

Draft Amended Revegetation Plan

Oregon Trail Solar Facility

Prepared for
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Prepared by



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1.0 Introduction

Oregon Trail Solar, LLC (Oregon Trail) holds a Site Certificate from the Oregon Energy Facility Siting Council (EFSC) for the Oregon Trail Solar Facility (Facility) in Gilliam County, Oregon. Condition 92 of the Site Certificate requires the following:

The certificate holder shall restore areas disturbed by facility construction but not occupied by permanent facility structures according to the methods and monitoring procedures described in the final Revegetation Plan for the facility, as approved by the Department in consultation with ODFW. The final Revegetation Plan shall be based on the draft plan as Attachment E in the Final Order on Request for Amendment #5.

The Oregon Trail Solar Facility will be developed in two phases: Phase 1 will involve the construction of the battery storage system, while Phase 2 will focus on building the solar arrays and associated collection line infrastructure. During preconstruction compliance of Phases 1 and 2, in consultation with Oregon Department of Energy (ODOE) and Oregon Department of Fish and Wildlife (ODFW), it was determined that construction will not result in temporary habitat impacts. Therefore, this Revegetation Plan is not needed for habitat restoration.

Construction will result in temporary disturbance to Category 6 habitat, which does not require a detailed approach to habitat restoration. Temporarily disturbed areas include Developed lands (winter wheat crop fields and gravel laydown yard for the adjacent Pachwáywit Fields solar facility), Eastside Grasslands, and Exotic Annual Grasslands. The intensity of the construction impact will vary. In some areas, the impact will be relatively light; but in other areas, heavy construction activity will remove all vegetation, remove topsoil, and compact the remaining subsoil.

Where vegetation has been damaged or removed during construction, the Certificate Holder will restore suitable vegetation. In addition, the certificate holder will maintain erosion and sediment control measures put in place during construction until the affected areas are restored, as described in the Noxious Weed Plan.

2.0 Description of the Project Site

2.1 General Description

The Project is in northeastern Gilliam County, Oregon. The Project site is on private agricultural land used primarily for livestock grazing, annual cropping, and eastside grassland habitat, as well as a laydown yard for the existing Pachwáywit Fields Solar facility. The Project site, including Phase I and Phase 2, is shown on Figure 1. Existing gravel roads used to access the Solar facility's substation and Oregon Trail Solar's BESS construction site are also within the Project site boundaries. The Developed lands are currently graded and covered with a gravel layer; this area was used to stage equipment during construction (including construction trailers) and as parking lots for all staff working on the Pachwáywit Fields Solar facility.

The Project's components are located on the Ritzville Unit soil type. Soils are aridic (bordering xeric), well-drained, moderately permeable, fertile silt loams formed in loess deposits. The area receives between approximately 9 and 15 inches of precipitation annually, most of which occurs between October 1 and March 31.

The Project is within the Columbia Plateau physiographic province. It is located on an upland plateau at elevations ranging from approximately 530 feet to 1,520 feet. Most of the native vegetation within the Project site boundary has been modified by historical and ongoing livestock grazing, as well as past wildfires.

The general land cover types within the Project site boundary are Developed and Grassland. The Grassland habitat can be further characterized as Exotic Annual Grassland. It is full of weedy annual grasses and forbs such as cheatgrass (*Bromus tectorum*), bulbous bluegrass (*Poa bulbosa*), medusahead (*Taeniatherum caput-medusae*), red storksbill (*Erodium cicutarium*), tumble mustard (*Sisymbrium altissimum*), Russian thistle (*Salsola tragus*), and yellow salsify (*Tragopogon dubius*).

2.2 Description of the Wildlife Habitat Revegetation Areas

Based on preconstruction habitat assessment, there are no areas of wildlife habitat that will be temporarily impacted during construction, as presented in Table 1.

Table 114. Summary of Wildlife Habitat Revegetation Areas

Habitat Description	Temporary Impact (Acres)
Category 4	
Exotic Annual Grassland	0
Category 4 Subtotal	0.0
Category 5	
Eastside Grasslands	0.0
Exotic Annual Grassland	0.0
Category 5 Subtotal	0.0
Category 6	
Eastside Grasslands	16.9
Orchards, Vineyards, Wheat Fields, Other Row Crop	58.9
Urban and Mixed Environments	9.6
Category 6 Subtotal	85.4

3.0 Pre-Revegetation Agency Consultation and Revegetation Methods

3.1 Consultation

This plan was originally prepared for Phase 1 and was reviewed by the Oregon Department of Fish and Wildlife (ODFW), the Oregon Department of Energy (ODOE), and Gilliam County Weed Control Authority as part of original permitting and consultation prior to construction to discuss the areas to be restored, habitat category and habitat subtype conditions, Facility site location and conditions (if applicable), topsoil restoration and revegetation methods, erosion and sediment control measures, and implementation schedule. Updates to the plan have been made to reflect impacts for the Phase 2 area. During construction, the Certificate Holder will implement site stabilization measures, including seeding of temporarily disturbed areas according to its National Pollutant Discharge Elimination System permit. Prior to or following commencement of commercial operation of the Facility, depending on the timing of commencement of operation relative to the growing season, the Certificate Holder will meet with ODFW, ODOE and Gilliam County Weed Control Authority to review the actual extent and conditions of temporarily impacted areas and to confirm the revegetation methods agreed to during pre-construction review are still appropriate. This meeting will be scheduled to coincide with the growing season the year commercial operation commences to accurately assess revegetation methods based on pre-existing vegetation conditions and composition during the appropriate time period.

The Certificate Holder shall restore temporarily disturbed wildlife habitat areas by preparing the soil and seeding using common application methods. In areas where soil is removed during construction, the topsoil shall be stockpiled separately from the subsurface soils. The conserved soil shall be put back in place as topsoil prior to revegetation activities. Additional site-specific soil preparation and seeding methods may be determined during the agency consultation period. The Certificate Holder shall use mulching and other appropriate practices to control erosion and sediment during construction and during revegetation work. The Certificate Holder shall select the seed mix to apply based on the pre-construction land use, as described below. In order to maximize flexibility for weed control, the seed mix shall consist of grasses only, with shrub seeding to occur through normal plant succession. The Certificate Holder shall consult with ODFW regarding appropriate seeding or planting per site-specific restoration needs. Seeding

The recommended seed mix is based on regionally appropriate species. Modifications to seed mixes may be required based on site conditions, climate, establishment performance, and market availability. Any proposed alterations should be made with Oregon Trail's approval and maintain an appropriate seeding rate and species functional group compositions. The seeding window should be during the winter season (October 1 – March 30) for success in the Arid West.

Table 2. Recommended Seed Mix

Scientific Name	Common Name	Percent Composition
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Grasses		
<i>Achnatherum hymenoides</i>	Ricegrass	20%
<i>Elymus elymoides</i>	Bottlebrush Squirreltail	20%
<i>Elymus lanceolatus</i> spp. <i>lanceolatus</i>	Thickspike Wheatgrass	20%
<i>Poa secunda</i>	Sandberg's Bluegrass	20%
<i>Pseudoroegneria spicata</i>	Bluebunch Wheatgrass	20%
<i>Total Graminoids:</i>		100%
Forbs		
<i>Achillea millefolium</i>	Yarrow	30%
<i>Erigeron pumilus</i>	Shaggy Fleabane	20%
<i>Eriogonum niveum</i>	Snow Buckwheat	20%
<i>Linum lewisii</i>	Blue Flax	30%
<i>Total Forbs:</i>		100%
Shrubs		
<i>Chrysothamnus viscidiflorus</i>	Green Rabbitbrush	60%
<i>Ericameria nauseosa</i>	Rubber Rabbitbrush	40%
<i>Total Shrubs:</i>		100%

3.2 Seed Planting Methods

Planting shall be done based on ODFW and Gilliam County Weed Control Authority recommendations and in consultation with the seeding contractor at the appropriate time of year to facilitate seed germination, based on weather conditions and the time of year when construction-related ground disturbance occurs. The Certificate Holder shall choose planting methods based on site-specific factors such as slope, erosion potential and the size of the area in need of revegetation. Disturbed ground may require chemical or mechanical weed control before weeds have a chance to go to seed. Two common application methods are described as follows.

(a) Broadcasting

Broadcast the seed mix at the specified application rate. Where feasible, apply half of the total mix in one direction and the second half of mix in the direction perpendicular to first half. Apply weed-free straw from a certified field or sterile straw at a rate of two tons per acre immediately after applying seed. Crimp straw into the ground to a depth of two inches using a crimping disc

~~or similar device. As an alternative to crimping, a tackifier may be applied using hydroseed equipment at a rate of 100 pounds per acre. Prior to mixing the tackifier, visually inspect the tank for cleanliness. If remnants from previous hydroseed applications exist, wash tank to remove remnants. Include a tracking dye with the tackifier to aid uniform application. Broadcasting should not be used if winds exceed five miles per hour.~~

(b) Drilling

~~Using an agricultural or range seed drill, drill seed at 70 percent of the recommended application rate for broadcasting to a depth of 1/4 inch or as recommended by the seed supplier. Where feasible, apply half of the total mix in one direction and the second half of mix in the direction perpendicular to first half. If mulch has been previously applied, seed may be drilled through the mulch provided the drill can penetrate 1 the straw resulting in seed-to-soil contact conducive for germination.~~

4.0 Restoration of Wildlife Habitat Areas

~~The Certificate Holder shall implement topsoil salvage and restoration methods as recommended by ODFW, the Gilliam County Weed Control Authority, and the contractor, and could include measures such as scraping and stockpiling the upper 6 inches of topsoil containing the fertile nutrients, to be segregated in windrows, kept intact and protected, and used as the top-dressing for the area of disturbance.~~

~~The Certificate Holder shall seed all disturbed Grassland areas, as identified in Table 1. The Certificate Holder shall consult with ODFW, Gilliam County Weed Control Authority, the landowner, and the contractor to determine the appropriate seed mix and application rate for these areas based on the characteristics of the affected area. In order to maximize flexibility for weed control, the seed mix shall consist of grasses only, with shrub seedling to occur through normal plant succession. The mix should contain native or native-like species selected based on relative availability and compatibility with local growing conditions. Seed mix selection should consider soil erosion potential, soil type, seed availability and the need for using native or native-like species. The Certificate Holder shall obtain approval of the composition of the seed mix from ODOE. The Certificate Holder shall use seed provided by a reputable supplier and complying with the Oregon Seed Law. The Certificate Holder shall obtain young native shrub species from a qualified nursery or suitable transplants from construction zones.~~

5.0 Restoration of Cropland Areas

~~The certificate holder shall seed disturbed cropland areas with wheat or other crop seed. The certificate holder shall consult with the landowner and farm operator to determine species composition, seed and fertilizer application rates and application methods.~~

Cropland areas are successfully revegetated when the replanted areas achieve crop production comparable to adjacent, undisturbed cultivated areas. The certificate holder shall consult with the landowner or farmer to determine whether these areas have been successfully revegetated and shall report to the Oregon Department of Energy (Department) on the success of revegetation in these areas.

5.0 Noxious Weed Prevention and Control

~~The Certificate Holder shall implement weed prevention and control measures prior to and during revegetation efforts. The construction contractor will take the following measures to avoid, minimize or reduce the impacts of noxious weeds:~~

- ~~Information regarding target weed species will be provided at the operations and maintenance building.~~
- ~~Weed prevention and control measures, including facility inspection and documentation, will be included in operations plans.~~
- ~~Temporary ground disturbing operations in weed infested areas will be inspected and documented in accordance with the facility monitoring plan.~~
- ~~Vehicles and equipment will be cleaned before entry into and exit from revegetation areas to help minimize introduction of noxious weed seeds to the site.~~
- ~~To prevent conditions favoring weed establishment, temporarily disturbed areas will be revegetated soon as possible.~~
- ~~The site will be revegetated with appropriate, locally collected native seed or native plants; when these are not available, noninvasive and nonpersistent, nonnative species may be used.~~
- ~~Seed and straw mulch to be used for site rehabilitation will be inspected and certified free of weed seed and propagules.~~

6.0 Monitoring

6.1 Revegetation Record

~~The Certificate Holder shall maintain a record of revegetation work for wildlife habitat areas. In the record, the Certificate Holder shall include the date that construction activity was completed in the area to be restored, a description of the affected area and supporting figures representing the location (location, acres affected and pre-disturbance condition), the date that revegetation work began and a description of the work done within the affected area. The Certificate Holder shall report restoration activities to the ODOE for the first 5 years after the completion of facility~~

~~construction. After 5 years, any restoration actions will be described in the annual report per OAR 345-026-0080(2)(e).~~

~~6.2 Monitoring Procedures~~

~~Due to the size and similar habitat types of the facility, will be used and revegetation for the site will be considered as a whole. The Certificate Holder shall monitor the revegetation of wildlife habitat areas as described in this section, unless the landowner has converted the area to a use inconsistent with the success criteria.~~

~~6.2.1 Weed Control~~

~~Weed control will be performed in accordance with the Project's Noxious Weed Control Plan (Tetra Tech 2025). Before the initial weed treatment begins, the herbicide applicator personnel will meet with a botanist for a half day session to review the target species and their identification, and to identify native species to be avoided, such as the native thistle (*Cirsium undulatum*) onsite. Following the initial meeting between the botanist and herbicide applicators, the applicators will be responsible for identifying and treating the target species.~~

~~Control will be accomplished through use of herbicides targeted to the individual weed species. The herbicide is to be applied by a licensed applicator, using appropriate best management practices. Herbicide application will occur twice in Year 1, in the spring (knapweeds and thistles) and fall (other species), and once a year thereafter during the spring (mid to late May), if necessary, until the success criteria are met. Herbicide will be applied with a spreader sticker surfactant (e.g., Dynamic Green Concepts, Phase). Rush skeletonweed (*Chondrilla juncea*) will be treated throughout the growing season as it occurs. Information on identification of this and other target weed species will be included in the environmental training materials to be provided to Oregon Trail operations staff. If rush skeletonweed is observed during routine operations activities at any time during the growing season, the licensed applicator will be contacted to treat this species as soon as it is observed as practicable. If control measures are ineffective, the Certificate Holder will confer with ODOE, ODFW, and the Gilliam County Weed Control Authority to develop alternative control measures.~~

~~6.2.2 Wildlife Habitat Recovery~~

~~After the first growing season following initial seeding (Year 1), a qualified investigator shall inspect each revegetation area to assess revegetation success based on the success criteria and to recommend remedial actions, if needed. The qualified investigator shall reinspect these areas annually for the first five years following the completion of construction. The Certificate Holder shall submit, electronically, to ODOE and ODFW the investigator revegetation inspection report within 60 days following each inspection. The report will include the investigator's assessment of whether the revegetated areas are trending toward meeting the success criteria, an assessment of factors impacting the ability of the revegetated area to trend towards meeting the success criteria, a~~

~~description of appropriate weed control measures as recommended by ODOE, ODFW, and Gilliam County Weed Control Authority, and any remedial actions recommended.~~

~~The Certificate Holder shall confer with ODOE and ODFW within 60 days of receipt of the investigator's inspection report to develop an action plan for subsequent years. If an area is not trending toward meeting the success criteria at Year 5 and has not been converted by the landowner to an inconsistent use, the Certificate Holder may propose and ODOE may require remedial action and additional monitoring based on an evaluation of site capability. As an alternative, the Certificate Holder or ODOE may conclude that revegetation of the area was unsuccessful and propose appropriate mitigation for the permanent loss of habitat quality and quantity. The Certificate Holder shall implement the action plan, subject to the approval of ODOE.~~

~~The Certificate Holder's qualified investigator shall evaluate whether a wildlife habitat area is trending toward meeting the success criteria by assessing the revegetation area as a whole. Reference sites will not be selected for this project due to the small size of the site.~~

~~During the initial 5 years of annual monitoring, the Certificate Holder's qualified investigator shall assess the site for revegetation regrowth across the entire area, unless some event (such as wildfire, tilling, or intensive livestock grazing) has changed the vegetation conditions so that it no longer represents undisturbed conditions of the revegetation area.~~

~~The Certificate Holder will submit its vegetation monitoring methodology to ODFW and ODOE for approval prior to assessing baseline conditions and prior to annual monitoring. Within each revegetation area, the investigator shall evaluate the progress of wildlife habitat recovery. The investigator shall evaluate the following site conditions:~~

- ~~Degree of erosion due to disturbance activities (high, moderate, or low);~~
- ~~Vegetation density;~~
- ~~Relative proportion of desirable vegetation as determined by the average number of stems of desirable vegetation per square foot, or by a visual scan of the area, noting overall recovery status (desirable vegetation is defined as native plant species and nonnative plant species not occurring on state or county noxious weed lists); and~~
- ~~Species diversity of desirable vegetation.~~
- ~~Comparison to Success Criteria outlined in Section 6.3~~

~~The Certificate Holder shall report the investigator's findings and recommendations regarding wildlife habitat recovery and revegetation success within 60 days of the inspector's investigation to ODOE and to ODFW.~~

6.3 Success Criteria

~~In the Oregon Trail Solar 2022 Habitat and Rare Plants Survey Report (Tetra Tech 2022), pre-construction conditions consisted of grassland areas in former dryland wheat fields and laydown yard. These areas were dominated by annual invasive species such as cheatgrass (*Bromus tectorum*),~~

tall tumblemustard (*Sisymbrium altissimum*), remnants of wheat (*Triticum aestivum*), and Russian thistle (*Salsola tragus*).

~~In each monitoring report to ODOE, the Certificate Holder shall provide an assessment of revegetation success for all previously disturbed wildlife habitat areas. Since no reference sites are selected for this project, a wildlife habitat area will be considered successfully revegetated when its habitat quality is equal to, or better than, the habitat quality of the site's pre-construction conditions as follows:~~

- ~~Native Grasses: Revegetated sites should maintain grass species diversity and density that is at least 85 percent similar to the pre-construction site. Native bunchgrasses should be given preference. Native grasses are to be planted at rates sufficient to achieve abundance and diversity characteristics of the grass component.~~
- ~~Non Native Weeds: all species listed on county, state, and federal noxious weed lists shall be controlled. All state and federal laws pertaining to noxious weeds must be followed. Highly competitive invasive species such as cheatgrass and other weedy brome grasses are prohibited in seed mixtures and should be actively controlled if any are found in the reclaimed areas.~~

~~When ODOE finds that the condition of a wildlife habitat area satisfies the criteria for revegetation success, ODOE shall conclude that the Certificate Holder has met its restoration obligations for that area. If ODOE finds that the landowner has converted a wildlife habitat area to a use that is inconsistent with these success criteria, ODOE shall conclude that the Certificate Holder has no further obligation to restore the area for wildlife habitat uses.~~

6.4 Remedial Action

~~After each monitoring visit, the Certificate Holder's qualified investigator shall report to the Certificate Holder regarding the revegetation progress of each wildlife habitat area. The investigator shall make recommendations to the Certificate Holder for reseeding, weed control or other remedial measures for areas that are not showing progress toward achieving revegetation success based upon consultation with ODOE, ODFW, the Gilliam County Weed Control authority, and the contractor. The investigator shall provide a description of causal factors that may be contributing to the lack of revegetation success. The Certificate Holder shall take appropriate action to meet the objectives of this revegetation plan. Within 60 days of receipt of the investigator's monitoring report, the Certificate Holder shall report to ODOE the investigator's recommendations and the remedial actions taken. ODOE may require reseeding, weed control or other remedial measures in those areas that are not trending towards meeting the success criteria by Year 5.~~

~~If a wildlife habitat area is damaged by wildfire during the first 5 years following initial seeding, the Certificate Holder shall work with the landowner to restore the damaged area. The Certificate Holder shall continue to report on revegetation progress during the remainder of the 5 year period. The Certificate Holder shall report to ODOE and ODFW the area impacted by the fire (map or~~

figure), damage caused by wildfire (including acreage and facility components impacted) and the cause of the fire, if known.

7.03.0 Amendment of the Plan

This revegetation plan may be amended from time to time by agreement of the Certificate Holder and EFSC. Such amendments may be made without amendment of the site certificate. EFSC authorizes ODOE to agree to amendments to this plan. ODOE shall notify EFSC of all amendments, and EFSC retains the authority to approve, reject, or modify any amendment of this plan agreed to by ODOE.

8.04.0 References

Tetra Tech. 2022. Oregon Trail Solar 2022 Habitat and Rare Plants Survey Report.

Tetra Tech. 2025. Oregon Trail Solar (Phase 2) Habitat Survey Memo. October 2025.

Tetra Tech. 2025. Noxious Weed Control Plan. Oregon Trail Solar Facility. October 2025.