ATTACHMENT D

Vegetation and Weed Management Plan

Goose Prairie Solar

Vegetation and Weed Management Plan

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1. INTRODUCTION

OER WA Solar 1, LLC (the Applicant) proposes to construct and operate Goose Prairie Solar (the Facility), an 80 megawatt (MW) solar photovoltaic project with an optional battery storage system capable of storing up to 80 MW of energy located in Yakima County, Washington.

This document addresses vegetation management activities related to the Facility construction and operation and specifically methods that will be implemented for effective noxious weed control and revegetation. The Applicant has consulted with the Yakima County Noxious Weed Control Board to develop these methods.

2. VEGETATION MANAGEMENT

2.1 CURRENT VEGETATON

The Facility may be located on up to 625 acres (Facility Area). The Facility Area is comprised of land owned by two landowners: the Meacham Property consists of 519 acres and the Martinez Property consists of 280 acres (see Figure 1).

The Meacham Property has two distinct areas. The majority (487 acres) is enrolled in the Conservation Reserve Program which consists predominantly of non-native species such as cheatgrass (downy brome), crested wheat, Russian thistle, mustard species and others. The remainder of the property is made up of intact shrub-steppe in the northern draw that crosses the property east-west. Except for a road crossing and electrical line, this area will be avoided by the Facility and left as-is.

The portion of the Martinez Property that will be used for the Facility is comprised of eastside grassland and both intact and degraded shrub-steppe habitat. Grasslands contain native grass species such as squirreltail, wheatgrasses and bunchgrasses. Shrub-steppe is dominated by sagebrush with a minor component of spiny hopsage, saltbush, greasewood, and other wood shrubs, as well as native forbs such as twin amica, prairie star, arrowleaf balsamroot, and desert parsley. However, dense areas of cheatgrass (downy brome) cover much of the understory in the sage-steppe habitat. The portion considered “degraded” shrub-steppe consists of areas with active grazing resulting in reduced shrub heights or an absence of intact shrub altogether, herbaceous cover and compacted soils.

Figure 2 shows the distribution of habitat types, as defined by the Washington Department of Fish and Wildlife, “Wind Power Guidelines” (WDFW, 2009).

2.2 CONSTRUCTION IMPACTS TO VEGETATON

During construction, Applicant will employ Best Management Practices (BMPs) to avoid impacts to native plant species when possible. These include erosion control and temporary fencing protection. In addition, site preparation will consist of clearing the existing vegetation only in those areas where construction, grading, and road improvements will occur and leaving existing vegetation intact when feasible. Once the site is prepared, the installation of racking systems, modules and inverter pads will use internal access roads. Avoiding incidental impacts to

vegetation during construction helps promote plant communities that are more resistant to non-native plant invasion. Shrubs, grass, and groundcover will, to the maximum extent practicable, remain between rows and under the solar modules. Reclamation measures will be implemented to restore the temporarily disturbed near-surface soils at the Facility site. Permanent impacts from project construction will be minimized whenever possible, enabling the land to return to agricultural uses at the end of its useful life.

2.3 REVEGETATION

Revegetation will be conducted following construction and decommissioning. At the conclusion of construction, disturbed areas will be re-seeded with a weed-free, low-growing native seed mix, selected in coordination with the Washington Department of Fish and Wildlife. The existing conditions will inform the selection of the appropriate seed mix. Applicant may replace lost topsoil in disturbed areas. The method and timing of planting will depend on the seed mix, site conditions and weather.

2.4 OPERATIONAL VEGETATON MANAGEMENT

Minimal on-site maintenance will be required over the life of the Facility. Once the Facility is operational, mechanical control (i.e. mowing) will be conducted on a monthly and/or bi-monthly basis, depending on the season and as-needed, over the entire lifespan of the Facility. The Facility is purposefully designed to allow inter-row spaces wide enough to allow more efficient and effective mower decks access to the majority of the Facility's acreage.

2.5 MONITORING

Operations and maintenance staff will routinely monitor buffer areas for vegetation loss to ensure vegetation replacement occurs quickly. A grounds maintenance schedule will be put into place prior to the start of construction to document the mowing, watering, and vegetation monitoring schedules. The plan will also include approved vegetation management measures to control undesirable plant species, eliminate shading of panels, and maintain reliable access for operations, maintenance, and emergency response purposes should mowing be insufficient.

3. WEED MANAGEMENT

The primary species of concern are described in the Yakima County Noxious Weed List (attached as Appendix 1) which is jointly maintained by the Washington State Noxious Weed Control Board and the Yakima County Noxious Weed Control Board. The list contains the non-native weeds classified as Class A, Class B and Class C. As defined by the Washington State weed law, RCW 17.10 and the Washington State Noxious Weed Control Board, Class A weeds are generally new to the state and rare; landowners are required to completely eradicate these weeds, including their roots. Class B weeds are widespread in some parts of the state, but rare or absent in other parts; The goal with these weeds is to control their spread and reduce their population where found. Finally, Class C weeds are those that are common and widespread; these weeds are not required to be controlled, unless the County Weed Control Board believes they are a threat to agriculture or natural resources.

The Facility will comply with RCW 17.10.140 related to the landowner's duty to control the spread of noxious weeds. All Class A weeds found at the Facility site before or during construction and during operation will be eradicated. Additionally, Class B weeds will be eradicated. Class C weeds will be controlled, and the Facility will work with the Yakima County Noxious Weed Control Board to develop a plan for mitigating the risk of spreading those weeds.

The Applicant has consulted with Susan Bird, a maintenance and outreach specialist with Yakima County Noxious Weed Control. Rush skeleton weed, yellow star thistle and scotch thistle are of primary concern in this area. These weeds revegetate with mechanical treatment and will also be controlled using a broadleaf control herbicide when necessary. Additionally, Yakima County Noxious Weed Control expressed that the gravel used for the roads will be procured from a weed-free source. The Applicant will work with Yakima County Noxious Weed Control to manage these specific noxious weeds and ensure that gravel used for the project is certified weed-free.

Applicant will exercise the following combination of efforts for the most cost-effective and practical approach to managing noxious weed populations:

- Preventative Measures: Monitoring, detection, best management practices, preventative planning and training;
- Control Measures: Mechanical treatment, seed head clipping, and/or herbicide treatment, as appropriate.
- Herbicide Application and Handling Guidelines: Relevant application standards, methods, and transport guidelines.

3.1 PREVENTATIVE MEASURES

Soil preservation and preparation techniques represent the foundation of a successful noxious weed control as disturbed soils are the most common vector for noxious weeds to colonize an area. The likelihood of invasion by noxious weeds can be reduced by rehabilitating ground that is temporarily disturbed during construction. The Facility will minimize soil disturbance during construction, and will replant disturbed areas with low-growing native seed mixes.

Prior to construction, a survey of the existing conditions will be conducted to identify existing noxious weeds. These weeds will be removed during site preparation using a combination of mechanical control and herbicide application.

3.2 CONTROL MEASURES

Once the Facility is operational, mechanical control (i.e. mowing) will be conducted on a monthly and/or bi-monthly basis, depending on the season and as needed, over the entire lifespan of the Facility.

The Facility will retain a qualified landscaping contractor to provide regular weed control and eliminate the spread of new noxious weed presence resultant from construction and operations activity at the Facility site. If herbicide treatment is necessary, Applicant will only use herbicides that are approved for use in the state of Washington by the U.S. Environmental

Protection Agency (EPA) and the Washington State Department of Agriculture (WSDA). In such cases, Applicant will notify landowners of the herbicide proposed for use on their lands and obtain approval prior to application. Applicant will apply herbicides to identified treatable noxious weed populations as described below. If a weed population is deemed to be untreatable (e.g., too widespread and established in area to successfully control), Applicant will implement all the control measures discussed above except treatment with herbicides. Applicant will coordinate with the Yakima County Noxious Weed Control Board and reference the "Pacific Northwest Weed Management Handbook" in determining the appropriate application of herbicides.

The success of the combined targeted chemical control, mechanical control, and low-growing native seed mix will be documented and reported by the operation and maintenance team responsible for maintaining the site.

3.3 HERBICIDE APPLICATION AND HANDLING GUIDELINES

Herbicide application would adhere to EPA and WSDA standards. Only herbicides approved by the EPA and WSDA will be used. In general, application of herbicides would not occur when the following conditions exist:

- Wind velocity exceeds 15 miles per hour for granular application or 10 miles per hour for liquid applications;
- Snow or ice covers the foliage of target species; or
- Adverse weather conditions are forecasted in the next few days.

Hand application methods (e.g., backpack spraying) may be used in roadless areas or in rough terrain. Calibration checks of equipment would be conducted at the beginning of spraying and repeated periodically to ensure that proper application rates are achieved.

Herbicides would be transported to the Facility site with the following provisions:

- Only the quantity needed for that day's work would be transported.
- Concentrate would be transported in approved containers only, in a manner that prevents tipping or spilling, and in a compartment that is isolated from food, clothing, and safety equipment.
- Mixing would be done off site and at a distance greater than 200 feet from open or flowing water, wetlands, or other sensitive resources such as known Threatened and Endangered and sensitive species habitat. No herbicides would be applied at these areas unless authorized by the appropriate regulatory agencies.
- All herbicide equipment and containers would be inspected for leaks daily.
- Herbicide use would be in accordance with all manufacturer label recommendations and warnings.

During the operation of the Facility, chemical control measures shall be conducted on an as-needed basis in a frequency and intensity to be determined by trained professionals according to the guidelines set forth by the Pacific Northwest Weed Management Handbook (PEA, 2020).

4. ADAPTIVE MANAGEMENT

The plan outlined in this document will follow adaptive management practices, whereby management activities will be assessed on a continual basis and amendments to this plan may occur if specific site conditions warrant an alteration to this plan. The Applicant would coordinate any ammendments to this plan with the permitting authority and other parties involved in the management of the Facility.

5. SOURCES

Bird, S., Yakima County Noxious Weed Conrol Board, phone call, November 12, 2020.

Peachey, E., editor. 2020. Pacific Northwest Weed Management Handbook. Corvallis, OR: Oregon State University.

Washington Department of Fish and Wildlife. 2009. Wind Power Guidelines. Olympia, WA. 30pp.

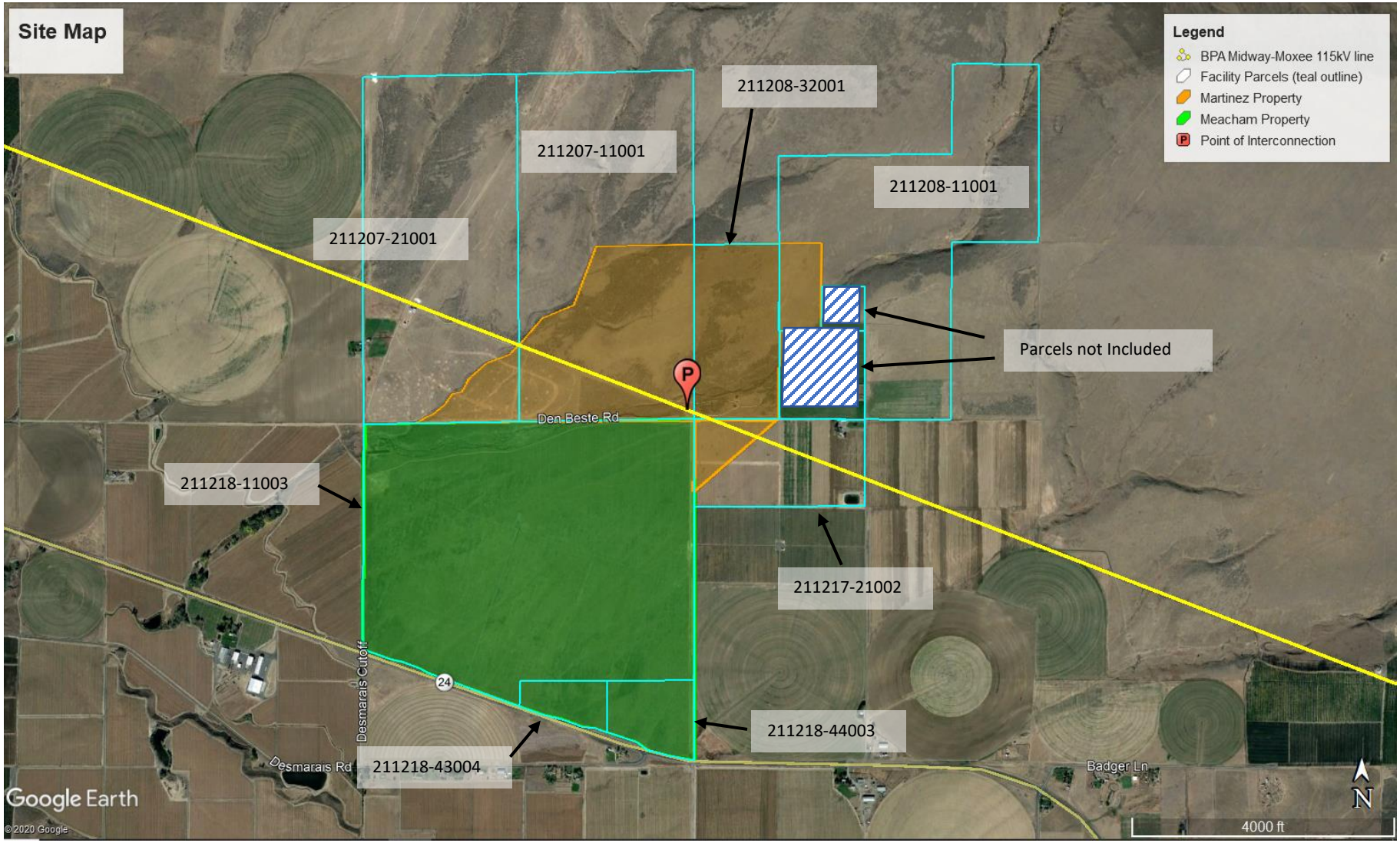

Figure 1: Site Map

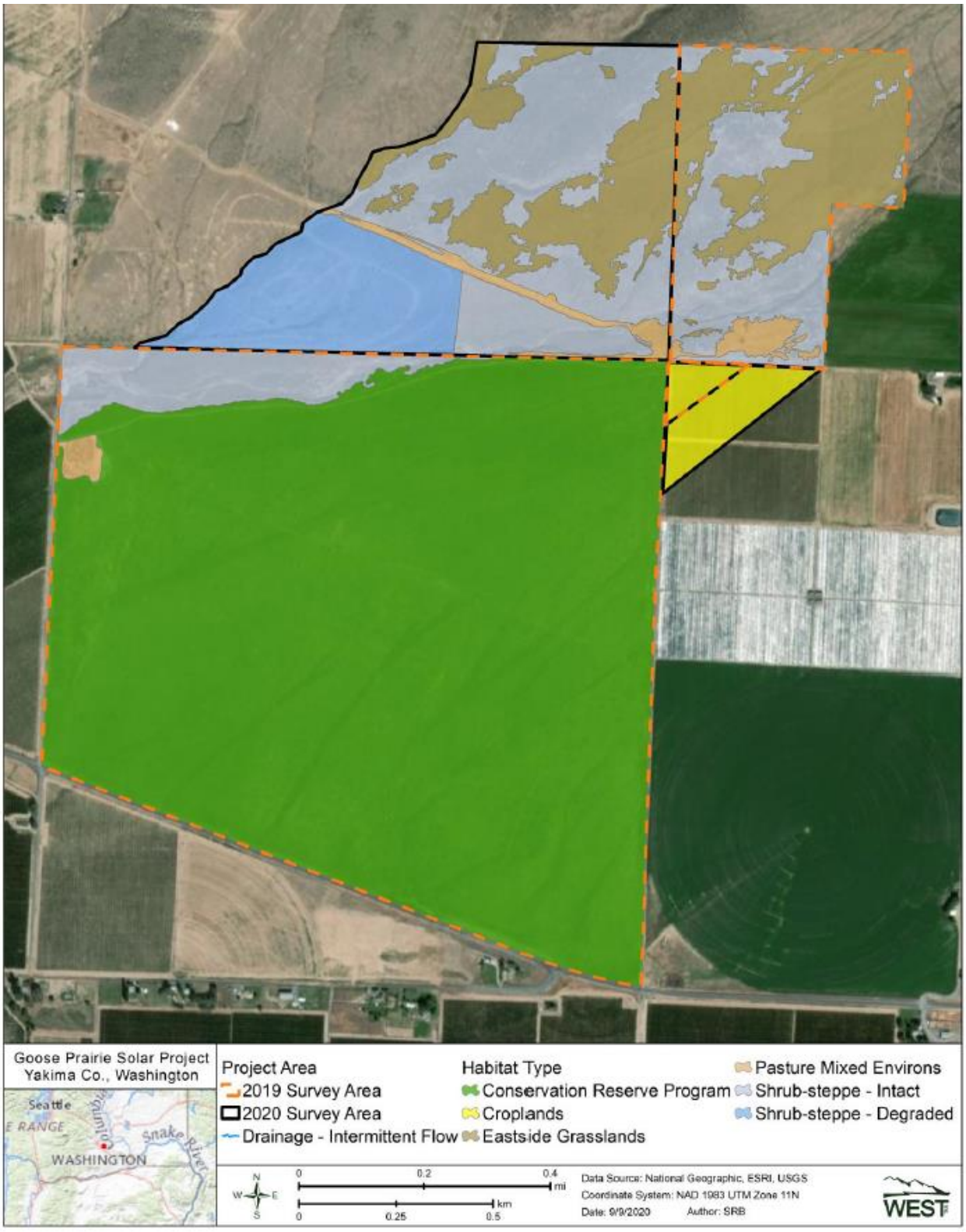

Figure 2: Habitat Types

APPENDIX 1: YAKIMA COUNTY NOXIOUS WEED LIST & CONTROL POLICY

2019
YAKIMA COUNTY NOXIOUS WEED LIST
& CONTROL POLICY

The YAKIMA COUNTY NOXIOUS WEED BOARD (here in after referred to as the BOARD) shall promote weed control by personal contact with LANDOWNERS and through public media. The BOARD will also promote weed control through public seminars, hearings, demonstrations, field tours, school lectures, and at regularly scheduled board meetings. LANDOWNERS are responsible for the control of noxious weeds on their property as per RCW 17.10.140 prior to blooming stage, seed maturity and the development of a root system that would enable said weeds to propagate and spread.

The BOARD shall encourage landowners to control noxious weeds on their own property through their own means, or by means commercially available. Control is defined as stopping all seed production, and containing the noxious weeds to the current infested locations. The Weed Board Coordinator and Inspectors will assist landowners in locating and identifying noxious weeds and encourage the landowner to report to the BOARD other noxious weed infestations. The BOARD, or AUTHORIZED STAFF, has the authority to enter all property within the jurisdiction of this BOARD for the purpose of administering the weed laws of the State of Washington under R.C.W. Chapter 17.10.160.

If the property owner does not promptly act to control the noxious weeds in accordance with R.C.W. 17.10 and this policy, the YAKIMA COUNTY NOXIOUS WEED BOARD may cause their being controlled at the expense of the landowner as per R.C.W. 17.10.170. Charges for regulatory work shall be incurred by the landowner based on the cost, including labor and materials and, if necessary, legal and administrative fees. Such expenses when necessary shall constitute a lien against the property after a hearing and determination has been made on such expense and approved by the BOARD.

The W.A.C. Chapter 16.750 constitutes the Washington State Noxious Weed List, which is classified as "A", "B", and "C" weeds. The following shall constitute Yakima County's Noxious Weed List and control is required within Yakima County.

All Class "A" Weeds
Class "B" Weeds, (All designated & those listed)
Class "C" Weeds, (listed)
All underlined weeds are educational only & no control is required

The Yakima County Noxious Weed Board will conduct regularly scheduled meetings and will encourage public attendance and participation.

Resolution #55: The following requirements will be the policy for placing a weed on the County's Noxious Weed List:

A. The Weed Board shall announce the noxious weed list within the guidelines set forth in R.C.W. 17.10.090.

B. The order in which a weed be submitted to the Board for consideration to be placed on the noxious weed list, the following information must be submitted to the Noxious Weed Board.

1. Location of weed, with an estimation of acreage.
2. Verification that adjacent property owners have been notified on the intent to have the weed placed on the Noxious Weed List.
3. Characteristics of the weed in consideration.

C. The Weed Board has the right to place the weed in question on a review and study list for a set period of time not to exceed one year and, at that time, make a policy statement on the weed in question.

YAKIMA COUNTY NOXIOUS WEED LIST FOR 2019

In accordance with R.C.W. 17.10 a County Noxious Weed List comprising the names of the following plants, which have been declared noxious by the State of Washington Noxious Weed Board, and Yakima County Weed Control Board. Said Board finds these plants to be weedy; highly destructive, competitive, or difficult to control by cultural or chemical practices. Said weeds shall comprise the NOXIOUS WEED LIST for Yakima County for 2019 or until another list is adopted by this Board.

YAKIMA COUNTY lies in REGION 5

ALL CLASS "A" NOXIOUS WEEDS (Mandatory Control) (** Known to be in Yakima County)

COMMON NAME:	SCIENTIFIC NAME:
common crupina	*Crupina vulgaris*
cordgrass, common	*Spartina anglica*
cordgrass, dense flower	*Spartina densiflora*
cordgrass, salt meadow	*Spartina patens*
cordgrass, smooth	*Spartina alterniflora*
dyer's woad**	*Isatis tinctoria*
eggleaf spurge	*Euphorbia oblongata*
false brome	*Brachypodium sylvaticum*
floating primrose-willow	*Ludwigia peploides*
flowering rush	*Butomus umbellatus*
French broom**	*Genista monspessulan*
garlic mustard	*Alliaria petiolata*
giant hogweed	*Heracleum mantegazzianum*
goatsrue	*Galega officinalis*
hydrilla	*Hydrilla verticillata*
Johnsongrass**	*Sorghum halepense*
knapweed, bighead**	*Centaurea macrocephala*
knapweed, Vochin	*Centaurea nigrescens*
kudzu	*Pueraria montana* var. *lobata*

COMMON NAME:	SCIENTIFIC NAME:
meadow clary	*Salvia pratensis*
oriental clematis**	*Clematis orientalis*
purple starthistle	*Centaurea calcitrapa*
reed sweetgrass	*Glyceria maxima*
ricefield bulrush	*Schoenoplectus mucronatus*
sage, clary	*Salvia sclarea*
sage, Mediterranean**	*Salvia aethiopis*
silverleaf nightshade	*Solanum elaeagnifolium*
Small-flowered jewelweed	*Impatiens parviflora*
Spanish broom**	*Spartium junceum*
Syrian bean-caper	*Zygophyllum fabago*
Texas blueweed**	*Helianthus ciliaris*
thistle, Italian	*Carduus pycnocephalus*
thistle, milk**	*Silybum marianum*
thistle, slenderflower	*Carduus tenuiflorus*
variable-leaf milfoil	*Myriophyllum heterophyllum*
wild four o'clock**	*Mirabilis nyctaginea*

CLASS "B" NOXIOUS WEEDS (**Known to be in Yakima County) (Class B designate-bd require mandatory control) (All underlined weeds are educational only & no control is required)

COMMON NAME:	SCIENTIFIC NAME:
blueweed bd	*Echium vulgare*
Brazilian elodea bd	*Egeria densa*
bugloss, annual bd	*Anchusa arvensis*
bugloss, common bd	*Anchusa officinalis*
camelthorn bd	*Alhagi maurorum*
common fennel bd, (except bulbing fennel)	*Foeniculum vulgare* (except *F. vulgare* var. *azoricum)*
common reed** bd (nonnative genotypes only)	*Phragmites australis*
Dalmatian toadflax**	*Linaria dalmatica ssp. dalmatica*
European coltsfoot bd	*Tussilago farfara*
fanwort bd	*Cabomba caroliniana*
gorse bd	*Ulex europaeus*
grass-leaved arrowhead bd	*Sagittaria graminea*
hairy willow-herb** bd	*Epilobium hirsutum*
hawkweed oxtongue bd	*Picris hieracioides*
hawkweed, orange** bd	*Hieracium aurantiacum*
hawkweeds: All nonnative species and hybrids of the meadow subgenus	*Hieracium,* subgenus *Pilosella*
hawkweeds: All nonnative species and hybrids of the wall subgenus	*Hieracium,* subgenus *Hieracium*
herb-Robert bd	*Geranium robertianum*
hoary alyssum bd	*Berteroa incana*
houndstongue** bd	*Cynoglossum officinale*
indigobush bd	*Amorpha fruticosa*
knapweed, black bd	*Centaurea nigra*
knapweed, brown bd	*Centaurea jacea*
knapweed, diffuse **	*Centaurea diffusa*
Knapweed, spotted**bd	*Centaurea stoebe*
knapweed, meadow** bd	*Centaurea* x *moncktonii*
knapweed, Russian **	*Rhaponticum repens*
knotweed, Bohemian	*Polygonum x bohemicum*

COMMON NAME:	SCIENTIFIC NAME:
knotweed, giant **bd	*Polygonum sachalinense*
knotweed, Himalayan bd	*Persicaria wallichii*
kochia **	*Bassia scoparia*
knotweed, Japanese** bd	*Polygonum cuspidatum*
loosestrife, garden bd	*Lysimachia vulgaris*
loosestrife, purple** bd	*Lythrum salicaria*
loosestrife, wand bd	*Lythrum virgatum*
Malta starthistle bd	*Centaurea melitensis*
parrotfeather** bd	*Myriophyllum aquaticum*
perennial pepperweed**	*Lepidium latifolium*
poison hemlock **	*Conium maculatum*
policeman's helmet bd	*Impatiens glandulifera*
punctureVine **	*Tribulus terrestris*
ravenna grass**	*Saccharum ravennae*
rush skeletonweed** bd	*Chondrilla juncea*
saltcedar **bd (unless intentionally planted pre 2004)	*Tamarix ramosissima*
Scotch broom **bd	*Cytisus scoparius*
shiny geranium bd	*Geranium lucidum*
spurge flax bd	*Thymelaea passerine*
spurge laurel bd	*Daphne laureola*
spurge, leafy bd	*Euphorbia virgata*
spurge, myrtle** bd	*Euphorbia myrsinites*
sulfur cinquefoil **	*Potentilla recta*
tansy ragwort** bd	*Jacobaea vulgaris*
thistle, musk** bd	*Carduus nutans*
thistle, plumeless bd	*Carduus acanthoides*
thistle, Scotch** bd	*Onopordum acanthium*
water primrose bd	*Ludwigia hexapetala*
white bryony bd	*Bryonia alba*
wild chervil **bd	*Anthriscus sylvestris*
yellow archangel** bd	*Lamiastrum galeobdolon*
yellow floating heart** bd	*Nymphoides peltata*
yellow nutsedge **	*Cyperus esculentus*
yellow starthistle ** bd	*Centaurea solstitialis*

CLASS "C" NOXIOUS WEEDS (All underlined weeds are educational only & no control is required)

COMMON NAME:	SCIENTIFIC NAME:
absinth wormwood **	*Artemisia absinthium*
black henbane **	*Hyoscyamus niger*
cereal rye **	*Secale cereale*
common barberry	*Berberis vulgaris*
common catsear	*Hypochaeris radicata*
English ivy 4 cultivars only:	*Hedera helix* 'Baltica', 'Pittsburgh', and 'Star', *H. hibernica* 'Hibernica'
Eurasian watermilfoil hybrid	*Myriophyllum spicatum* x *M. sibiricum*
hairy whitetop **	*Lepidium appelianum*
hoary cress **	*Lepidium draba*
Italian arum**	*Arum italicum*
jointed goatgrass	*Aegilops cylindrica*
jubata grass**	*Cortaderia jubata*
old man's beard **	*Clematis vitalba*
oxeye daisy **	*Leucanthemum vulgare*

COMMON NAME:	SCIENTIFIC NAME:
pampas grass**	*Cortaderia selloana*
perennial sowthistle **	*Sonchus arvensis ssp. arvensis*
scentless mayweed **	*Matricaria perforata*
smoothseed alfalfa dodder **	*Cuscuta approximata*
spikeweed	*Hemizonia pungens*
spiny cocklebur **	*Xanthium spinosum*
spotted jewelweed	*Impatiens capensis*
Swainsonpea **	*Sphaerophysa salsula*
thistle, Canada **	*Cirsium arvense*
Control only in T7N R20, 21,22,23E	
tree-of-heaven **	*Ailanthus altissima*
white cockle	*Silene latifolia ssp. alba*
yellow flag iris **	*Iris pseudacorus*
yellow toadflax	*Linaria vulgaris*

For a complete listing of the State Weed List go to www. nwcb.wa.gov/ or stop by the Yakima County Weed Board Office for a copy of the State Weed List.

This 2019 Yakima County Noxious Weed List and Control Policy has been adopted by:

_____ _____ _____ _____

Chairman of the Board *Date* *Board Member* *Date*

_____ _____ _____ _____

Board Member *Date* *Board Member* *Date*

_____ _____

Board Member *Date*