

Exhibit C
Vegetation Management Plan
Stantec

February 25, 2021

To:	Lauren Devine	From:	Courtney Dohoney
	Marion County Solar, LLC		Stantec Consulting Services, Inc.
File:	Marion County Solar Project	Date:	February 25, 2021

Reference: Vegetation Management Plan for the Marion County Solar Project, Marion County, Ohio

Stantec Consulting Services Inc. (Stantec) is pleased to provide this vegetation management plan to Marion County Solar Project, LLC (Marion County Solar) that summarizes conservation measures to be implemented at the Marion County Solar Project in Marion County, Ohio (Project). The purpose of this plan is to ensure the vegetation near Project facilities is protected to the extent possible per Ohio Administrative Code 4906-4-08(B)(2)(b)(v) and that areas temporarily disturbed by construction of the Project are stabilized and vegetation is restored as quickly and effectively as possible to meet applicable Ohio Environmental Protection Agency (OEPA) construction storm water permit requirements for the Project.

PROJECT INTRODUCTION

Marion County Solar proposes to develop a solar energy project on privately owned agricultural land in Marion Township near the City of Marion in Marion County, Ohio. The Project area encompasses approximately 970 acres and it is anticipated that the Project will have a footprint of approximately 724 acres within the Project area. The Project area is depicted in Figure 1 in Attachment A. A Certificate of Environmental Compatibility and Public Need (CECPN) will be needed from the Ohio Power Siting Board (OPSB) in order to construct the Project.

PROJECT SURVEYS AND VEGETATION IMPACTS

Stantec completed field-based wetland and stream delineation surveys within the proposed Project boundary on September 9 through 11, 2020. Four wetlands were delineated within the Project area totaling approximately 3.6 acres and three streams, two perennial and one intermittent, totaling 10,442 linear feet were identified. No drainage features or ponds were identified during the survey. Marion County Solar's site design avoids all identified wetlands and streams during the field survey.

Impacts to wetland vegetation will not occur because direct impacts to wetlands have been avoided. Furthermore, appropriate erosion and sediment control measures (e.g., silt fences, straw bale dikes, or other storm water control measures) will be used to mitigate potential indirect impacts that may occur to these aquatic resources during construction as a result of any on-site erosion and sedimentation. These specific measures will be outlined in more detail in the Stormwater Pollution Prevention Plan (SWPPP) that will be prepared for the Project once final design is complete and an Ohio National Pollutant Discharge Elimination System (NPDES) construction stormwater general permit is obtained for the Project. Marion County Solar will also implement OEPA Guidance on Post-Construction Storm Water Controls for Solar Panel Arrays to

Reference: **Vegetation Management Plan for the Marion County Solar Project, Marion County, Ohio**

further minimize runoff during operation of the Project (OEPA 2019¹).

In addition, Stantec conducted a field-based habitat survey to document vegetative communities within the Project area. The Project area is predominately composed of agricultural land used for row-crop agriculture. At the time of the surveys the fields were planted with soybean (*Glycine max*; 865.7 acres, approximately 89.3% of the Project area). Grassland habitat (41.7 acres, 4.3%), second growth deciduous forest (17.0 acres, 1.8%), old field (15.7 acres, 1.6%), new field (15.7 acres, 1.6%), wetlands (3.6 acres, 0.4%), existing roadway (2.9 acres, 0.3%) and developed residential open space (1.4 acres, 0.1%) comprise the remainder of the Project area. Approximately 724.3 acres of agricultural land will be converted to accommodate the Project facilities. Approximately 9.5 acres of new field areas will also be cleared during construction, primarily to accommodate the photovoltaic (PV) solar modules, the Project substation, switchyard, battery energy storage system (BESS) facility, and operations and maintenance building. Second growth deciduous forest is located within the Project footprint, however all infrastructure has been sited to avoid the approximate 4.6 acre woodlot so no disturbance to this forested habitat will occur. Any other woody debris generated during the pre-construction site clearing and grubbing process would be segregated, stockpiled, and spread on site, if practical, or hauled off site.

PROJECT CONSTRUCTION AND RESTORATION METHODS

Project construction will last approximately 12 months and will generally include clearing and grading; installation of stormwater retention features and laydown yard; access road and foundation construction; installation of Project equipment (racking posts, racking system, PV solar modules, inverters, collection systems, substation, switchyard, BESS, and generation tie line); and installation of fencing. Minimal grading and clearing are anticipated for the Project. The underground collection system will be installed through open-cut trenching and HDD methods.

Permanent stabilization seeding shall be completed immediately following the completion of construction. To the extent possible, Marion County Solar will implement the pollinator habitat recommendations provided by ODNR Division of Wildlife pertaining to the Ohio Pollinator Habitat Initiative. This could include reseeding areas disturbed during construction with a low-growth, native grass seed mix or native prairie grasses for areas under the solar modules and a native species, pollinator-friendly seed mix in select open areas outside of the array and within the Project perimeter fence. Noxious weeds and invasive species will be managed by mechanical means (mowing) and applications of commercially available herbicides in limited quantities, when needed.

The Project is considered to be permanently stabilized when all soil disturbance has occurred and a uniform perennial vegetative cover with a density of 70% has been achieved in all areas of the site not covered by other permanent surfaces. Any seed, straw, and/or matting used within the Project area shall meet Ohio

¹ OEPA 2019. Guidance on Post-Construction Storm Water Controls for Solar Panel Arrays. Accessed June 2020 at: <https://epa.ohio.gov/Portals/35/storm/Guidance%20on%20Post-Construction%20Storm%20Water%20Controls%20for%20Solar%20Panel%20Arrays.pdf?ver=2019-10-22-122431-753>

Reference: **Vegetation Management Plan for the Marion County Solar Project, Marion County, Ohio**

stormwater standards (OEPA 2021²).

Vegetation may be used as a way to mitigate potential viewshed impacts that would result from the Project. Marion County Solar developed a Visual Impact Mitigation Plan as part of the CECPN Application that explains the visual impact analysis that was conducted to determine specific landowner's potential viewshed impacts resulting from the Project. Based on the current design, there are approximately 131 residences within 0.5 miles of the Project. All residences are at least 225 feet from the nearest solar panel. Of the residences that are within 0.5 miles of the Project, Marion County Solar has identified those whose viewshed will be most impacted by the Project and will work with the landowners to mitigate impacts through a Good Neighbor Agreement or vegetative screening. If a landowner determines that vegetative screening is the desired mitigation, an independent landscape architect will be consulted to determine if the proposed vegetative screening will effectively mitigate any viewshed impacts.

PROJECT OPERATION

Site vegetation will be managed on an as-needed basis through mowing during the operational phase of the Project. When feasible, Marion County Solar will limit mowing to late summer and fall in order to allow for late- blooming pollinator species to flower. Marion County Solar will monitor the site to ensure that noxious weeds do not become established within the Project fence line. Targeted applications of herbicide will be used if noxious weeds are identified.

MONITORING AND REPORTING

Following establishment of vegetation, Marion County Solar will confirm restoration areas have been stabilized in accordance with the SWPPP when a minimum 70% vegetative cover density of erosion resistant perennial species has been achieved. Marion County Solar will document that construction areas have been stabilized by conducting a visual inspection of the restoration areas, collecting photographs, and preparing a written report. If trees are planted during Project construction, post-planting maintenance will be conducted in accordance with the supplier's recommendations.

All required permits for construction and operation of the Project will be acquired prior to construction and Marion County Solar will abide by all state standards and laws applicable to the Project.

² OEPA. 2021. *Rainwater and Land Development, Ohio's Standards for Stormwater Management Land Development and Urban Stream Protection. Third Edition*. Columbus, Ohio. Accessed February 2021 at: <https://epa.ohio.gov/dsw/storm/rainwater>.

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If you have any questions regarding the contents of this plan, please contact me at (703) 485-8554 or courtney.dohoney@stantec.com.

Long Day

Attachment: Marion County Solar Project, Project Site Layout Map
Vegetative Buffer Detail Example

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ATTACHMENT A FIGURES

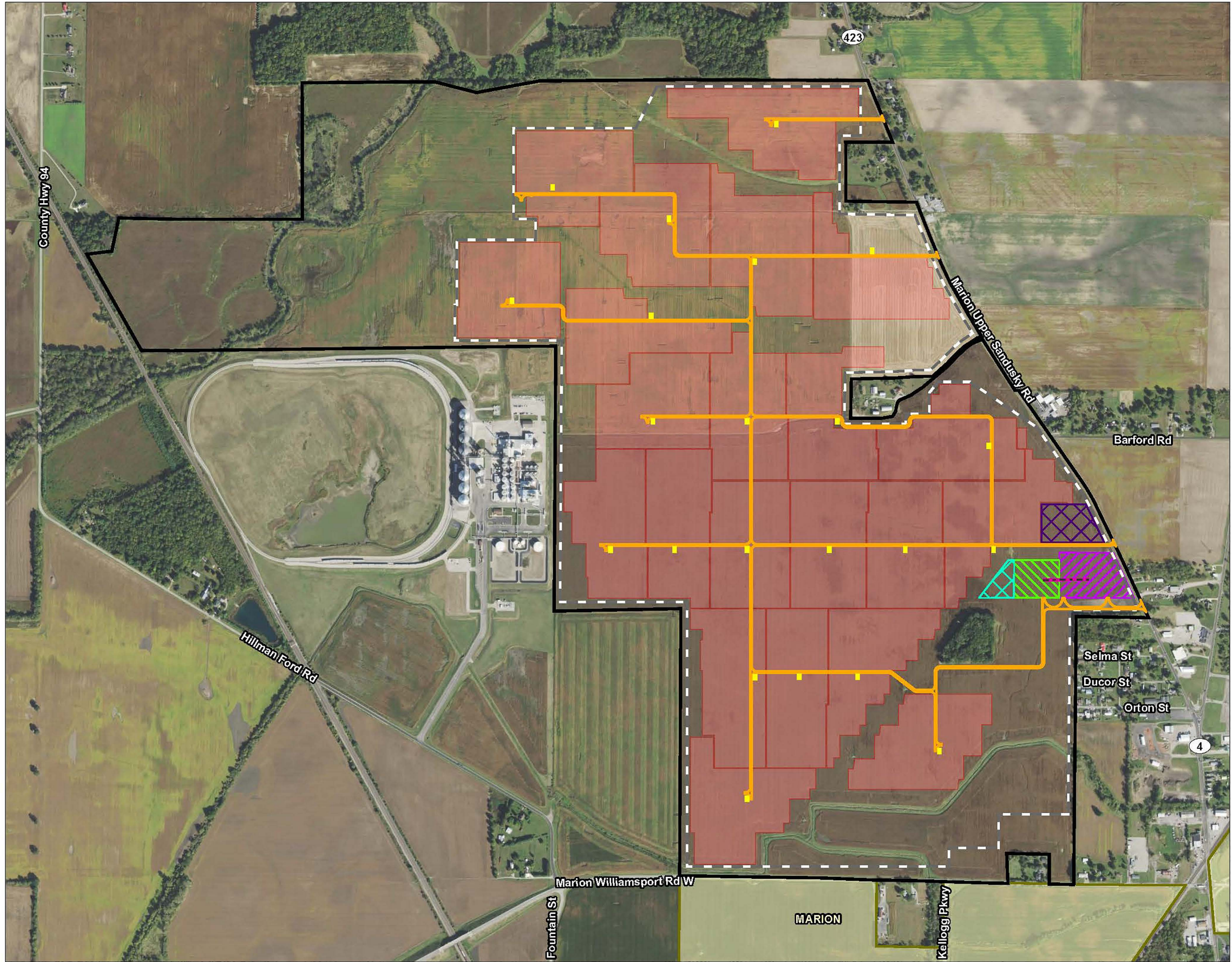
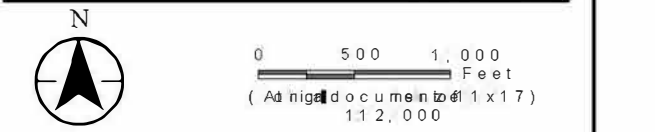
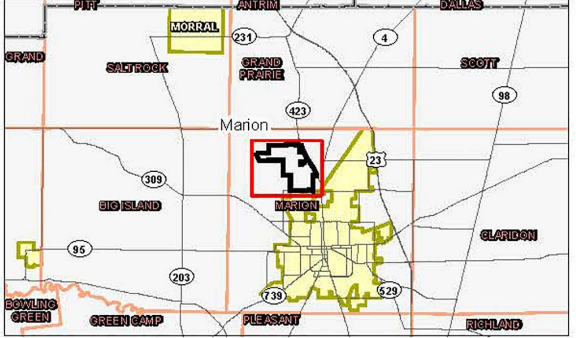


Figure No. **1**
Title **Project LayoMap**
Client/Project **Marion County Solar Project, Marion County, Oklahoma**
Prepared by **2021-02-08**
Reviewed by **2021-02-19**
Approved by **2021-02-22**



- Legend
- Project Area
 - Parcel Boundary
 - Solar Array
 - Inverter
 - BES Building
 - Substation
 - O&M Building
 - Switchyard
 - Generation Line
 - Fence
 - Access Road



Notes
1. Coordinates are based on the 2011 National Aerial Photography
2. Data is based on the 2011 National Aerial Photography
3. Orthophoto is a composite of aerial photography

Preliminary Design for Construction
Stantec

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 21-0036-EL-BGN

Summary: Application - 5 of 30 (Exhibit C - Vegetation Management Plan) electronically filed by Christine M.T. Pirik on behalf of Marion County Solar Project, LLC