implementation and Monitoring Plan BRMIMP).	Submit draft BRMIMP to CPM for review and approval	At least 45 days prior to the start of site mobilization	WSP	Complete	Complete	5/28/2026	7/28/2026	7/16/26: WSP emailed final to CPM. 7/17/26: CPM provided **Conditional Approval until July 28** -- requests revised version based on provided sample BRMIMP and also address operations and decommissioning 7/28/26: WSP emailed Rev2 to CPM
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	Complete	With CEC for final approval	8/14/2026		5/28/2026: WSP emaild BRMIMP Rev. 0 to CPM 7/10/26: CPM emailed comments on BRMIMP` 7/14/2026: WSP emailed BRMIMP Rev. 1 7/17/2026: CPM emailed comments on BRMIMP Rev. 1 7/28/26: WSP emailed Rev2 to CPM 8/14/26: CPM emailed list of 18 items that need to be addressed in BRMIMP 8/14/26: Hydrostor emailed acceptance of requested changes to Rev2 9/4/26: WSP submitted revised BRMIMP Rev. 3 to CPM 9/15/2026: CPM emailed comments on revised BRMIMP 9/23/26: WSP Submitted revised BRMIMP Rev. 4 9/25/2026: CPM emailed comments on the revised BRMIMP. 9/28/26: WSP submitted BRMIMP Rev. 5 9/28/26: CPM approved BRMIMP Rev. 5

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

Condition of Certification (sorted alphabetically)	Description (always refer to Appendix A of Final Decision for detailed language)	Verification/Action/Submittal Required by Project Owner	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date To HDS for Review	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
BIO-6(d)	To verify that the extent of construction disturbance does not exceed that described in these conditions, the project owner shall submit aerial photographs, at an approved scale, taken before and after construction to the CPM and CDFW.	The first set of aerial photographs shall reflect site conditions prior to any preconstruction site mobilization and construction activities	Submit photographs prior to the start of construction	Hydostor	Complete	Complete	7/1/2026	7/5/2026	7/1/26: WSP provided link to CPM to download photo file 7/10/26: CPM provided comment 7/14/26: WSP transmitted photos with scale to CPM 7/5/26: CPM email approval
BIO-7	Prepare a Wildlife Protection and Relocation Plan	Submit draft plan to CPM for review and comment	At least 45 days prior to site mobilization	WSP	Complete	Complete	6/25/2026	7/10/2026	6/25/26: WSP emailed plan to CPM 6/29/26: CPM provided email requesting additional information 7/2/26: WSP submitted revised/red-lined plan to CPM 7/6/26: CPM provided comments and requested red-line version 7/9/26: WSP provide revised version to CPM 7/10/26: CPM email approval
BIO-8(a)	Develop a Draft Vegetation Management Plan	Provide draft VMP to the CPM for approval.	At least 45 days prior to start of site mobilization	WSP	Complete	Complete	6/22/2026	7/15/2026	6/22/26: WSP emailed plan to CPM 7/1/26 CPM emailed comments 7/14/26: WSP transmittal of Desert Botanist resume to CPM 7/15/26 CPM approved Desert Botanist
BIO-8(b)	Develop a Final Vegetation Management Plan	Provide the Final VMP to the CPM and CDFW.	At least 7 days prior to start of site mobilization	WSP	Complete	With WSP to respond to CEC comments received 8/7	8/12/2026	8/14/2026	7/13/26: WSP submitted Rev1 to CPM 7/15/26: CPM emailed comments 7/20/26: WSP submitted Rev2 to CPM 7/23/26: CPM emailed comments 7/31/26: WSP submitted Rev3 to CPM in both redline and final formats 8/7/26: CPM returned CEC/CDFW comments on Rev3 8/12/26: WSP submitted Rev4 to CPM 8/14/26: CEC email approval

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

Condition of Certification (sorted alphabetically)	Description (always refer to Appendix A of Final Decision for detailed language)	Verification/Action/Submittal Required by Project Owner	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date To HDS for Review	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
BIO-9(a)	Develop an Integrated Weed Management Plan in consultation with the Designated Biologist.	Submit the Draft IWMP to the CPM for review and approval	At least 60 days prior to the start of pre-construction site mobilization	WSP	Complete	Complete	5/28/2026	7/17/2026	5/28/26 WSP emailed plan to CPM 6/12/26: CPM provided email requesting additional information be provided in a red-line version
BIO-9(b)	Provide the Final Integrated Weed Management Plan	Submit the Final IWMP to the CPM and CDFW	At least 7 days prior to the start of site mobilization	WSP	Complete	Complete	7/15/2026	7/17/2026	7/15/26: WSP submitted plan to CPM 7/16/26: CPM emailed CEC/CDFW comments 7/16/26: WSP emailed Rev 2 to CPM 7/17/26: CPM email approval
BIO-10(a)	Develop a Draft Invasive Species Management Plan	Provide a draft Invasive Species Management Plan to the CPM for review and approval	At least 45 days prior to the start of site mobilization	WSP	Complete	Complete	5/20/2026	7/17/2026	5/20/26: Submitted by WSP to CPM 6/19/26: Email from A. Gutierrez requesting additional information for BIO-10 with note that CEC is requesting clarification from CDFW on Item 5. 6/24/26: CPM emailed comments
BIO-10(b)	Develop and implement a Final Invasive Species Management Plan.	Provide the Final ISMP to the CPM for approval. No site mobilization, ground disturbance, or construction activities may occur prior to this approval.	At least 7 days prior to the start of site mobilization	WSP	Complete	Complete	7/15/2026	7/17/2026	7/15/26: WSP submitted final plan to CPM 7/16/26: CPM emailed additional comments 7/16/26: WSP emailed Rev 2 to CPM 7/16/26: CPM emailed comment 7/16/26: WSP emailed Rev 3 to CPM 7/17/26: CPM email approval

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

Condition of Certification (sorted alphabetically)	Description (always refer to Appendix A of Final Decision for detailed language)	Verification/Action/Submittal Required by Project Owner	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date To HDS for Review	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
BIO-11(a)	Develop and submit the proposed Special Status Plants Annual Survey Plan.	Submit the plan to the CPM for review and approval.	45 days prior to commencing surveys	WSP	Complete	Complete	5/6/2026	6/25/2026	5/6/26: Submitted by WSP:--no special status plants found 5/22/26: CPM provided comments 6/19/26: Email from A. Gutierrez requesting additional information for BIO-11 6/23/26: WSP submitted revied plan to CPM 6/26/26: CPM email approval.
BIO-11(a)	Prepare and submit the Special Status Plants survey report.	Submit the plan to the CPM for review and approval.	Annually	WSP	Complete	Complete	7/31/2026	8/3/2026	7/31/26: WSP transmitted survey report to CPM 8/3/26: CEC email approval
BIO-12(a)	Submit an updated Western Joshua Tree Census and WJT Relocation Plan	Submit the updated WJT Census and draft Western Joshua Tree Relocation Plan to the CPM for review and approval, in consultation with CDFW	No less than 45 days prior to commencing any project activities that will impact WJTs, including site mobilization and/or construction	WSP	Complete	Complete	5/1/2026	7/17/2026	5/1/26: Submitted by SS 5/22/26: CPM provided comments, including those by CDFW

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

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BIO-12(b)	Submit the Final Western Joshua Tree Relocation Plan	Submit the required final plan to the CPM and fees to CDFW Region 4.	Prior to any project activities that will impact WJT	WSP	Complete	Complete	6/22/2026	7/17/2026	6/22/26: WSP emailed updated Final Plan to CPM 7/6/26: CPM returned additional comments and requested a red-line version be returned. 7/9/26: WSP provided resume of Senior Desert Botanist 7/10/26: WSP emailed final plan to CPM 7/14/26: WSP re-transmittal of WJT Relo Plan 7/15/26: CPM provided additional comments 7/15/26: Title of Villa Haines and memo re: the initiation of BIO-14 mitigation efforts provided to CPM. 7/15/26: B. Fooks requested additional info re: Villa Haines title. 7/16/26: N. Eckert provided responses to B. Fooks questions and a new title. 7/17/26: WSP submitted revised final plan to CPM. 7/17/26 CPM email approval
BIO-12(c)	Pay the WJTCA mitigation fees	Submit the fee payment to CDFW Region 4.	Prior to any project activities that will impact WJT	Hydrostor	TBD		8/11/2026	8/14/2026	8/6/26: CPM email requesting more specific info needed to calculate relocation fees; sample table provided. 8/11/26: WSP emailed updated table to CPM. 8/14/26: CEC provided mitigation fee invoice; due by 12/31/26 8/17/27: CEC requiring payment before issuance of LNTP#2 8/19/26: Check delivered to SDFW; CEC confirmed 8/20/26

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BIO-13(a)	Prepare a draft Crotch's Bumble Bee Mortality Reduction and Relocation Plan	Submit the draft plan to the CPM for review and approval and to the CDFW/for review and comment.	No less than 45 days prior to commencing surveys	WSP	Complete	Complete	5/13/2026	7/15/2026	5/13/26: Submitted by WSP 6/19/26: Email from A. Gutierrez requesting additional information for BIO-13
BIO-13(b)	Prepare a final Crotch's Bumble Bee Mortality Reduction and Relocation Plan	Submit the final plan to the CPM and CDFW	At least 7 days prior to the start of site mobilization	WSP	Complete	Complete	7/8/2026	7/15/2026	7/9/26: WSP submitted final plan to CPM 7/15/26: CPM email approval
BIO-13(c)	Colony Active Period Season Survey (Feb. 1-Sept.30 Pre-Construction Survey & Observational Submittal	Conduct surveys prior to site mobilization	No more than 10 days prior to initiating or resuming project activities	WSP	7/1/2026	Complete	Complete	N/A	Surveys conduced in July 2026
BIO-13(d)	Provide results of each CBB survey	Provide to the CPM for review and approval and to CDFW for review and comment	No more than 45 days after the completion of surveys	WSP	Interim report 8/14/26			8/17/26 Conditional approval	8/14/26: WSP emailed Technical Memo documenting findings of pre-construction bio surveys 8/17/26: CEC conditional approval 9/16:26: WSP Submitted survey report 9/19/2026: CPM approvd the report.

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BIO-14	Habitat Management Land Acquisition: The project owner shall submit detailed maps identifying areas of permanent and temporary habitat loss, areas avoided, and areas exempt under this condition. If the project owner elects to provide for the acquisition, permanent protection, and perpetual management of habitat management lands, the project owner may proceed with activities only after the project owner has ensured the funding (Security) to complete any activity required for Habitat Management Land Acquisition and Protection that has not been completed before the activities begin.	Provide details maps to the CPM for approval, in consultation with CDFW. The project owner may proceed with project activities only after the project owner has ensured the funding.	Prior to EW site mobilization	Hydrostor/ WSP	Complete	Complete	7/17/2021	7/21/2026	7/16/26: WSP emailed Technical Memo to CPM re: confirmation of commitment to dedicate the Villa Haines property as Permitee-Responsible Mitigation Land 7/15/26: HDS provided Title of Villa Haines to CPM. 7/15/26: B. Fooks requested additional info re: Villa Haines title. 7/16/26: N. Eckert provided responses to B. Fooks questions and a new title.
BIO-14(b)	If the project owner elects to provide for the acquisition, permanent protection, and perpetual management of habitat management lands, the project owner may proceed with activities only after the project owner has ensured the funding (Security) to complete any activity required for Habitat Management Land Acquisition and Protection that has not been completed before the activities begin.	The project owner may proceed with project activities only after the project owner has ensured the funding.	Security - Prior to the start of Early Works project activities	Hydrostor	Complete	Complete	7/17/2026	7/21/2026	7/17/26: $6.4M letter of credit delivered to B. Fooks 7/21/26: CPM email confirming receipt of LOC
BIO-15(a)	Provide proposed annual survey plan for Special Status Reptile Species	Submit the proposed annual survey plan 45 days prior to commencing the surveys to the CPM for review and approval and to the CDFW for review and comment.	45 days prior to conducting surveys	WSP	Complete	Complete	Rev 0 submitted 3/11/2026 Rev 1 submitted 4/6/26	4/16/26	4/16/26: CPM email approval
BIO-15(b)	Provide the final survey plan for Special Status Reptile Species to the CEC	Submit the final Special Status Reptile Species plan to the CPM	At least 10 days prior to start of any site mobilization	WSP	Complete	Complete	4/6/2026	4/16/2026	4/16/26: CPM email approval

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BIO-15(c)	Conduct Special Status Reptile Species protocol surveys	Conduct surveys	One week prior to ground disturbance and within 24 hours of beginning work in suitable habitat	WSP	Complete	Complete			
BIO-15(d)	Prepare Special Status Reptile Species pre-construction survey report, including location of the microhabitats for these species and locations to place cover boards or rake soils.	Submit to the CPM and CDFW	Within 7 days of completing the surveys	WSP	In progress	Interim report 8/14/26	With CEC for approval		8/14/26: WSP emailed Technical Memo documenting findings of pre-construction bio surveys 8/17/26: CEC table shows received and complete 9/15/2026: WSP emailed survey report to CPM. 9/18/26: CPM emaled approval of plan.
BIO-16(a)	Prepare a Proposed Annual Survey Plan for Desert Tortoise	Submit the proposed annual DT survey plan to the CPM for review and approval and to the CDFW for review and comment.	45 days prior to commencing surveys	WSP	Complete	Complete	3/10/2026	4/16/2026	3/19/26: CPM email requested additional info. 4/6/26: Plan resubmitted to CPM 4/16/26 CPM email approval
BIO-16(b)	Conduct DT protocol surveys	Submit the pre-construction protocol survey reports to the CPM, CDFW, and USFW	No more than 45 days after each survey effort has been completed	WSP	Complete	Complete			
BIO-16(c)	Conduct DT clearance surveys within areas of found suitable habitat	Conduct clearance surveys 1 week prior to ground disturbance	1 week prior to ground disturbance	WSP	Complete	Complete			
BIO-16(d)	Conduct DT clearance surveys within areas of found suitable habitat	Conduct clearance surveys 24 hours prior to ground disturbance	24 hours prior to ground disturbance	WSP	Complete	Complete			
BIO-16(e)	If DT or active burrows are detected during pre-clearance surveys, stop work within 200 feet of any potential burrow or DT.	DB to contact the CPM, CDFW, and USFWS immediately for guidance.	As required	WSP	Complete	Complete			

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BIO-16(i)	Prepare a report documenting the DT survey results and other specific information required in the CoC	Submit report to CPM, CDFW, and USFWS	Within 14 days after completing surveys	WSP		Interim report 8/14/26	With CEC for approval		8/14/26: WSP emailed Technical Memo documenting findings of pre-construction bio surveys 8/17/26: CEC table shows conditional approval 9/16/2026: WSP submitted survey report 9/19/2026: CPM provided comments 9/23/2026: WSP emailed to CPM DT Survey Report Rev. 1 9/24/2026: CPM approved DT Survey Report Rev. 1.

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BIO-16(f)	Install DT 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.	During pre-construction surveys per CPM 3/16/26 email	Hatch	Complete	Complete	6/17/2026 6/25/26 8/4/26 DCBO states drawing is still missing requested information		6/3/26: Email from CEC Staff Alex Single confirmed the project does not need DT fencing around the entire site just areas to be impacted by significant activity including earthmoving, WJT removal, parking, and lay-down/staging areas. Fencing installation can be delayed in project areas where no work would take place yet. CEC Biology staff confirm that the project does not need DT fencing around the relocation sites. 6/25/26: Fencing specs sent to CPM 6/27/26: DT fencing specs to DCBO 7/13/26: CPM emailed comments 7/16/26: Strachan Consulting emailed WRESC response to CEC comments 7/17/26: Strachan Consulting emailed CPM confirmation that permanent fencing on north side of Dawn Rd will be installed at a depth to prevent DT from entering the site. 7/28/2026: DT fencing details to CPM 8/4/2026: DT fencing to DCBO 8/5/2026: DCBO requested that DT fencing be included on Construction Site Plan 8-13-26: DCBO approval of DT fencing

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BIO-16(g)	Prepare and implement a Raven Management and Reporting Plan consistent with CDFW and USFWS raven management guidelines.	Submit the plan to the CPM for review and approval in coordination with the CDFW and USFWS.	Prior to the start of site mobilization	WSP	Complete	Complete	5/20/2026: Draft Plan 6/24/26: Final Plan	7/15/2026	5/20/2025: WSP emailed plan to CPM 6/2/16: Request for Additional Information received from CPM 6/24/26: WSP emailed final plan to CPM 6/26/26: CPM provided additional comments from CEC/CDFW 7/10/26: WSP emailed final plan to CPM 7/10/25: CPM provided additional comments 7/14/26: WSP forward final plan to CPM 7/15/26: CPM email approval
BIO-16(h)	The Project Owner shall contribute to the USFWS Regional Raven Management Program by making a one-time payment of $105 per acre of long-term or permanent project disturbance.	Submit receipt of payment to the USFWS Regional Raven Mgmt Program.	14 days prior to the start of site mobilization activities	Hydrostor	Complete	Complete	7/15/2026	7/21/2026	6/23/26: CPM submitted REAT Deposit document to CDFW 6/26/26: CDFW requested revisions and resubmittal by CEC 7/14/26: NFWF confirmed receipt of payment of $11,718 7/15/26: Strachan Consulting submitted receipt to CPM 7/21/26: Requested CPM approval email during 7/21 Teams Meeting 7/21/26: CPM confirmed receipt of payment confirmation.

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BIO-17(a)	Nesting Bird Avoidance & Minimization: Prepare a Nesting Bird Management Plan per Items 6a-h in the Condition.	Submit the Nesting Bird Management Plan to the CPM for review and approval.	Condition does not include a timeframe.	WSP	Complete	Complete	5/21/2026	7/15/2026	5/21/26: WSP emailed plan to CPM 6/16/26: CPM provided email detailing additional info in red-line format 6/30/26: WSP emailed CPM the red-line version. 7/9/26: CPM requested additional information 7/14/26: WSP submitted final plan to CPM 7/15/26: CPM email approval
BIO-17(b)	Conduct at least TWO pre-construction nesting bird surveys separated by a minimum 10-day internal during the breeding season for local and migratory birds (). One of the surveys must be conducted within 3 day period preceding initiation of site mobilization, brush clearing, ground disturbance, or construction activity Upon discovery of an active nest the default buffer identified in the NBMP shall be applied.	Conduct the pre-construction nesting bird surveys.	Jan 1-Aug 31 for raptors and Mar 1-Aug 31 other species	WSP	Complete	Complete	Complete	Complete	
BIO-17(c)	Prepare the pre-construction survey reports.	Submit the pre-construction nesting bird survey reports to the CPM and CDFW	No more than 30 days after each survey effort has been completed.	WSP	Interim report 8/14/26		Final report will go in by 8/31/26	8/17/2026	8/14/26: WSP emailed Technical Memo documenting findings of pre-construction bio surveys 8/17/26: CEC table shows conditional approval 8/24/2026: Nesting Bird Survey Report Submitted 8/28/26: CPM provided comments on Report 9/1/2026: Revised report submitted 9/1/2026: Revised report approved by the CPM

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BIO-19(a)	Prepare a Burrowing Owl Mortality Reduction and Replacement Plan	Submit the plan for review and approval to the CPM, and to CDFW for review and comment	At least 30 days prior to initiation of site mobilization	WSP	Complete	Complete	6/30/2026	7/16/2026	6/30/26: WSP emailed plan to CPM 7/8/26: CPM emailed comments 7/14/26: WSP emailed final plan to CPM 7/16/26: CPM emailed additional comments 7/16/26: WSP emailed revised final plan 7/16/26: CPM email approval
BIO-19(b)	Conduct pre-construction nesting surveys for burrowing owls.	The DB shall provide the pre-construction survey results to the CPM.	Within 14 days of the completion of the survey	WSP	Complete	Complete	8/6/2026	8/13/2026	8/6/26: WSP transmitted survey report to CPM 8/13/26: CPM email approval
BIO-19(c)	If surveys detect burrowing owls within 1,600 feet of proposed construction activities, install non-disturbance buffer fencing..	The Designated Biologist shall provide to the CPM documentation indicating that the fencing has been installed.	No less than 10 days prior to the start of any project-related site disturbance activities	WSP	Complete	Complete	5/1/2026	6/10/2026	5/1/26: BUOW observation notice provided to CPM. 6/9/26: Observation Notice Follow-up sent to CPM from WSP. 6/10/26: CPM approval of memo and buffer reduction to 50 feet. 8/13/26: CPM email approval of survey report 8/14/26: WSP email notifying CEC of two potential BUOW burrows
BIO-19(d)	Provide a Keyhole Markup Language (KMZ) map and GIS shapefiles to the CPM of all burrowing owl burrows found during the surveys conducted during the surveys	The Designated Biologist shall provide the required information.	Within 14 days of the completion of the survey	WSP	Complete	Complete	8/7/2026	8/13/2026	8/7/26: WSP transmitted Shape files to CPM 8/13/26: CPM email approval of survey report
BIO-20(a)	Conduct protocol surveys for Swainson's hawks and avoid all occupied nests	Provide the resumes of proposed Swainson's hawks surveyors to the CPM for approval and the CDFW and USFWS for concurrence prior to conducting surveys	45 days prior to conducting surveys	WSP	Complete	Complete	7/31/2026	8/4/2026	7/31/26: WSP submitted survey report to CPM 8/3/26: CEC email approval with request to show start/end times on daily surveys and show on a map if multiple species of birds use stick nests using a symbol system.

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BIO-21(a)	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 survey reports to the CPM and CDFW	Prior to any site mobilization	WSP	Complete	Not yet applicable	8/6/2026	8/17/2026	8/6/26 WSP emailed survey report to CPM 8/17/26: CEC table shows not yet applicable due to timing
BIO-22	Conduct pre-construction surveys for American badger, desert kit fox, and ringtail shall be conducted within a 500-foot radius of all project disturbance areas and where legal access is granted.	Submit the pre-construction survey reports to the CPM and CDFW	No more than 30 days after each survey effort has been completed.	WSP	Interim report 8/14/26	Surveys complete	With CEC for approval	8/17/2026	8/14/26: WSP emailed Technical Memo documenting findings of pre-construction bio surveys 8/17/26: CEC table shows received and complete
BIO-23(a)	Prepare pre-construction survey protocol for Mohave Ground Squirrel	Submit survey protocol to the CPM for review and approval and the CDFW for review and comment.	No less than 45 days prior to conducting the surveys	WSP	Complete	Complete	3/9/2026	4/16/26	3/19/26: Email from CPM requesting modifications to plan. 4/6/26: Resubmitted to CPM 4/16/26 CPM email approval
BIO-23(b)	Prepare the Mohave Ground Squirrel pre-construction survey report	Submit protocol surveys and submit written reports to CPM and CDFW	No more than 21 days after the survey effort is completed	WSP	Complete	Complete	7/20/2026	7/31/2026	7/20/26: WSP submitted survey report to CPM 7/31/26: CEC email approval

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BIO-24(a)	Provide a copy of the Streambed Impact Minimization and Compensation Measures and WDR to contractors, subcontractors, and project supervisors.		Prior to site mobilization	WSP	8/10/2026	In progress			8/7/2026: WSP provided updated State Waters Jurisdictional Report 8/10/2026: CEC Provided comments 8/17/26: CEC table shows conditional approval 8/27/26: WSP submitted revised Updated Jurisdictional and Non-jurisdictional Waters report 9/8/26: Email from CPM received stating that the jurisdictional waters report is approved but provided comments re: Drainage 73. 9/25/26: WSP emailed responses to CEC comments 9/25/26: CEC and CDFG provided comments 9/28/2026: WSP submitted responses to CEC comments 9/29/26: Email from CPM approving submittal

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BIO-24(b)	Prepare a Stream Diversion Plan	Provide to CPM for review and approval and CDFW for review and comment.	Timeframe not provided in Condition	WSP	8/10/2026				8/7/2026: WSP provided updated State Waters Jurisdictional Report 8/10/2026: CEC Provided comments 8/17/26: CEC table shows conditional approval 8/27/26: WSP submitted revised Updated Jurisdictional and Non-jurisdictional Waters report 9/8/26: Email from CPM received stating that the jurisdictional waters report is approved but provided comments re: Drainage 73. 9/25/26: WSP emailed responses to CEC comments 9/25/26: CEC and CDFG provided comments 9/28/2026: WSP submitted responses to CEC comments 9/29/26: Email from CPM approving submittals
BIO-24(c)	Updated Jurisdictional Waters Report, the proposed engineering drawings for each crossing, and the hydrologic studies used to inform the designs.	Provide to the CPM for review and approval	No less than 45 days prior to site mobilization.	WSP	8/10/2026	With CPM for approval			8/7/26: WSP emailed Updated JD Report to CPM 8/10/26: CPM provided comments 8/13/26: WSP provided responses to CPM comments 8/17/26: CEC table shows received and complete 9/8/26: Email from CPM received stating that the jurisdictional waters report is approved but provided comments re: Drainage 73.

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CIVIL-1(a)	Prepare a drainage structure design and grading plan	Submit required plan to 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		With DCBO and CEC for review	4/21/2026		4/21/26: Hatch submitted partial spec pkg to DCBO 6/26/26: Hatch submitted spec package to DCBO 7/6/26: DCBO provided comments 8/5/26: Hatch provided Stormwater Management Design Report to DCBO 8/7/26: WSP emailed Stormwater Management Design Report to CPM 8/12/26: DCBO provided comments on SW Mgmt Design Report 8/17/26: DCBO approval of grading plan
CIVIL-1(b)	Prepare a erosion & sedimentation control plan	Submit required plan to 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	WSP	8/14/2026	In progress			7/16/26 Strachan Consulting emailed preliminary stormwater management report and drainage layout drawing to CPM in compliance with Water-1. 8/14/26: Comments received from DCBO SEE DCBO DAILY SUBMITTAL LOG FOR STATUS
CIVIL-1(c)	Provide calcs and specs signed by Civil Engineer	Provide required plan to 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	8/5/2026	With DCBO and CEC for review	8/7/2026		8/7/26: WSP emailed Stormwater Management Design Report to CPM SEE DCBO DAILY SUBMITTAL LOG FOR STATUS

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CIVIL-1(d)	Provide soils, geotech, and foundation investigation reports required by 2025 CBC.	Submit required reports to 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	Complete	Complete	Complete		7/21/26: Strachan Consulting sent email to NV5 requesting confirmation that GEO-1 report by Yeh & Associates satisfies this condition.
COM-1	Confirmation of unrestricted access to CPM, CEC staff and delegate agencies for consultants.	Provide confirmation to CPM.	Complete	Hydrostor	Complete	Complete	7/16/2026	7/21/2026	7/17/26: Noah Eckert email to CPM and DCBO confirming commitment to abide by requirements of COM-1 7/21/26: B. Fooks and CPM provided email acceptance.
COM-3	Compliance Verification Submittals	Follow submittal protocol set forth in Condition	Ongoing	Strachan	Ongoing		Ongoing		
COM-4	Site mobilization and construction activities shall not start until the following have occurred: 1) the project owner has submitted the pre-construction matrix and all compliance verifications pertaining to pre-construction Conditions of Certification; and 2) the NTP to the project owner.	Submit the PC compliance matrix and required PC submittals	With first PC compliance submittal or provide at first pre-construction meeting with CEC	Strachan	Ongoing		In progress		8/13/26 Request for LNTP #2 submitted to CPM 8/19/26: LNTP#2 received from CEC
COM-5	Prepare a Compliance Matrix that meets the specifications listed in the condition	Submit a compliance matrix with each MCR.	Monthly	Strachan	Monthly in MCR		Monthly in MCR	Complete	Updated matrix is included in each MCR.
COM-6	Prepare a Monthly Compliance Report	Submit to the CPM	Monthly	Strachan	Due by 10th of each month		8/10/2026	Complete	7/10/26: MCR#6 submitted to CPM
COM-7	Conduct a compliance kickoff meeting with Kern County Planning and Natural Resources, Fire Department, and Public Works	Submit to the CPM	Held 3/2/26 and ongoing	Hydrostor	Complete	Complete	6/26/2026	Complete	6/26/26: Strachan Consulting emailed verification to CPM
COM-13	Prepare an Emergency Response Site Contingency Plan	Submit the plan to the CPM for review and approval	No less than 60 days prior to the start of construction	WSP	Complete	Complete	6/2/2026	8/7/2026	6/2/26: WSP emailed plan to CPM 6/22/26: CPM comments rec'd 8/5/26: WSP emailed revised plan to CPM. 8/7/26: CPM email approval

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

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CUL/TRI-1(a)	Assign a Cultural Resources Specialist (CRS) to the project. No ground disturbances shall occur prior to CPM approval of the CRS and alternates unless such activities are specifically approved by the CPM.	Submit the qualifications for the CRS and Alternative CRS to the CPM	At least 45 days prior to start of ground disturbance associated with site mobilization & construction	WSP	Complete	Complete	2/27/2026 4/22/2026	5/4/2026 for Arp and Schroeder	3/18/26: CPM provided email asking for further information on qualifications of CRS 4/22/26: Resubmitted to CPM 5/4/26: CPM email approval
CUL/TRI-1(b)	Assign Cultural Resource Monitors (CRMs) to the project.	Provide proof of qualifications to the CPM.	At least 20 days prior to site mobilization	WSP	Complete	Complete	2/27/2026 4/22/2026	5/4/2026 for Singer	3/18/26: CPM provided email asking for further information on qualifications of CRS 4/22/26: Resubmitted to CPM 5/4/26: CPM email approval of CRMs 8/17/26:
CUL/TRI-1(b)	Assign Cultural Resource Monitors (CRMs) to the project.	Provide proof of qualifications to the CPM.	At least 20 days prior to site mobilization			With CEC for approval	7/22/2026		7/22/26: WSP emailed CEC Staff additional info supporting Technical Specialists qualifications 7/22/23: WSP submitted resume of Michelle Courtney as alternate CRM for CPM review and approval 7/29/26: CPM requested additional information on Michelle Courtney's quals 7/31/26: WSP provided reference info for Kate Umlauf to CPM 8/11/26: WSP submitted Michelle Courtney's updated resume.
CUL/TRI-1(c)	Assign Native American Monitors from the tribes specified in the CoC.	Submit a copy of the request and a copy of a response letter to the group notifying them that Native American Monitors have been employed and identifying the Native American Monitors.	Within 15 days of receiving tribal request	WSP	Complete	Complete	7/6/2026	7/13/2026	This item is satisfied by the CUL/TRI-5 submittal made to the CPM on July 6, 2026 7/13/26: B. Fooks email indicates Condition is approved

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CUL/TRI-1(e)	Assign Cultural Resource Technical Specialists to the project	Submit resumes to the CPM for approval.	At least 20 days prior to site mobilization	WSP	Complete	Complete	6/30/2026	7/13/2026	6/30/26: Strachan Consulting submitted resumes to CPM 7/13/26: B. Fooks email indicates Condition is approved
CUL/TRI-1(f)	The Project Owner will confirm in writing that the approved CRS will be available for onsite work and is prepared to implement the cultural resources conditions.	Submit letter to the CPM	At least 10 days prior to the start of construction-related ground disturbance	Hydrostor	Complete	Complete	6/29/2026	7/13/2026	6/29/26: Strachan Consulting submitted resumes to CPM 7/13/26: B. Fooks email indicates Condition is approved
CUL/TRI-2(a)	Provide the CRS with copies of the AFC, data responses, confidential cultural resources reports, all supplements, the cultural and tribal cultural resources section from the CEC's FSA, and the CoCs from Final Decision, as well as maps and drawings of the project site and ancillary facilities.	Provide notice to the CPM that the required documents have been provided to the CRS. The CPM will review submittals in consultation with the CRS and approve maps and drawings suitable for cultural resources planning activities.	At least 15 days prior to the start of ground disturbance	WSP and Hatch	Complete	Complete	7/9/2026	7/13/2026	7/9/26: Strachan Consulting submitted Owner's letter to CPM 7/13/26: B. Fooks email indicates Condition is approved

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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		WSP working on final document	7/10/2026		7/10/26: WSP emailed CTRMMP to CPM 7/21/26: WSP/CEC Staff held working session 7/22/26: Strachan Consulting distributed comments from working session 7/23/26: CPM provided Staff's Tech Memo addressing changes that need to be made. 8/11/26: WSP/CEC call set for today 8/13/26: Prescribted Treatment Letter filed under confidentialty 8/15/26: CRS email CTRMMP Rev.1to CEC cultural staff 8/17/25: CPM emailed memo regarding CTRMMP requirements under LNTP#2 9/3/2026: CEC provided comments on CTRMMP 9/22/26: CRS emails CTRMMP Rev. 2 to CEC cultural staff and CPM 9/25/25: CPM emailed comments on CTRMMP Rev. 2 9/29/26: CRS emailed CTRMMP Rev. 3 to CEC 9/30/26: Email from CPM approving plan with contingencies. (See 9/30 memo)
CUL/TRI-3(b)	Submit a letter to the CPM that the project owner agrees to pay curation fees.	Submit letter to CPM	At least 30 days prior to the start of ground disturbance	Hydrostor	Complete	Complete	2/27/2026	3/18/2026	3/18/26: CPM email confirmed receipt of Project Owner's letter as partial approval of this condition..

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CUL/TRI-4(a)	Prepare a Cultural Resources WEAP	The CRS shall provide the draft text and/or training video for the cultural and tribal cultural resources WEAP, including Native American participation, and graphics and the informational brochure to the CPM for review and approval.	At least 30 days prior to the start of ground disturbance	WSP	Complete	Complete	5/29/2026	7/15/2026	5/29/26 WSP emailed to CPM without hardhat sticker 6/3/26: WEAP sticker emailed to CPM 6/22/26: CPM provided comments 7/2/26: WSP emailed update to CPM 7/8/26: Received comments from CPM 7/10/26: WSP emailed WEAP (redline, light, Spanish version, wallet card, Tribal documentation) to CPM 7/14/26: Received comments from CPM 7/15/25: WSP emailed revised version to CPM 7/15/26 CPM email approval
CUL/TRI-4(b)	Provide a WEAP Training Acknowledgement form for each WEAP-trained worker to sign. This will be provided by the CPM to the Project Owner.	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 15 days prior to ground disturbance and at least 10 days prior to each WEAP training offered	CPM	Complete	Complete	6/3/2026	6/3/2026	6/3/26: WEAP Training form received from CPM
CUL/TRI-5(a)	The project owner shall ensure that a CRS, alternative 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.	The Project Owner shall notify the CPM and all interested California Native American tribes of the date on which ground disturbance will begin. The CPM will provide the CRS an electronic form to be used as a daily monitoring log and info.	At least 30 days prior to the start of ground disturbance	WSP	Complete	Complete	7/6/2026	7/13/2026	7/6/26: WSP emailed Tribal notifications to the CPM 7/13/26: B. Fooks email indicates Condition is approved
CUL/TRI-6	The project owner shall provide the CPM and CRS with a letter confirming that the CRS, Alternate CRS, CRMs, and Native American Monitors have the authority to halt ground disturbance in the vicinity of a cultural or tribal cultural resource discovery.	Submit the required letter to the CPM and CRS.	At least 30 days prior to the start of ground disturbance	WSP	Complete	Complete	2/27/2026	3/18/2026	3/18/26: CPM email confirmed receipt of Project Owner's letter 7/13/26: B. Fooks email indicates Condition is approved

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CUL/TRI-8	Conduct cultural surveys of any areas that were unable to be surveyed or sites that were not formally evaluated.	Notify the CPM of any additional surveys	Within 30 days	WSP	Complete	Complete		7/16/2026	Additional survey info provided under Confidential cover by Jeff Harris 7/16/26: CEC email approval
GEN-2 EARLY WORKS	Furnish the CPM and the DCBO with a schedule of facility design submittals and master drawings and master specifications list, including a list of proposed submittal packages of designs, calcs, and specs for major structures, systems, and equipment.	Submit required schedule, master drawings and master specifications list of documents to CPM and DCBO. Provide schedule updates in the MCR.	At least 60 days prior to start of EW rough grading for the EW packages	Hatch and CMT	Complete	Complete	6/20/2026	7/1/2026	6/30/26: Strachan Consulting emailed Master Drawing & Spec Submittal List and Schedule to CPM and DCBO 7/1/26: DCBO approval.
GEN-3	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. If the CEC delegates the DCBO function to an independent third party or local agency,1 the project owner, at the CEC's direction, shall make payments directly to the DCBO based upon a fee schedule negotiated between the CEC and the DCBO.	The project owner shall send a copy of the DCBO's receipt of payment to the CPM.	Monthly (in the next MCR)	Hydrostor	Complete	Complete	Complete	5/7/2026	Approval received via DCBO Weekly Status Report to HDS Project Management Team
GEN-4(a)	Assign a California-registered architect, or a structural or civil engineer, as the **resident engineer** in charge of the project.	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.	At least 30 days prior to the start of LW rough grading	Hatch	Complete	Complete	7/13/2026	7/16/2026	7/13/26: Strachan Consulting submitted Evan Hsaio's resume for this role 7/16/26: DCBO approved Evan Hsaio as Resident Engineer
GEN-5(a)	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.	Submit to the DCBO for review and approval, resumes and registration numbers of the responsible engineers.	At least 30 days prior to the start of LW rough grading	Hatch/CMT	Complete	Complete	6/9/2026	7/16/2026	7/13/26: S. Strachan submitted resume of Evan Hsaio for civil engineer, 7/16/26: DCBO approved Mr. Hsaio as Civil Engr.

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GEN-5(b)	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.	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	At least 30 days prior to the start of LW construction	Hatch/CMT	7/25/2026	Complete	6/9/2026	7/16/2026	6/9/26: Strachan Consulting submitted resume of Evan Hsaio to CPM and DCBO for Design Engineer. 6/10/26: DCBO approved Mr. Hsaio as the Design Engineer
GEN-5(c)	Obtain the DCBO's approval of the assigned mechanical, electric, structural and remaining civil engineers.	Notify the CPM of the DCBO's approvals of the responsible engineers.	Within 5 days of DCBO approval	Hatch/CMT	8/1/2026				8/4/26 DCBO approved electrical, mechanical, and geotech.
GEO-1	If the DCBO determines that investigative conditions exist, the project owner shall perform geotechnical investigations for the areas set forth in the CoC and prepare a written geotechnical report.	Submit the geotechnical report to the DCBO for review and approval. Provide the CPM with copies of the investigations and geohazards report and any comments by the DCBO.	At least 60 days before grading	WSP	Complete	Complete	5/5/2026	7/31/2026	5/7/26: DCBO provided comments 6/24/26: Final Geotech Report submitted to DCBO 6/24/26: WSP submitted final plan to CPM and DCBO 7/9/26: DCBO provided comments 7/24/26: Revised plan sent to DCBO 7/28/26: WSP submitted revised plan to CPM 7/31/26: DCBO approval received
HAZ-1(a)	Prepare a Construction Hazardous Materials Business Plan.	Submit the documents to the CPM for review and approval and to the KCPHSD - Hazardous Materials Division for review and comment. Also provide a copy of transmittal letter to KCPHSD- Hazardous Materials Division to the CPM.	At least 60 days prior to the start of construction	WSP	Complete	Complete	6/22/2026	7/14/2026	6/22/26: Hydrostor uploaded plan to CERS 6/24/26 Strachan Consulting emailed to CPM and DCBO 7/7/26: Strachan Consulting submitted plan to County Fire 7/14/26: CPM email approval

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HAZ-1(b)	Prepare a Spill Prevention Control and Countermeasure Plan.	Provide copies of any comment letters received from the KCPHSD-Hazardous Materials Division along with any changes to the plans for CPM review and approval	At least 60 days prior to the start of construction	WSP	Complete	Complete	Signature page being added this week	7/2/2026 Conditional Approval	6/30/26: WSP emailed the plan to the CPM and DCBO 6/30/36: Hydrostor emailed the Plan to KCPHSD 7/2/26 CPM **conditional approval** with requirement that physical hard copy of SPCC be maintained at site construction office and includes the PE signature on page vii of the document. 8/7/26: Signed page added to SPPC
HAZ-4	Prepare a site-specific Construction Site Security Plan	Notify the CPM that the plan is available for review and approval.	At least 30 days prior to the start of construction	WSP	Complete	Complete	5/21/2026	5/23/2026	5/23/26 CPM approved plan 6/4/26: Strachan Consulting provided hard copy plan to DCBO
HAZ-6(a)	Prepare a Soils Management Plan	Submit the SMP to the CPM for review and approval.	At least 45 days prior to ground disturbance	WSP	Complete	Complete	5/26/2026	7/31/2026	5/26/26 Strachan Consulting emailed to Kern Co. Public Health Services. 6/18/26: Follow-up email sent to Kern County 7/15/16: Strachan Consulting provided email to CPM re SMP not required by KC
HAZ-6(b)	Prepare a Soils Management Plan	Submit the SMP to the Kern County Public Health Services Dept. for review and comment.	At least 45 days prior to ground disturbance	WSP	6/5/2026	by 5/8/2026	5/27/2026	7/31/2026	5/26/26 Strachan Consulting emailed to Kern Co. Public Health Services. 6/18/26: Follow-up email sent to Kern County 7/15/16: Strachan Consulting provided email to CPM re SMP not required by KC 7/26/26: CPM provided comments 7/30/26: WSP emailed revised plan to CPM 7/31/26: CPM email approval

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HAZ-7	Provide the resume of qualified environmental professional with experience in remedial investigation and feasibility studies who shall be available for consultation during site characterization, demolition, excavation, and grading activities.	Submit the resume to the CPM for review and approval.	At least 30 days prior to the start of site mobilization	WSP	Complete	Complete	7/6/2026	7/15/2026	7/6/26: WSP submitted to CPM 7/14/26: WSP retransmitted to CPM 7/15/26: CPM email approval
LAND-1	Prior to the commencement of construction, the project owner shall obtain any necessary permits from the Kern County Planning and Natural Resources Department, or other relevant departments, for development of temporary laydown and parking areas referred to as Villa Haines (VH). The project owner shall pay Kern County fees for review and comment and demonstrate compliance with requirements for development of the laydown and parking areas referred to as P1, P2 N, and P2 S.	Provide the CPM the required approved permits for the temporary laydown and parking areas and provide documentation showing payment to Kern County for fees for review.	At least 30 days prior to development of any temporary laydown and parking areas	Hydrostor	7/25/2026	With CEC for approval	8/14/2026	8/17/2026	6/29/26: Common Sense provided to Kern Co Planning and Natural Resources Dept. 8/5/26: Commens Sense provided response to comments to Kern Co. Planning 8/13/26: Strachan Consulting transmittal to CPM with Record of Compliance approved by Kern County; (no payment of fees required). 8/17/26: CEC email approval

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LAND-2(a)	Develop a construction site plan for early works activities	Submit to the Kern County Planning and Natural Resources Department for review and comment and to the CPM for review and approval.	At least 60 days prior to any grading or development for Early Works permanent project facilities	Hatch/ Hydrostor	Complete	With CEC for approval	6/16/2026	8/17/2026	6/16/26: Emailed to CPM by Strachan Consulting 6/19/26: Submittal provided to Esther Villa with Kern Co Planning & Natural Resources Dept. 7/30/26: CPM provided comments and request for additional information 8/3/26: Comments received from KC 8/11/26: Strachan Consulting submitted revised construction site plan and operations site plan (w/o architectural berm) to CEC 8/13/2026: Kern County approval received 8/13/2026: Strachan Consulting emailed Kern County approval to CPM 8/17/26: CPM email approval
LAND-2(b)	Provide any review comments from Kern Co. to the CPM	Submit Kern County's comments to the CPM	At least 30 days prior to prior to any grading or development for permanent project facilities	Hatch	Complete	Comments submitted to CEC 8/7/2026	8/7/2026	8/17/2026	8/7/26: Strachan Consulting provided KC comments to CPM 8/13/26: Strachan Consulting provided County approval of Land-2 ROC with Construction and Operations site plans 8/17/26: CPM email approval
NOISE-1	Notify residences within one mile of the project site by mail, or by other effective means, of the commencement of project construction. At the same time, the project owner shall establish a telephone number for use by the public to report any undesirable noise conditions associated with the construction of the project. Telephone # to be posted at construction site.	Transmit to the CPM a statement, signed by the project owner's project manager, stating that the notification has been performed, and describing the method of that notification. The statement must also verify that the phone # has been established, visibly posted at the site and included in the statement.	At least 15 days prior to ground disturbance	Hydrostor	Complete	Complete	7/10/2026	7/13/2026	7/10/26: Strachan Consulting emailed to the CPM 7/13/26: CPM email approval

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NOISE-3	Prepare a Employee Noise Control Program	Submit the plan to the CPM for review and approval	At least 30 days prior to the start of ground disturbance	WSP	Complete	Complete	6/25/2026	6/26/2026	6/25/26: WSP submitted plan to CPM 6/26/26 CPM email approval
NOISE-6	Limit the use of heavy equipment operations and noisy construction work to the hours specified in the Condition. **NOTE**: on 3/18/26: CEC team confirmed HDS request that 24/7 controlled detonation work starting from 100 feet below surface will not cause impacts to noise receptors.	Transmit to the CPM a statement acknowledging that the above restrictions will be observed throughout the construction of the project.	Prior to ground disturbance	Hatch/CMT	Complete	Complete	6/28/2026	8/10/2026	6/28/26: Strachan Consulting emailed letter to CPM 8/10/26: CEC email approval
PAL-1(a)	Provide the resume, qualifications, and contact information of its paleontological resource specialist (PRS)	Submit resume and statement of PRS availability to the CPM for review and approval	At least 60 days prior to the start of ground disturbance	WSP	Complete	Complete	2/27/2026	3/19/2026	3/19/26: CPM email approval 8/11/26: WSP submitted resume of Michelle Courtney as alternative PRS 8/11/26: CPM email approval for Michelle Courtney
PAL-1(b)	PRS to obtain qualified paleontological resource monitors (PRMs)	Provide a letter with resumes naming anticipated PRMs for the project that states the identified PRMs meet the minimum qualifications for paleontological resource monitoring as required by the Condition.	At least 30 days prior to ground disturbance	WSP	Complete	Complete	2/27/2026	3/19/2026	3/19/26: CPM email approval
PAL-2	Provide the PRS and CPM 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.	Submit the documents to the PRS and CPM for review and approval.	At least 30 days prior to the start of ground disturbance	Hatch	Complete	Complete	7/10/2026	7/16/2026	3/5/26 CEC agreed that plans can be submitted sequentially with construction phasing. (See Laurel Lees 3/5/26 meeting summary email). 7/10/26: CEC emailed submittal to CPM and PRS for review & approval 7/10/26: PRS email approval 7/16/25: CPM email approval
PAL-3	The PRS shall prepare a Paleontological Resources Monitoring and Mitigation Plan	Submit the plan to the CPM for review and approval. The PRMMP must be approved prior to any ground disturbance.	At least 30 days prior to ground disturbance	WSP	Complete	Complete	6/30/2026	7/21/2026	6/30/26: WSP submitted to CPM 7/8/26: CPM emailed comments 7/20/26: WSP submitted Rev.1 to CPM 7/21/26: CPM email approval

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PAL-4	The PRS shall prepare a Paleo WEAP	Submit the draft WEAP, including the brochure and sticker, to the CPM for review and comments	At least 3 days prior to ground disturbance	WSP	Complete	Complete	5/29/2026	6/29/2026	5/29/26 WSP emailed to CPM without hardhat sticker 6/3/26: WEAP sticker emailed from Strachan to CPM 6/29/26 CPM emailed approval
PAL-5	The resume and qualifications of the trainer shall be submitted to the CPM for review and approval prior to providing WEAP training..	Submit the resume to the CPM for review and approval.		WSP	Complete	Complete	2/6/2096	7/16/2026	7/16/26: Strachan Consulting submitted confirmation that approved PRS will conduct training 7/16/26: CEC email approval
PUBLIC BENEFITS-1	The Project Owner shall work with the County to determine how the use of sales and use taxes from the construction of the project can be maximized.	Submit a letter to the CPM detailing the agreement with Kern County on the use of sales and taxes from project construction or proof of payment of the equivalent amount of sales and use taxes was paid to Kern County.	At least 30 days prior to the start of construction	Hydrostor	Complete	With CEC for approval	6/25/2026	8/11/2026	6/25/26 Strachan Consulting emailed letter to CPM 7/21/26: Requested confirmation of CPM approval email during 7/21 Teams Meeting 8/11/26: CPM email approval
PUBLIC HEALTH-1	Develop and implement a Valley Fever Management Plan that addresses the specific requirements in the Condition.	Submit the plan to the CPM for review and approval.	At least 30 days prior to the start of ground disturbance	WSP	Complete	Complete	6/24/2026	7/28/2026	6/24/26: WSP emailed plan to CPM 7/28/26 approved by CPM.
SOCIO-1	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.	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.	At least 60 days prior to the start of construction	Hydrostor	Complete	Complete	5/26/2026	6/22/2026	5/26/26: Letter from Noah Eckert to CPM 6/22/26: CPM email approval
SOCIO-2	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.	Provide to the CPM proof of payment to the Mojave Unified School District of the statutory development fees.	At least 30 days prior to the start of construction **of habitable space**	Hydrostor	7/15/2026	Complete	6/24/2026	7/8/2026	6/24/26: Strachan Consulting emailed to CPM Verification Timing Change request to 30 days prior to construction of inhabitable space. 8/5/26: CPM approved verification language timing change.

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SOLID WASTE-1	Prepare a Construction Waste Management Plan for all wastes generated during construction of the facility.	Submit the plan to the CPM for review and approval.	No less than 30 days prior to the start of construction	WSP	Complete	With Anwar for approval as of 7/22/26	6/25/2026	7/23/2026	6/25/26: WSP emailed plan to CPM 7/3/26 Condition approval received--must include Mandatory Commercial Recycling Law (AB341) in Table 1. 7/22/26: WSP emailed revised plan to CPM 7/22/26: CPM email approval
TRANS-1(a)	Prepare a Construction Traffic Management Plan Provide copies of any comment letters received from Kern County, Caltrans, CHP, or any other interested agencies, along with any changes to the CTMP.	Submit the plan to the CPM along with copies of the transmittal letters sent to Kern County, Caltrans, and CHP for review and comment Provide the info to the CPM for review and approval.	At least 60 days prior to the start of construction	WSP	Complete	Revised Plan Rev 1 with CEC for review.	6/24/2026	8/14/2026	6/24/26: WSP emailed plan to CPM 6/26/26: WSP emailed plan to Kern County, Caltrans, and the CHP; copies of letters emailed to CPM 7/8/26: **CPM conditional approval:** permanent project construction will need to be expanded to include location of parking and staging, more details on ways to reduce employee trips- via carpooling, shuttles from hotels, etc., and procedures to restore damage to roadways from construction traffic. 7/22/26: Caltrans provided comments 8/6/26: WSP emailed Rev1 to CPM along with other agencies comments. 8/14/26: CPM email approval

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TRANS-2(a)	The project owner shall provide an irrevocable offer of dedication to Kern County for the Dawn Rd and Sierra Highway roadways, as specified in the Condition.	Provide offer of right-of-way dedication for segments of Dawn Road and Sierra Hwy. adjacent to the project site.	Prior to the start of construction	Hydrostor	Complete	Complete	8/14/2026	8/19/26 Conditional approval	7/6/26: Encroachment permit application sent to Kern Co. Public Works. 7/9/26: Dawn Road Access dwgs and Caltrans ROW dwgs sent to Caltrans asking if encroachment permit is required. 7/24/26: Call with Tori Barron-Yates, Caltrans District 9, Encroachment Permits. Ms. Barron-Yates stated that a Caltrans Encroachment permit is not required. 8/14/26: Strachan Consulting transmitted OTD and Enroachment Permit to CPM 8/19/2026: CPM approved submittal; however, an amendment is required so that Condition language reflects Dawn Road improvements to be done.
TRANS-2(b)	The project owner shall also commence construction of an asphalt concrete paved road approach at the proposed Dawn Road entrance at Sierra Highway, extending 200 feet into the project site.	Obtain encroachment permits from Kern Co. PWD and Caltrans.	Concurrent with site mobilization and grading	Hatch	Complete	Complete	8/14/2026	8/19/26 Conditional approval	8/14/26: Strachan Consulting transmitted OTD and Enroachment Permit to CPM 8/19/2026: CPM approved submittal; however, an amendment is required so that Condition language reflects Dawn Road improvements to be done.
TRANS-2(c)	All proposed on-site access and parking improvement plans for the construction phase will be submitted to Kern County and Caltrans for review and comment and to the CPM for review and approval.	Submit the required plans to Kern County, Caltrans for review and comment and to the CPM as required for review and approval/	Before construction begins	Hatch	Complete	Complete	8/14/2026	8/19/26 Conditional approval	8/14/26: Strachan Consulting transmitted OTD and Enroachment Permit to CPM 8/19/2026: CPM approved submittal; however, an amendment is required so that Condition language reflects Dawn Road improvements to be done.

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

Condition of Certification (sorted alphabetically)	Description (always refer to Appendix A of Final Decision for detailed language)	Verification/Action/Submittal Required by Project Owner	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date To HDS for Review	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
VIS-2	Prepare an outdoor sign or signage plan	Submit to the CPM for approval and to the Director of Planning and Natural Resources Dept for review and comment	30 days prior to installation	WSP	Complete	Complete	7/7/2026	7/9/2026	7/6/26: Strachan Consulting has inquired with Esther Villa if sign is exempt from County Zoning Ordinance sign requirements. 7/7/26: Strachan Consulting emailed design to CPM 7/9/26 KC Planning confirmed sign is exempt from County ordinance 7/9/26: CPM email approval
Lahanton RWQCB WDRs *(p. A.A-5)*	Section E. Requirements for Stormwater Discharges: Stormwater must be managed throughout construction to minimize erosion and the discharge of 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.	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.	Prior to the initiation of any construction related activities	WSP	8/17/2026	Included in DESCP			

Willow Rock Energy Storage Center Pre-Construction Compliance Matrix (Based on CEC Final Decision)

Condition of Certification (sorted alphabetically)	Description (always refer to Appendix A of Final Decision for detailed language)	Verification/Action/Submittal Required by Project Owner	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date To HDS for Review	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
WATER-1	Prepare a Drainage Erosion and Sedimentation Control Plan (DESCP) 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	8/15/2026	In progress	8/14/2026		4/21/26: Hatch submitted partial spec pkg to DCBO 6/26/26: Hatch submitted spec package to DCBO 7/6/26: DCBO provided comments 7/17/2026: Stormwater Management Report submitted to CPM 7/17/2026: CEC comments received 8/7/2026: Updated Stormwater Management Report submitted to CPM 8/11/26 WSP emailed DESCP to CPM 8/12/26 CPM provided comments; DCBO still reviewing 8/13/26: DCBO provided comments 8/18/2026: WSP emailed revised DESCP to CPM addressing CEC 8/12 and DCBO 8/13 comments 8/18/2026: CPM approved DESCP for Early Works.
WATER-2	The project own shall comply with the Waste Discharge Requirements (WDRs) established in Attachment A to the CoC in Final Decision.	Submit to Lahontan RWQCB all necessary info and applicable fees, and submit copies of all application submittals to the CPM.	At least 60 days prior to construction of EW	WSP	Complete	Complete	5/26/2026	7/7/2026	2/20/26: LL email to CPM provided agreement; 6/26/26: Strachan Consulting submitted formally for compliance record. 7/21/26: CPM email confirming receipt of submittal

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Condition of Certification (sorted alphabetically)	Description (always refer to Appendix A of Final Decision for detailed language)	Verification/Action/Submittal Required by Project Owner	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date To HDS for Review	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
WATER-5(a)	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 milestones of the design approval process as set forth in Items 1-6.	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.	As required			With CEC for approval	4/27/2026		4/27/26: Application for Dam Construction Permit, 30% Plan Set, and 30% Design Criteria submitted to DWR-DSOD and copied to CPM
WATER-5(b)	The project owner shall provide evidence of payment to DWR-DSOD of all 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.	Provide evidence of payment to the CPM	within 10 days of payment	Hydrostor	Complete	With CEC for approval	6/10/2026		6/10/26: Proof of payment of fees submitted to CPM.
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.	Ongoing during design and construction	Hydrostor	Complete	With CEC for approval	4/27/2026		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	The project owner shall enter into a water agreement with AVEK. Total water use during the 5-year construction period shall not exceed 1,400 acre-feet (AF). During project construction, the MCR shall include a summary of monthly water use.	The project owner shall submit to the CPM any correspondence with the AVEK concerning construction and operations water supply. This shall include the water agreement with AVEK.	Within 10 days or its mailing or receipt	Hydrostor	Complete	Complete	2/20/2026	6/26/2026	2/20/26: LL email to CPM provided agreement; 6/26/26: Strachan Consulting submitted formally for compliance record.

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Condition of Certification (sorted alphabetically)	Description (always refer to Appendix A of Final Decision for detailed language)	Verification/Action/Submittal Required by Project Owner	Timeframe	Lead Resp. Party	Date Due to CPM Based on Key Milestones	Date To HDS for Review	Actual Date to CPM, CBO or Agency	Date Approved by CPM/ Agency	Notes/Status
WORKER SAFETY-1	1. Construction Personal Protective Equipment Program	Submit the Project Construction & Safety Plan to the CPM for review and approval.	At least 90 days prior to the start of construction	WSP	Complete	Complete	3/25/2026 Rev0 6/9/2026 Rev1 Final	6/29/2026	3/25/26 Submitted by WSP to the CEC. 5/4/26: Comments provided by DCBO 6/9/226: Rev1 Final submitted by WSP to CPM 6/19: Rev1 Final submitted to CBO by Strachan Consulting 6/29/26 DCBO approved
WORKER SAFETY-1	3. Construction Injury & Illness Prevention Program	Submit the Project Construction & Safety Plan to the CPM for review and approval.	At least 90 days prior to the start of construction	WSP	Complete	Complete	4/15/2026 Rev 0 6/9/2026 Rev1 Final	6/29/2026	4/15/26 Submitted by WSP to the CEC. 5/4/26: Comments provided by DCBO 6/9/226: Rev1 Final submitted by WSP to CPM 6/19: Rev1 Final submitted to DCBO by Strachan 6/29/26: DCBO approved
WORKER SAFETY-1	6. Construction Emergency Action 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	Complete	With CEC for approval	4/15/2026 Rev0 6/9/26 Rev1 Final 8/3/26 Rev2 Final		4/15/26 submitted by WSP to Co. Fire; 4/15/26 submitted by WSP to CEC 5/4/26: Comments provided by DCBO 5/5/26: KCFD provides written comments 6/9/26: Rev1Final submitted by WSP to CPM and KCFD 6/29/26: DCBO provided comments 8/3/26: WSP emailed Rev2 to CPM 8/20/26: Email from DCBO says the following must still be addressed: Emergency Contact List (Table 4) – The entry for "Willow Rock Supervisor" is currently listed as "To Be Determined." 8/26/2026: WSP submitted revised EAP. 8/27/26" DCBO approved revised EAP
WORKER SAFETY-1	7. Construction 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	Complete	Complete	4/15/2026	6/23/2026	8/26/2026: WSP submitted revised ERP 8/27/2026: DCBO approved revised ERP

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WORKER SAFETY-1	8. Haz. Material Business Plan	Submit to the KCFD for review and comment, then submit to the CPM for approval.	At least 60 days prior to the start of construction	WSP	Complete	Complete	6/22/2026	7/14/2026	6/22/26: Zack Stanton uploaded plan to CERS 6/24/26: Strachan Consulting submitted to CEC 7/7: Strachan Consulting submitted to Co. Fire 7/14/26: CPM email approval
WORKER SAFETY-1	9. Spill Prevention, Control and Countermeasure Plan	Submit the Project Construction & Safety Plan to the CPM for review and approval.	At least 60 days prior to the start of construction	WSP	Complete	Complete	6/30/2026	7/2/2026	6/30/26 Submitted by Zack Stanton to Co Public Health Services Dept. 6/30/26 Submitted by WSP to the CEC. 7/2/26: CPM approval email: PE signed hard copy be maintained at Construction Office

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WORKER SAFETY-1	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	Complete	With DCBO and CEC for review	4/15/2026	6/2/2026	4/15/26 submitted by WSP to CEC. and KCFD 3/16/26: CPM email approves construction phasing for this condition 5/5/26: KCFD provides written comments 6/22/26: DCBO provided written comments 6/22/26 WSP Submitted Rev. 1 Final Plan to CPM and KCFD 6/22/26: **Conditional approval** received from DCBO -see NV5 memo with 3 topic areas that need to be addressed. 7/8/26: Kern Co. Fire email received saying no further comments. 8/14/26: WSP transmitted Rev2 to CPM and DCBO 8/17/16: DCBO Conditional Approval. The following must be addressed: Radio Channel Specificity Section 8.1 Fire Extinguisher Placement & Risk-Based Sizing High-Risk Zone Mapping Section 6.4.2 Coordination with Related Plans 9/23/2026: Approved by DCBO. Plan still requires updating with maps for fire extinguisher placement, radio channel specificity, and High-risk zone mapping.
WORKER SAFETY-1	Request comments on the Project Construction and Safety Plan from KCFD and KCSO.(note: KCSO review is related to controlled detonations plan and will occur during construction phase of project).	Provide the CPM with a copy of letters requesting comments from KCFD and KCSO.	At least 90 days prior to the start of construction	WSP	Complete	Complete	6/11/2026	Complete	6/11/2026: Strachan Consulting submitted copies of correspondence to CPM
WORKER SAFETY-1	Submit to the CPM any written responses sent to KCFD and KCSO	Provide to the CPM copies of written responses.	Within 30 days of receipt	WSP	Complete	Complete	6/10/2026	Complete	6/10/26: Provided copy of KCFD comments to CPM

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WORKER SAFETY-3	Provide the name and contact info for the Construction Safety Supervisor.	Submit the CSS info to the CPM.	At least 30 days prior to the start of site mobilization	Hatch	Complete	Complete	6/25/2026	7/13/2026	6/25/26 Strachan Consulting emailed information to CPM and copied DCBO 7/13/26: B. Fooks email indicates Condition is approved.
WORKER SAFETY-4	Provide for the services of a Safety Monitor from an independent company not affiliated with the DCBO.	Provide to the CPM proof of the agreement to fund the Safety Monitor services.	At least 60 days prior to the start of construction	Hydrostor	Complete	Complete	Complete	3/16/2026	Approval documented in 5/7/26 DCBO Weekly Status Report to HDS Project Management Team
WORKER SAFETY-6	Prepare and submit a Sampling and Analysis Plan	Submit the plan to the CPM for review and approval.	At least 60 days prior to the start of construction	WSP	Complete	Complete	7/21/2026	8/7/2026	6/24/26: WSP emailed plan to CPM 6/29/26 CPM provided comments 7/21/26: WSP emailed Rev1 to CPM 7/31/26: DCBO issued Conditional Approval 8/7/26: DCBO approval
WORKER SAFETY-7	Develop and implement a Valley Fever Prevention and Response Plan that includes an enhanced Dust Control Plan per AQ-SC3.	Provide the plan to the CPM for review and approval.	At least 60 days prior to the start of site mobilization	WSP	Complete	Complete	3/24/2026 Rev0 6/9/2026 Rev1	6/29/2026	Rev0 to CPM on 3/24/26. 5/4/26: Comments provided by DCBO Status Report of 5/7/2026 6/9/26 Rev1 to CPM 6/19: Rev1 Final submitted to CBO by Strachan Consulting 6/26 and 7/8/26: CPM email approval 6/29/26: DCBO approval
WORKER SAFETY-10	Ensure that a portable AED is on site during construction and implement a program to ensure workers are properly trained in its use	Provide proof that a portable AED is on site with a copy of training and maintenance program for review and approval.	At least 30 days prior to start of site mobilization	Hatch	Complete	Complete	7/10/2026	7/13/2026	7/10/26: Strachan Consulting emailed to the CPM 7/13/26: CPM email approval
WORKER SAFETY-11	Provide all the information required for Items 3, 5, and 7.	Provide to 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 start of construction			With CEC for approval			7/21/26: Strachan Consulting submitted compliance filing to CPM 8/7/26: Strachan Consulting submitted letter from Kern County FD stating no further comments.

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WORKER SAFETY-12	Reach an agreement with KCFD regarding funding to mitigate for direct and cumulative project-related impacts or fund a fully equipped Urban Search & Rescue Unit.	Provide a copy of the agreement to the CPM for review and approval OR documentation that a letter of credit has been provided to KCFD.	At least 30 days prior to start of site mobilization	Hydrostor	Complete	Complete	7/7/2026		7/7/26: Strachan Consulting emailed agreement to CPM with cc: to DCBO and KCFD 7/8/26: CPM granted conditional approval; must provide evidence of quarterly payments to KCFD in MCRs with first payment expected Jan 2027. Must also provide notification to CEC of delivery of USAR unit in next MCR after unit is delivered. 8/3/26: Formal agreement with KFCD provided to CEC

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 – September 2026

Date: 10-08-2026

During September 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	Speed limit signs posted.

AQ-SC3 Measure	Compliance Status	Compliance Actions / Comments
Part 3 - Offsite access road speed limits/signage	☒Compliant ☐ N/A ☐ Corrective Action Required	Speed limit signs posted.
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.
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	Material hauled not on public roadways.
Part 13 - Track-out controls	☒Compliant ☐ N/A ☐ Corrective Action Required	Track out controls installed.
Part 14 - Equipment/truck cleaning	☒Compliant ☐ N/A ☐ Corrective Action Required	Equipment clean & remains onsite.
Part 15 - Roadway cleaning	☐Compliant ☒ N/A ☐ Corrective Action Required	Not currently required. No paved surfaces at 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 September
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	Periodic manual sweeping as needed. No excessive track-out or material accumulation requiring mechanical street sweeping observed.

AQ-SC4

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 Deluge equipment list letter is dated July; however, the equipment list remained unchanged and is also applicable to activities conducted in September. No additional actions were necessary to control diesel emissions.

Attachments

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

October 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 September 2026. The list below includes only construction equipment exceeding 50 hp.

Equipment Description	Greater than 50hp	Fuel
Cat D8 Crawler Dozer	Yes	Diesel
Cat D6T LGP Dozer	Yes	Diesel
Cat 140M3 Motor Grader	Yes	Diesel
Cat 824 Compactor Isco	Yes	Diesel
Cat 623K Scraper Isco	Yes	Diesel
Cat 623K Scraper Isco	Yes	Diesel
Kubota RTV-X1140WL-H	Yes	Diesel
JD 544P Loader	Yes	Diesel
JD 260P Excavator	Yes	Diesel
Cat 12M2 Motor Grader	Yes	Diesel
Cat 824 Compactor	Yes	Diesel
Grademaster 18' Drag	Yes	Diesel
Cat D6T Dozer Isco	Yes	Diesel
Cat 623K Scraper Isco	Yes	Diesel
Cat 374FL Excavator	Yes	Diesel
JD 210GEP Skiploader	Yes	Diesel
Kubota RTV-X1140WL-H	Yes	Diesel
SkyTrak 12K Reachlift	Yes	Diesel
JD 544P Loader	Yes	Diesel
JD 260P Excavator	Yes	Diesel
Cat 12M2 Motor Grader	Yes	Diesel
Broce RK350 Sweeper	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

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

Record Keeping Form

Month: September

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
9/1/26		dust control tree watering	**144,400 gal**
9/2/26		dust control	**129,600 gal**
9/3/26		dust control	**129,600 gal**
9/4/26		dust control	**154,800 gal**
9/8/26		dust control	**126,000 gal**
9/9/26		dust control	**230,400 gal**
9/10/26		dust control	**201,600 gal**
9/11/26		dust control	**169,200 gal**
9/12/26		dust control	**136,800 gal**
9/14/26		dust control tree watering	**238,400 gal**
9/15/26		dust control	**234,000 gal**

Comments:

Record Keeping Form

Month: September

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
9/16/26		dust control tree watering	**291,500 gal**
9/17/26		dust control	**306,000 gal**
9/18/26		dust control	**291,600 gal**
9/19/26		dust control	**187,200 gal**
9/21/26		dust control	**302,400 gal**
9/22/26		dust control	**237,600 gal**
9/23/26		dust control	**291,600 gal**
9/24/26		dust control	**223,200 gal**
9/25/26		dust control	**205,200 gal**
9/28/26		dust control	**219,600 gal**
9/29/26		dust control	**205,200 gal**

Comments:

Record Keeping Form

Month: September

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.

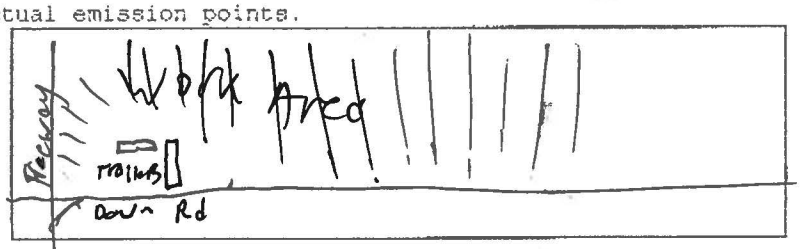
Date	Time	Area Treated	Distance, Area, or Gallons Applied
9/30/26		dust control	**147,600 gal**

Comments:

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location Willow Rock Company Rep. Clyde	Observer Thomas S Affiliation WSP Date 9/1/26
Sky Conditions clear Precipitation —	Wind Direction W-7E Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



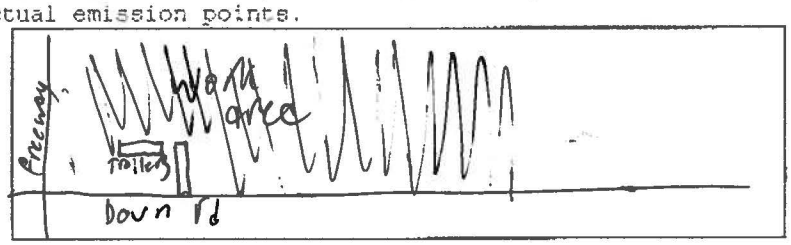
OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0600	—	—
	0800	120:00	—
	1000	120:00	—
Lunch Break 1100–1130	1200	120:00	—
	1400	120:00	—
End Observation	1431		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Cemex Location Willow Rock Company Rep. Clyde	Observer Thomas S Affiliation WSP Date 9-2-26
Sky Conditions Clear Precipitation	Wind Direction W→E Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0600	—	—
	0800	120:00	—
	1000	120:00	—
1 unch Break 1100-1130	1200	90:00	—
	1400	120:00	—
End Observation	1430		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location Willow Rock Company Rep. Clyde	Observer Thomas S Affiliation WSP Date 3-26
Sky Conditions Clear Precipitation	Wind Direction W->E Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.

See Previous Sketches

OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0600	~~00:00~~	—
	0600	120:00	—
	1000	120:00	—
lunch Break -> 1100-1130	1200	120:00	—
	1400	120:00	—
End Observation			
	1430		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location Willow rock Company Rep. Clyde	Observer Thomas S Affiliation WSP Date 9-4-26
Sky Conditions Clear Precipitation	Wind Direction W-E Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.

See previous sketches

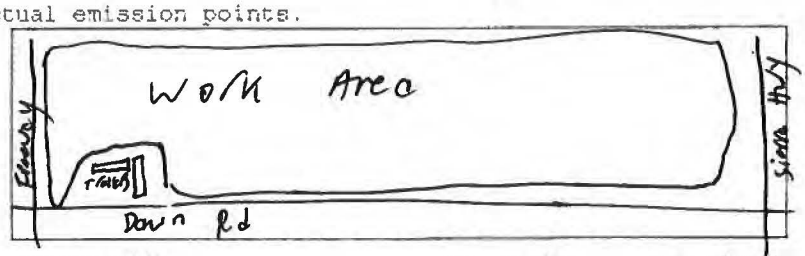
OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0600	—	
	0600	120:00	
Lunch Break 1100-1130 →	1000	120:00	
	1200	120:00	
	1400	120:00	
End Observation	1430		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location Willow Ranch Company Rep. Clyde	Observer Thomas S Affiliation WSP Date 9/8/26
Sky Conditions Clear Precipitation	Wind Direction W→E Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0600	—	—
	0600	120:00	—
	1000	120:00	—
Lunch Break 1100-1130 →	1200	120:00	—
	1400	120:00	—
	1600	120:00	—
End Observation	1615		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location Willow Rock Company Rep. Clyde	Observer Thomas S Affiliation WSP Date 9/9/26
Sky Conditions Clear Precipitation	Wind Direction W→E Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.

See Previous Sketch

OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0600	—	—
	0800	120	—
	1000	120	—
1100-1130 lunch →	1200	120	—
	1400	120	—
	1600	120	—
End Observation	1615		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location Willow Rock Company Rep. Clyde	Observer Thomas S Affiliation WSP Date 9/10/26
Sky Conditions Clear Precipitation	Wind Direction W→E Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.

See Previous Sketches

OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0600	—	—
	0600	120	—
	1000	120	—
	1200	120	—
	1400	120	—
	1600	120	—
End Observation	1615		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location Willow Rock Company Rep. Clyde	Observer Thomas S Affiliation VSP Date 9/11/26
Sky Conditions Clear Precipitation	Wind Direction W→E Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.

See previous sketches

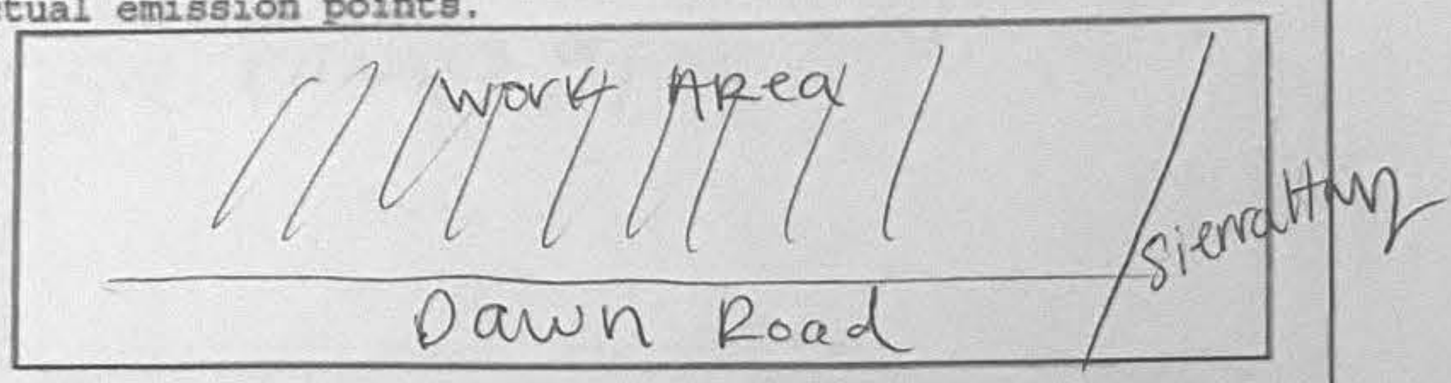
OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0900	—	—
	0800	120	—
	1000	120	—
lunch 1100–1130 →	1200	120	—
	1400	120	—
	1600	120	—
End Observation	1615		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location WRESC Company Rep. Clyde	Observer Alexa B Affiliation WSP Date 9/24/26
Sky Conditions Sunny & Clear Precipitation	Wind Direction Wind Speed 6 MPH
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	06:00		
	08:00	20:00	
	10:00	20:00	
lunch	12:00	20:00	
	14:00	20:00	
	16:00	20:00	
End Observation	17:00		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION OUTDOOR LOCATION	
Company Granite Location NRESC Company Rep. Clyde	Observer Affiliation Date 9/15/20
Sky Conditions Sunny & clear Precipitation	Wind Direction SW Wind Speed 12 MPH
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.

See previous 9/14

OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	06:00		
	08:00	20min	
	10:00	20min	
	12:00	20min	
	14:00	20 min	
	16:00	20 min	
End Observation	17:00		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite WPESC Location Company Rep. Clyde	Observer Alexa B Affiliation WP Date 9/16/20
Sky Conditions No precip. Sunny & Clear Precipitation	Wind Direction SW Wind Speed 11 mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.

see previous 9/15 & 14

OBSERVATIONS

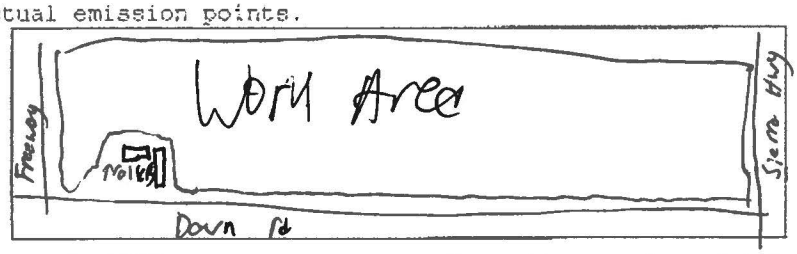
	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	06:00		
	08:00	20:00	
	10:00	20:00	
	12:00	20 min	
	14:00	20:00	
	16:00	20:00	
End Observation	17:00		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location Willow Peak Company Rep.	Observer Thomas S Affiliation WSP Date 9/21/26
Sky Conditions Clear Precipitation	Wind Direction W-7E Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0630	—	—
	0630	120	—
	1030	120	—
1100-1130 lunch	1230	90	—
	1430	120	—
	1630	120	
End Observation	1630		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location Willow Rock Company Rep. Clyde	Observer Thomas S Affiliation WSP Date 9/22/26
Sky Conditions clear Precipitation	Wind Direction Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.

See Previous Sketch

OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0630	—	—
	0830	120	—
	1030	120	—
lunch 1130-1200 →	1230	~~120~~ 90	—
	1430	120	—
	1630	120	—
	1700	30	—
End Observation	1700		

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Granite Location Willow Rock Company Rep. Clyde	Observer Thomas S Affiliation WSP Date 9-23-26
Sky Conditions Clear Precipitation	Wind Direction Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.

See previous sketches

OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	0630	120	—
	0830	120	—
	1030	120	—
Lunch 1130-1200	1230	120	—
	1430	120	—
	1630	120	—
End Observation	1700		

Figure 22-1

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 - September2026
Date:	10-08-2026

1. Introduction

WSP USA Inc. (WSP) has been retained to conduct pre-construction biological surveys and provide 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 September 1 and September 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

The following activities were undertaken between September 1st and 30th, 2026. All activities were undertaken in the southern third of the WRESC site (Phase 1 Early Works Area):

- Subsurface Pads Grading - September 1st to September 30th
- Ditch Excavation/Trenching – September 2nd to September 30th
- Vegetation clearing & grubbing – September 3rd to September 4th
- Stormwater Pond Excavation – September 8th to September 30th
- Permanent Fence Installation - September 8th to September 30th
- Contaminated Soil Clean Up - September 22nd to September 24th
- Installation of Culverts – September 23rd to September 25th

3. Summary of Biological Surveys

No pre-construction biological surveys were conducted between September 1 and September 31.

4. Summary of Biological Monitoring

Biological Monitors were present during excavation, trenching, grading, culvert installation, permanent fence installation, and the removal of contaminated soil. Biological monitors conducted daily sweeps of areas prior to clearing and grubbing activities to document incidental observations of wildlife, including Crotch's bumble bee, reptiles, and small mammals as per CoCs. Non-special status wildlife species encountered and captured 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(s)	Construction Activities	Issues recorded
September 1, 2026	Glen Kinoshita	• Grading • WJT irrigation	Dogs present onsite
September 2, 2026	Glen Kinoshita	• Grading • Trenching	None observed
September 3, 2026	Glen Kinoshita	• Grading • Vegetation clearing • Grubbing	Desert iguana mortality (See Section 4-4)
September 4, 2026	Glen Kinoshita	• Grading • Vegetation clearing • Grubbing • BMPs on contaminated soil	None observed
September 8, 2026	Hector Moreno	• Grading • Mass excavation • Scraping • Fence post installation	None observed
September 9, 2026	Hector Moreno	• Grading • Scraping • Mass excavation • Fence post installation	None observed
September 10, 2026	Hector Moreno	• Grading • Scraping • Mass excavation • Fence post installation	None observed
September 11, 2026	Hector Moreno	• Grading • Scraping • Mass excavation • Fence post installation	None observed
September 12, 2026	N/A	• Grading • Ripping • Mass excavation	None observed
September 14, 2026	Hector Moreno	• Watering of relocated WJTs • Trenching • Mass excavation	None observed
September 15, 2026	Hector Moreno	• Trenching • Clearing and grubbing	Merriam's kangaroo rat and Western patch nosed snake mortalities (See Section 4-4)
September 16, 2026	Hector Moreno	• Mass excavation • Watering of relocated WJTs • Security fence installation • Cut and fill	None observed
September 17, 2026	Hector Moreno	• Mass excavation • Cut and fill • Trenching • Fence installation	Western patch nosed snake

Date	Monitor(s)	Construction Activities	Issues recorded
			mortality (See Section 4-4)
September 18, 2026	Hector Moreno	• Mass excavation • Cut and fill • Trenching • Fence installation	None observed
September 19, 2026	N/A	• Mass excavation • Trenching	None observed
September 21, 2026	Claire Bernd	• Grading • Mass excavation	None observed
September 22, 2026	Claire Bernd	• Grading • Mass excavation • Removal of contaminated soil • Trenching	None observed
September 23, 2026	Claire Bernd	• Grading • Mass excavation • Removal of contaminated soil • Fence installation • Culvert with rip rap installation	None observed
September 24, 2026	Claire Bernd	• Grading • Mass excavation • Removal of contaminated soil • Fence installation • Culvert with rip rap installation	None observed
September 25, 2026	Claire Bernd	• Grading • Mass excavation • Removal of contaminated soil • Fence installation • Culvert with rip rap installation	None observed
September 28, 2026 September 29, 2026 September 30, 2026	Jeremy Paris on standby to support construction activities as needed	No clearing, grubbing, or other new ground-disturbing activities occurred during the week of the 28th. Excavation of the southern portion of the compensating reservoir at a depth of approximately 10 feet below ground survey and subsequent compaction of exposed soils.	None reported

4.1 Avoidance and Minimization Measures Implemented

No avoidance or minimization measures were implemented between September 1 and September 30, 2026.

4.2 Incidental Wildlife Observations

Biological monitors incidentally observed 20 wildlife species between September 1st and September 30th, including eight reptile, eight bird, and 4 mammal species (Table 4-2).

Table 4-2 Summary of Incidental Wildlife Observations

Common name	Scientific name	Status
Common kingsnake	*Lampropeltis californiae*	NA
Side-blotched lizard	*Uta stansburiana*	N/A
Great Basin whiptail	*Aspidoscelis tigris tigris*	N/A
Bell's sparrow	*Artemisiospiza belli*	NA
Cactus wren	*Campylorhynchus brunneicapillus*	NA
Common raven	*Corvus corax*	NA
LeConte's thrasher	*Toxostoma lecontei*	Candidate species
Merriam's kangaroo rat	*Dipodomys merriami*	NA
California ground squirrel	*Otospermophilus beecheyi*	NA
Black-tailed jackrabbit	*Lepus californicus*	NA
White-tailed antelope squirrel	*Ammospermophilus leucurus*	NA
Great Basin gopher snake	*Pituophis catenifer*	N/A
Mojave glossy snake	*Arizona elegans candida*	N/A
Desert iguana	*Dipsosaurus dorsalis*	N/A
Mojave shovel-nosed snake	*Chionactis occipitals*	N/A
Loggerhead shrike	*Lanius ludovicianus*	Bird Species of Special Concern
Red tailed hawk	*Buteo jamaicensis*	N/A
Killdeer	*Charadrius vociferus*	N/A
Swallow sp.	*Hirundinidae*	N/A

Common name	Scientific name	Status
Western patch nosed snake	*Salvadora hexalepis*	N/A

4.3 Wildlife Relocation

A total of 8 animals were relocated from the Phase 1 Early Works Area comprised of two small mammal species, two snake species, and one lizard. Animals incidentally encountered by Biological Monitors were relocated when they could be safely caught. 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*	4
Great Basin whiptail	*Aspidoscelis tigris tigris*	1
California glossy snake	*Arizona elegans candida*	1
Great Basin gopher snake	*Pituophis catenifer*	1
California ground Squirrel	*Otospermophilus beecheyi*	1
Total		**8**

Table 4-3b Wildlife species relocated between September 1st to September 30th

Common name	Scientific Name	Number Relocated	Date of Relocation	Capture Site	Relocation Site
California Glossy Snake	*Arizona elegans candida*	1	09-10-2026	Phase 1 Clearing Area	P2 South
Great Basin gopher Snake	*Pituophis catenifer*	1	09-15-2026	Phase 1 Clearing area	P2 South

Common name	Scientific Name	Number Relocated	Date of Relocation	Capture Site	Relocation Site
Merriam's kangaroo rat	*Dipodomys merriami*	4	09-15-2026	Phase 1 Clearing area	P2 South
California ground squirrel	*Otospermophilus beecheyi*	1	09-15-2026	Phase 1 Clearing area	P2 South
Great Basin Whiptail	*Aspidoscelis tigris tigris*	1	09-15-2026	Phase 1 Clearing area	P2 South

4.4 Wildlife Mortality

Four 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
Desert iguana	Dipsosaurus dorsalis	1	09-03-2026	Collison with bulldozer
Merriam's kangaroo rat	*Dipodomys merriami*	1	09-15-2026	Collison with bulldozer
Mojave shovel-nosed snake	*Chionactis occipitals*	1	09-15-2026	Collison with bulldozer
Western patch nosed snake	*Salvadora hexalepis*	1	09-17-2026	Snake was pinned onto fence.

5. Compliance

No compliance issues were recorded between September 1st and September 30th, 2026 in the Phase 1 Early Works Area.