

Horse Heaven Clean Energy Center

Dryland Farming Management Plan

Prepared for:

Horse Heaven Wind Farm, LLC

Prepared by:



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1.0 Introduction

This Dryland Farming Management Plan (Plan) is prepared to fulfill mitigation measure LSU-2 from the Horse Heaven Site Certification Agreement (SCA).

LSU-2 Dryland Farming Management Plan: The Certificate Holder shall prepare a dryland farming management plan for construction, operation, and decommissioning that outlines communication requirements between the Certificate Holder and the land owners. The plan shall establish work windows that will allow farmers uninterrupted access to their fields for dryland wheat planting and harvesting.

As required by the SCA, it describes how the Certificate Holder will coordinate with landowners and tenant farmers during Project construction, operation, and decommissioning. The objective is to reduce conflicts between Project activities and dryland wheat farming by establishing clear communication expectations, practical notice periods, and field-work protocols that reflect local farming practices.

2.0 Background and Rationale

The Project lease area covers approximately 72,000 acres and spans more than 25 miles east-west, with elevations ranging from approximately 1,200 feet to more than 2,000 feet. The SCA states that the Plan shall establish work windows that will allow farmers uninterrupted access to their fields for dryland wheat planting and harvesting.

Timing of dryland wheat activities varies across the lease area because weather patterns differ with elevation, and because farming operations differ among the more than 45 landowner individuals and entities. As a result, the timing of field activities can vary substantially from farm to farm and from year to year.

Key farming periods in the lease area typically include: (1) spring planting (March–May), (2) harvest (July–August), and (3) fall planting (September–November). Due to the size of the Project, the variation in when farming activities are occurring in different parts of the Project area or by different landowners, and the extent of farming activities across the calendar year means that attempting to create uniform, uninterrupted construction ‘work windows’ that avoid all field activities for all landowners would be unachievable.

Instead, the Certificate Holder will implement a communication-based approach that emphasizes early notice, coordination at the parcel or farm-entity scale, and field protocols designed to minimize crop disturbance, traffic conflicts, weed introduction, and fire risk.

3.0 Crop Seasons of Importance

The following periods reflect typical timing for common dryland farming activities in the lease area. These periods are approximate and may shift by elevation, weather, and farm-specific practices. These timeframes are provided to support construction planning and communication.

Table 1. Dryland Farming Activity Schedule

Activity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Spring wheat planting			x	x								
Tillage/ Mechanical weed control			x	x	x	x	x	x	x	x		
Wheat harvest*							x	x				
Fall wheat planting								x	x	x	x	
Conservation Reserve Program perennial grass planting											x	x
Spraying			x	x	x	x	x	x	x	x	x	
Mowing	x	x	x	x	x	x	x	x	x	x	x	x

*Note: Harvest often begins first in lower elevations and progresses toward higher elevations as crops ripen later across the lease area.

4.0 Construction Communication Protocol

Communication regarding the timing of construction, operations, and decommissioning activity relative to annual farming activities will require ongoing engagement from the Certification Holder and all landowners with land in locations where Project activities may be present. This communication plan is informed by the timing of annual farming activities, and potential conflicts that may arise between farming activities and construction activities, as described by local farmers. Since the actual timing of farming activities have some variation based on seasonality and weather, and specifics around the timing of construction activities is variable and subject to change, the plan is meant to adapt to the circumstances as they emerge during construction.

4.1 Certification Holder Communication Obligations

Master Communication List: The Certificate Holder will maintain a master communication list that links landowners, tenants, and designated contacts to specific parcels. Prior to construction, each landowner will be offered the opportunity to appoint a primary point of contact for scheduling and conflict resolution, though multiple contacts may be maintained for any given parcel, depending on relationships between owners and tenant farmers.

Monthly Newsletter: A short monthly construction newsletter will be distributed electronically or in hard copy to all participating landowners and other representatives. The monthly newsletter will generally summarize recent work and upcoming activities. This will include a description of where Project work is to occur, so that landowners have a general awareness of where activity will be the highest, and the types of activities to expect. Information in the newsletter will typically describe activities for the upcoming month, or several weeks.

Advance Notice: The Certificate Holder will be in communication with landowners and other representatives regarding activities that need to occur on individual parcels at least one month prior to that work occurring. This will include the expected traffic, route of access, and any likely road closures or traffic delays while construction equipment or Project components are being delivered or moved around the site. If this work occurs during a time of year when the landowner or other representative also needs to access those parcels, and therefore anticipates a disruption to farming operations, the Certificate Holder will work with the construction contractor to schedule deliveries or construction traffic in a manner that minimizes those disruptions to the extent practical.

Seven-day Notice: Then, as the window of the activity becomes more specific, the Certificate Holder will provide at least seven (7) days' notice identifying the type of activity, its expected duration, and the primary access routes that may be affected. The Certificate Holder will have a representative on site during any activities that have the potential to cause disruption to farming activities in order to make "day of" decisions to resolve issues, should they arise.

Designated Point of Contact: During construction of the Project the Certificate Holder will have a designated point of contact for all landowner interactions. This designated point of contact will interface between landowners or tenant farmers and the construction contractor and will have decision making authority to modify construction operations, when necessary, to minimize conflicts with farming activities. Maintaining one point of contact will eliminate confusion that may arise if multiple individuals are providing direction or information regarding Project-related or farming-related activities.

Agreements for implementation of these responsibilities will be codified in lease agreements between landowners and the Certificate Holder. For non-participating landowners formal agreements may be negotiated if requested by the landowners or Certificate Holder.

4.2 Landowner/Tenant Communication Obligations

The Certificate Holder will request that landowners and tenant farmers provide a minimum of 72 hours notice prior to initiating major field activities (excluding harvest) occurring within or adjacent to active construction zones. If fieldwork may conflict with construction, the parties will coordinate field sequencing to minimize interference when practical.

For harvest activities, landowners will be requested to provide at least seven (7) days' notice, recognizing the higher volume of roadway use and the limited maneuverability of grain trucks on gravel grades. Landowners should also notify the Certificate Holder of pesticide applications and specify applicable restricted-entry intervals (REIs) when Project personnel may be nearby.

4.3 Harvest

Harvest season is the period of highest roadway use within the lease area, and coordination is required to maintain safe and efficient movement of farm equipment and construction traffic. During this period, the Certificate Holder will work with the construction management team to minimize congestion and ensure that farm vehicles can access fields without delay.

The Certificate Holder will communicate designated construction delivery routes in advance and, where practicable, will avoid scheduling large component deliveries during peak harvest periods. If deliveries or other activities are required to occur during peak harvest activities, this will be identified well in advance, so that a contingency plan can be developed for that individual route. Temporary traffic control measures may be implemented by the Certificate Holder in locations where roadway geometry such as blind corners, steep grades, or soft shoulders creates increased safety risks. Downhill traffic will always yield to uphill traffic, and one vehicle will cross canyons at a time. Grain trailers must maintain minimum speeds and need unimpeded momentum to carry them up hills. Grain trailers also have minimal ability to back up, meaning that oncoming traffic would need to yield to them.

Additional coordination will occur in areas where Project roads directly affect farm access, including:

- Where new Project roads overlap existing farm field roads, resulting in shared use by harvest operations and construction vehicles.
- Where new Project roads bisect a field, requiring the Project road to serve as the access route to the rear portion of the field during harvest.

In these locations, the Certificate Holder and the construction management team will coordinate with affected landowners to maintain uninterrupted harvest access. Construction traffic may be rerouted, rescheduled, or otherwise limited when necessary to support safe and timely movement of combines, grain trucks, and other harvest equipment.

5.0 Construction Protocols in Agricultural Fields

5.1 Contractor Obligations

Limit Field Activity: Contractors will limit vehicle activity within actively growing cropland to the minimum necessary to complete construction tasks and non-essential traffic will remain on established gravel access roads whenever feasible. When travel within seeded fields cannot be avoided, drivers will use established tire tracks to minimize disturbance and reduce erosion. Prior to tire tracks becoming pulverized, a new set of tracks parallel to the first set may be used. Routes through fields will be coordinated with the landowner’s designated representative. If necessary, designated travel routes may be flagged. Field crossings used by farm equipment will not be blocked by parked Project vehicles.

Vehicle Precautions: To reduce fire risk, vehicles will avoid prolonged idling within cropland, and engines will be shut off when stopped unless required for safety. Parking will occur in areas with shorter or green residue whenever possible, and vehicles will not be parked in dense patches of cheatgrass during hot, dry periods. Drivers will visually inspect exhaust systems after traveling through tall vegetation and remove accumulated plant material from undercarriages to prevent ignition hazards. Project vehicles will be equipped with fire extinguishers. In the event of “red-flag conditions” vehicle access in cropland or areas with standing vegetation may be limited.

Contractors will also take precautions to avoid the introduction or spread of noxious weeds, as defined by the Benton County Noxious Weed Control Board, and as required by the Revegetation and Noxious Weed Management Plan¹.

5.2 Landowner and Farm Personnel Obligations

Participating landowners and farm personnel will avoid entering active construction areas except when necessary for farming operations and when coordinated through the communication protocols described in Section 4.0. When routine farm travel routes intersect Project work areas, such as near laydown yards, wind turbine pads, or array construction zones,

¹ Horse Heaven Wind Farm. 2021. Revegetation and Noxious Weed Management Plan. Application for Site Certification, Appendix N. Prepared by Tetra Tech. Prepared for Horse Heaven Wind Farm, LLC. January.

the Certificate Holder will coordinate with farm operators to identify safe access routes and ensure that all personnel in the vicinity can be accounted for in the event of an emergency.

5.3 Security and Site Access Protocols

Because farm personnel and contractors (e.g., grain truck drivers, chemical delivery, weeding crews) may access the lease area at different times, the Certificate Holder will implement a practical, remote check-in/check-out process for all non-routine visitors and for farm personnel entering active construction zones. This eliminates the need for farmers to travel to the construction headquarters to physically check in and out. Due to the size of the Project this could take significant time and may discourage compliance. Security staff will be informed that farmers may leave equipment and vehicles in fields overnight, and that normal farm visitors are expected. Visitor and access requirements and the Certificate Holder point of contact will be communicated in the monthly newsletter and through parcel-specific notices.

6.0 Operations and Decommissioning Protocols

Once construction is complete and routine operations are underway, activity levels within the Project area will be substantially lower than those experienced during construction.

Quarterly Operations Newsletter: To maintain clear communication with landowners and tenant farmers, the Certificate Holder will distribute a quarterly operations newsletter summarizing routine activities and identifying any anticipated maintenance work for the upcoming period. Over time, the frequency of that newsletter may become more frequent (i.e., back to monthly) or less frequent, depending on feedback from landowners and in response to changes in Project activity level.

When major maintenance or repairs are required, the Certificate Holder will notify the affected landowners, tenant farmers, or their designated contacts as early as practicable. Although certain maintenance tasks may be time-sensitive, the Certificate Holder will coordinate with farm operators to the extent possible so that field activities and maintenance work do not conflict. If major maintenance is occurring within a parcel, the Certificate Holder and farm operators will follow the communication and access guidelines described in Section 4.0. When no major maintenance activities are scheduled, routine farm operations may proceed without additional notice to the Certificate Holder.

Decommissioning activities will follow the same communication, access, and field-use protocols established for construction, as described in Sections 4.0 through 5.0. Notice periods and coordination requirements may be adapted to reflect the scale and sequencing of the decommissioning work, but the underlying principles of early communication, safe access, and minimization of agricultural disruption will remain consistent.

