



Juliet Solar

Exhibit O

Vegetation Management Plan

Case No. 20-1760-EL-BGN

Vegetation Protection and Management Plan

Juliet Solar
Wood County, Ohio

Prepared by:



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Project Introduction

Juliet Energy Project, LLC (“Juliet Solar”) proposes to develop a 101-megawatt (MW) photovoltaic (PV) solar energy project within an approximately 664 acres area of private land, located in Weston and Milton Townships of Wood County, Ohio (“Project”). The proposed project has an approximate footprint of 580 acres (“Project site”). Sand Ridge Road, Milton Road and Weston Road are adjacent to the Project site.

The purpose of this Vegetation Management Plan is to clearly identify areas of proposed vegetation clearing, and the measures taken by Juliet Solar to minimize negative ecological impacts from the removal of vegetation. Juliet Solar has endeavored to protect the woody vegetation near the Project facilities to the greatest extent feasible. Juliet Solar has minimized impacts to wetlands, streams, waterbodies, and drainage features identified through on-site investigation into the site design. At the same time, Juliet Solar plans to add vegetation in and around the Project site to enhance the visual appeal of the Project, provide ecological benefits through native species and provide visual buffers for adjacent residents.

Project Surveys

A preliminary site and environmental permitting evaluation was performed of the Juliet Solar Project site by Environmental Design and Research (“EDR”). This evaluation focused on the identification of possible environmental and permitting constraints associated with the development of the Project. Following that, a wetland and waterbody delineation was conducted by Cardno, Inc. Concurrently, a Preliminary Ecological Assessment was conducted by Cardno, Inc. Both assessments utilized Geographic Information Systems (GIS) and site surveys to screen and classify potential environmental resources at the Project site.

Juliet Solar has ensured to adhere to the Ohio Administrative Code (OAC) for the preparation of this plan. OAC4906-4-08(B)(2) requires an analysis of potential impacts to identified land uses resulting from construction and operation of the Project. Based on available aerial imagery, cultivated crops account for 96.7 percent of the Project site. Developed, open spaces (primarily residential spaces) are the second most prominent land cover, accounting for approximately 3 percent of the acreage. Apart from this, low intensity developed areas and deciduous forest account for less than 1 percent each of the Project site. Table 1 provides a summary of the land cover identified on the Project site.

Type	Area (acres)	Area (%)	Permanent Impact (acres)	Temporary Impact (acres)
Cultivated Crops	641.4	96.7%	15.18	24.58
Developed, Open Space	19.01	2.9%	0.35	0.77
Developed, Low Intensity	2.53	<1%	0.06	0.29
Deciduous Forest	0.67	<1%	0.1	0
Total	663.61	100%	15.69	25.64

Table 1: Summary of land cover identified on the Project site and anticipated acreage of impacts

Vegetation/Tree Clearing

A small portion of the study area exists as deciduous forest and mostly occurs as isolated woodlots between crop areas and along roads. Juliet Solar is committed to minimizing tree clearing and observing seasonal restrictions on tree clearing to protect sensitive bat species (e.g., cutting trees only between

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November and March), where possible. Based on the project design, Juliet Solar has not identified any tree clearing.

Vegetation Protection

Permanent vegetative impacts associated with the Project would be limited to the area surrounding the project footprint. The project footprint is estimated to be approximately 580 acres of the fenced area out of the approximately 664 acres of the total Project site. The permanent impacts would occur primarily within agricultural fields and is limited to 15.7 acres. The remaining 564 acres of the fenced area of the Project will be revegetated and maintained. This includes 504 acres under the PV panels. Protection of vegetation will be achieved by careful site planning, indicating limits of clearing on construction drawings, and clearly staking/flagging those limits in the field prior to the initiation of construction activities. Moreover, the Project's final design will include planting of pollinator-friendly native plantings in selected locations around the perimeter of the solar farm. It is the intent that these features not only enhance the visual appeal of the Project but would also enrich local wildlife habitats and benefit the local farming community. The areas of vegetation to remain are identified are shown on the map in the Appendix.

Specific methods will be utilized for the protection of vegetation in sensitive areas and outside the designated clearing limits. Examples of methods that could be used during construction of the Project include preconstruction documentation of tree and planting condition, protection zone fencing, prohibitions on excavation or heat sources within relevant protection zones and erosion and sedimentation control. Final methods for vegetation management will be included in construction documents. In addition, means of limiting tree removal and protecting remaining vegetation will be reviewed with the contractor at a pre-construction environmental training session and be monitored by an on-site Environmental Monitor throughout the duration of construction.

Timing Constraints

According to the findings of the ecological assessment, Indiana bats and northern long-eared bats are identified to be potentially occurring within the Project site. Should any tree clearing be necessary, Juliet Solar will work to schedule tree clearing activities to avoid any conflict with State implemented timing constraints. Juliet Solar understands the current tree clearing constraints to be:

- ➔ No tree cutting April 1 through September 31 for trees three inches or greater in diameter to avoid impacts to the Indiana bats (state and federal endangered species) and the northern long-eared bat (Federal threatened species).
- ➔ Adhere to Seasonal Tree Cutting from October 1 through March 31.

While the ecological assessment findings do not identify any migratory and protected birds' occurrence in the vicinity of the project site, Juliet Solar will follow directions from ODNR to mitigate impacts to preferred nesting habitats during construction.

Restoration Methods

Project construction will last approximately 9 to 12 months and will generally include clearing and grading; installation of stormwater retention features and laydown yard; access roads and foundation construction; installation of Project equipment (racking posts, racking system, photovoltaic solar modules, inverters, collection systems, substation and generation tie line); and installation fencing. Minimal grading

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and clearing are anticipated. The underground collection system will be installed through open-cut trenching and boring, as well as HDD methods. Activities that may impact vegetation include cutting and clearing of vegetation, removal of stumps and root systems, and increase exposure of soils. However, to minimize adverse environmental impacts, vegetation clearing will be confined to Project site work areas. Trees cleared from the work area will be cut as close to the ground as possible, cut into logs, and either left for the landowner or removed. The associated tree limbs and bush will be buried, chipped, or otherwise disposed of as directed by the landowner and as allowed under federal, state, and local regulations.

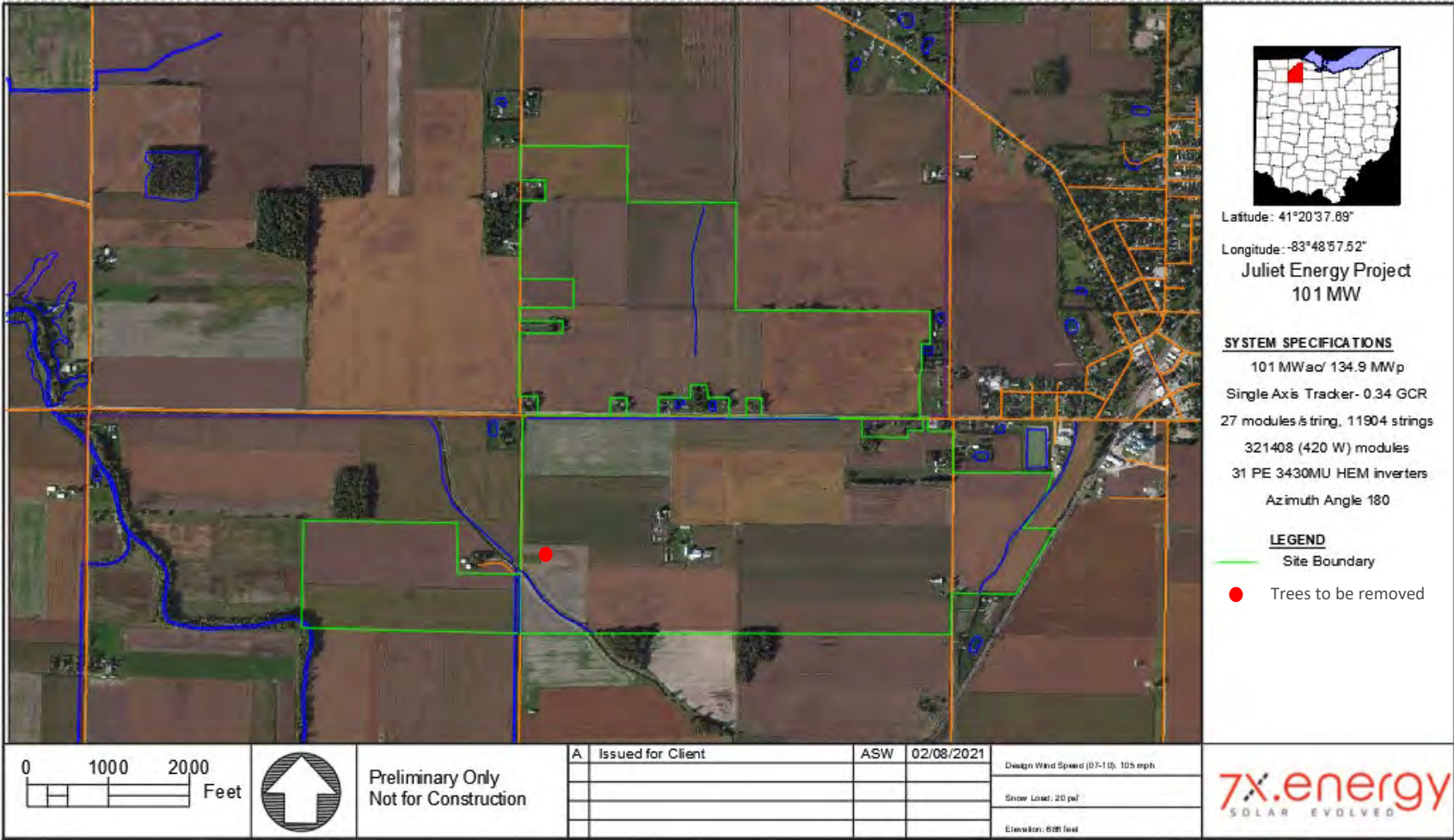
If clearing in forested wetlands is necessary, cleared woody vegetation will be disposed of by using a “drop and lop” method, which involves cutting, dropping, and leaving the material generally where it falls. If large logs are accessible from the wetland edge via a winch, these logs will be dragged out of the wetland on a winch line, as long as excessive damage from dragging/rutting will not occur. This will allow salvaging of timber while avoiding impacts to the wetland that would result from equipment access. Cutting is expected to be performed manually, using chain saws. No attempt will be made to stack timber in wetlands or to remove logs or slash from wetlands, except as previously described. Timber will be dropped, cut up and moved by hand if necessary, so as to minimize interference with surface water flow. If dropping timber appears to present an interference with water flows in a wetland or stream channel, the contractor shall remove the fallen material by hand and relocate it to an appropriate upland portion of the Project site or consult with the Environmental Monitor to determine the most practical way to selectively remove the timber. The stumps and root systems of all cut woody vegetation will be left in place.

Juliet Solar will reestablish the topsoil for areas where grading is necessary. Reseeding will be done with a low-growth, native grass seed mix under the solar array and a pollinator-friendly seed mix in select areas outside of the array along the Project perimeter fence line. Native species that have germinated naturally will be retained. The seeded areas will be uniform, free of ruts, erosion, and/or bare and dead spots. Prior to any area being seeded, Juliet Solar will require seed mix approval. Juliet Solar will perform a visual inspection to ensure that the disturbed soil has been properly reestablished.

During the Project operation phase, Juliet Solar will manage the site vegetation by mowing. Mowing frequency will vary depending on time of year and rainfall. The primary objective of mowing is to keep the vegetation to avoid panel shading. Onsite vegetation will be monitored for the establishment of noxious weeds. If noxious weeds are identified within the Project’s fenceline during operation, herbicide may be used. Herbicide use will be conducted by a licensed professional and will be applied in accordance to manufacturer instructions. Project site vegetation maintenance will be conducted by an experienced contractor with all required certifications to perform the work described above. Regular vegetation maintenance will ensure that the project functions well and has pleasing aesthetics. All required permits for construction and operation of the Project will be acquired prior to construction, and Juliet Solar will abide by all state standards and laws applicable to the Project.

If you have any questions regarding the contents of this plan, please contact Cliff Scher at (866) 298-1632 x116 or JulietSolar@7X.Energy.

Appendix A. Identified Vegetation on Project Site



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