Exhibit D

Vegetation Management Plan



To:	Ms. Kimberly Schreckengost and Mr. Mark Carney	From:	Courtney Dohoney
	Scioto Farms Solar Project, LLC		Stantec Consulting Services, Inc.
File:	Scioto Farms Solar Project	Date:	December 2, 2021

Reference: Vegetation Management Plan for the Scioto Farms Solar Project, Pickaway County, Ohio

Stantec Consulting Services Inc. (Stantec) is pleased to provide this vegetation management plan to Scioto Farms Solar Project, LLC (the Applicant) that summarizes conservation measures to be implemented at the Scioto Farms Solar Project in Pickaway 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

The Applicant proposes to develop a solar energy project on privately owned agricultural land in Wayne Township southwest of the City of Circleville in Pickaway County, Ohio. The Project area encompasses approximately 1,070 acres and it is anticipated that the Project will have a footprint of approximately 750 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 and operate the Project.

PROJECT SURVEYS AND VEGETATION IMPACTS

Stantec completed field-based wetland and stream delineation surveys within the Project area on June 28 - 30, 2021. Four wetlands were delineated within the Project area totaling approximately 0.56 acres, one open water features totaling approximately 0.32 acres, and ten streams (four intermittent and six ephemeral), totaling 6,231 linear feet were identified within the Project area. The Project's site design avoids all wetlands and streams identified 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. The Applicant will also implement OEPA Guidance on Post-Construction Storm Water Controls for Solar Panel Arrays to further December 2, 2021 Ms. Kimberly Schreckengost and Mr. Mark Carney Page 2 of 5

Reference: Vegetation Management Plan for the Scioto Farms Solar Project, Pickaway County, Ohio

minimize runoff during operation of the Project¹.

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*) and corn (*Zea mays*) (919.5 acres, approximately 86.6% of the Project area). Second growth deciduous forest (104.0 acres, 9.8%), old field (32.0 acres, 3.0%), maintained lawn (6.2 acres, 0.6%) and wetlands (0.56 acres, <0.1%) comprise the remainder of the Project area. Approximately 723.5 acres of agricultural land will be converted to accommodate the Project facilities. Approximately 8.6 acres of old field areas will also be cleared during construction, primarily to accommodate the photovoltaic (PV) solar modules, the Project substation, switchyard, and operations and maintenance building. Second growth deciduous forest is located within the Project footprint; however, all infrastructure has been sited to avoid the two woodlots located within the Facility so minimal disturbance to 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 to 16 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, and generation tie line); and installation of fencing. Minimal grading and clearing are anticipated for the Project. The underground cable electrical collection system will be installed through open-cut trenching and HDD methods.

Permanent stabilization seeding shall be completed immediately following the completion of construction. The Applicant will make best efforts to implement the pollinator habitat recommendations provided by ODNR Division of Wildlife pertaining to the Ohio Pollinator Habitat Initiative (OPHI). 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 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 stormwater standards².

¹ OEPA 2019. Guidance on Post-Construction Storm Water Controls for Solar Panel Arrays. Accessed December 2021 at: https://www.epa.state.oh.us/Portals/35/storm/Guidance%20on%20Post-

Construction % 20 Storm % 20 Water % 20 Controls % 20 for % 20 Solar % 20 Panel % 20 Arrays.pdf ?ver = 2019-10-22-122431-753

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

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Vegetation may be used as a way to mitigate potential viewshed impacts that would result from the Project. The Applicant has developed a Visual Impact Mitigation Plan as part of the CECPN Application that provides a preliminary screening plan for the Project. The Applicant will continue to work with adjacent non-participating landowners to refine the screening plan and/or mitigate impacts through a Good Neighbor Agreement.

PROJECT OPERATION

Site vegetation will be managed on an as-needed basis through mowing during the operational phase of the Project. When feasible, the Applicant will limit mowing to late summer and fall in order to allow for lateblooming pollinator species to flower. The Applicant 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, the Applicant 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. The Applicant 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 of the Project will be acquired prior to construction and the Applicant 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 me at (703) 485-8554 or courtney.dohoney@stantec.com.

Stantec Consulting Services, Inc.

Cm Dry

Courtney Dohoney, PMP Project Manager

Phone: 703.485.8554

Attachment: Scioto Farms Solar Project, Project Site Layout and Field Survey Map

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ATTACHMENT A FIGURE





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Summary: Application Exhibit D - Vegetation Management Plan electronically filed by Teresa Orahood on behalf of Sommer Sheely