Gustin Solar

Harrisville Township

Exhibit J

Vegetation Management Plan

September 23, 2026

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Purpose

The purpose of this Vegetation Plan is to establish a consistent, proactive approach to land stewardship throughout the development, construction, operation, and decommissioning of utility-scale solar facilities. Proper planning and execution are essential to promoting long-term site stability, environmental protection, worker safety, and operational efficiency.

This plan is intended to establish and maintain desirable, sustainable ground cover as early as practicable and throughout the life of the project, thereby minimizing erosion, sedimentation, dust generation, and other adverse environmental impacts. The plan also seeks to prevent the establishment and spread of invasive and noxious weeds, reduce fire hazards associated with unmanaged vegetation and excessive biomass, preserve existing desirable vegetation where feasible, and limit the need for extensive herbicide applications.

In addition, effective vegetation management supports a safer work environment by reducing hazards associated with unmanaged vegetation, including slips, trips, falls, restricted access, and exposure to insects and other nuisances. Through the implementation of these practices, the project aims to protect natural resources, enhance site safety and reliability, and address stakeholder and community concerns while supporting the long-term success of the solar facility.

The foremost objective of such planning and execution must be to establish desirable long-term ground cover as early in the project as possible to reduce and/or eliminate:

- Erosion, excessive dusting and sedimentation
- Invasive and noxious weed establishment and propagation
- Construction slips, trips and falls; bee stings, and other safety hazards due to unmanaged biomass and/or stemmy invasive/noxious weeds.
- Tree and other desirable vegetation removal.
- Extensive/frequent herbicide application.
- Fire hazards due to excessive/unmanaged biomass
- Stakeholder and community concerns.

Scope

The scope of this vegetation management plan will include soil composition testing, seed mixture design, soil nutrient amendments, pre-construction seeding, in construction activities and the maintenance phase during operations. Soil rejuvenation, including carbon capture and water infiltration optimization are especially critical considerations. To ensure sustained, long-term success requires ongoing vegetation monitoring and adaptive management practices.

Policy

Consumers Energy will minimize impacts to wetlands, streams, waterbodies, and drainage features identified through onsite investigation into the site design. Consumers Energy will optimize and maximize soil health, rejuvenation and water infiltration by leveraging vegetative carbon capture and sequestration.

Additionally, Consumers Energy will add vegetation in and around the Project Area to enhance the visual appeal of the Facility and further provide ecological benefits as well as providing visual buffers for adjacent residents.

All general and/or primary construction contractors shall create and submit to Consumers Energy a specific Construction Vegetation Management Plan. This approved plan shall be posted at the jobsite during the duration of construction.

Applicable local, state and federal laws, permit conditions and other requirements shall be met or exceeded and incorporated into this Vegetation Management Plan.

The vegetive management work plan should be flexible to adjust to any changing site conditions as they arise. The work plan shall take into consideration the anticipated growth of vegetation, combustion risk, and all other environmental factors that may have an impact on the safety and reliability of the project and surrounding areas. Any adjustments to the work plan shall be documented as they occur. Consumers Energy shall track adherence to the planned vegetation management work to ensure that it is completed according to specifications.

Project Surveys

Preliminary site and environmental permitting evaluations shall be performed for the project area. This evaluation will focus on the identification of possible environmental and permitting constraints associated with the development of the Facility. Following the completion of the preliminary evaluation, wetland and waterbody delineation, as well as a preliminary ecological assessment shall be conducted. These assessments will utilize Geographic information Systems (GIS) and site surveys to screen and classify potential environmental resources in the Project Area.

Soil fertility, type and depth assessments shall be conducted using a grid approach. Such assessments shall include testing of organic matter, micro/macronutrients, cat ion exchange capacity and pH. Existing vegetative species and communities shall be identified and considered.

Tree Clearing

Forested areas will be preserved where possible. Consumers Energy is committed to minimizing the tree clearing, where possible, and observing seasonal restrictions on tree clearing to protect sensitive species as conditions specify. Trees to be removed shall be cut as close to the ground as possible and removed. The associated tree limbs and brush will be burned, chipped, or otherwise disposed of as allowed under federal, state, and local regulations. As noted, as part of the Gustin Solar – Harrisville Township application and site plan, the project proposes to minimize tree removal to one half of an acre (0.5 ac) consisting of mostly individual trees avoiding any impacts to large stands of trees.

Other Native Vegetation Protection

Permanent impacts associated with the Facility will be limited to the area surrounding the Facility footprint. Protection of vegetation will be achieved by:

- Careful site planning
- Indicating limits of clearing on construction drawings

- Clearly staking/flagging limits in the field prior to the initiation of construction activities

Direct impacts to streams and wetlands will be avoided using overhead collection lines and HDD installation of underground collection lines, eliminating damage to wetland vegetation.

Examples of methods that may be utilized for the protection of vegetation in sensitive areas, as well as outside the designated clearing limits include:

- Preconstruction documentation of tree and planting condition
- Protection zone fencing
- Prohibitions on excavation or heat sources within relevant protection zones
- Erosion and sedimentation control

Final methods for vegetation management shall be included in construction documents. Means of limiting tree removal and protecting remaining vegetation will be reviewed with the contractor(s) at a pre-construction environmental training session and will be monitored by an on-site Environmental Monitor throughout the duration of construction.

Pre-Development/Construction Vegetation Management

Vegetative cover shall be maintained in advance of development and construction. Mechanical mowing and/or herbicide application shall be used as to avoid invasive/noxious species from reaching the lower of 18 inches in height or the height at which the species reproductive stage begins.

Seed Mix and Pre-Seeding

As with all Consumers Energy solar energy development projects, though minimal, grading of the Gustin Project development area will be completed prior to seeding or soil preparation activities being completed. Reasonable efforts shall be made to ensure that soil compaction is prevented and/or mitigated as appropriate.

Low Growth Vegetative Cover and/or Pollinator Mix Vegetative Cover and/or Carbon Optimizing Cover strategies and treatments may be selected for the entire site or sub-areas within the site. Seed mix to achieve the respective site/area strategy while minimizing mowing requirements may be optimized for specific conditions with pre-approval. Seed mixes shall be certified to be 99.99% weed free. In general, plant seed species that reach a mature height in excess of the minimum height of the solar panel leading edge design height (at full tilt) shall be minimized if not completely avoided. Seed shall conform to all applicable laws of the State of Michigan and seed shall be labeled according to the U.S. Department of Agriculture Federal Seed Act and shall be furnished in containers with tags showing seed mixture, purity, germination, weed content, name of seller, and date on which seed was tested. In general, broadcast seeding Shall Not be relied upon to be an efficacious means of seeding.

Additional seeding for disturbed areas is to be completed in phases, starting concurrently with site preparation. As each construction work area grading and topsoil spreading are completed, the permanent seed mix is to be applied. Installation by drilling into exposed soils is preferred for seed establishment but may include broadcasting at higher seed application rates – method to be approved by Consumers Energy.

Upon completion of the pile, tracker and solar panel installation, any areas which have been damaged (by

Contractor or others) or are otherwise not adequately established, shall be reseeded with permanent seed mix (Table 3). Reseeding during this phase shall include any soil grading, smoothing and preparation to repair the damage and to prepare the seedbed to be reseeded. Seedbed shall be prepared per this specification for areas that require reseeding.

Temporary seed mixes and/or cover crops may be used for short term soil stabilization and cover if approved by Consumers Energy. The cover crop may contain rye, wheat, or oats and/or other typical seed mixtures used for construction purposes.

Nutrient management soil amendment application, seedbed preparation and pre-seeding shall take place as soon as practical. Herbicide spraying may be planned, approved and executed by a licensed and trained applicator to assist with preventing the establishment and spread of invasive/noxious weed species.

Topsoil Restoration

Topsoil shall be reestablished and affected areas subsequently reseeded for areas where grading is necessary.

Management of Site Vegetation During Ongoing Operations and Maintenance

During the facility operation phase, Consumers Energy will manage the site vegetation. The frequency of mowing, spraying, pruning, fertilizing and/or other management methods will vary depending on the time of year and rainfall.

The primary objective of mowing is to keep the vegetation below one-and-one-half feet in height to avoid shading the solar panels. Onsite vegetation will be monitored for the establishment of noxious/invasive weeds. If noxious weeds are identified within the facility's fence line during operation, herbicide may be used. Herbicide use will be conducted by a licensed professional and will be applied in accordance with manufacturer instructions. Notably, designated pollinator areas will likely need periodic mowing until the desirable species are established enough to "choke" out noxious/invasive species.

Project area vegetation maintenance will be conducted by experienced personnel and/or contractors with all required certifications to perform the work as described above.

Regular vegetation maintenance will maintain proper function of the solar panels and ensure pleasing aesthetics. All required permits for construction and operation of the facility will be acquired prior to work. Consumers Energy will abide by all federal and state standards and laws applicable to the facility.

Mechanized and/or Robotic Mowing

Mechanical means of vegetation control shall minimize the risk of projectiles/flying objects, entanglement, and ignition sources. Flail mowers are preferred for this reason. Handheld brushing and line trimmers with non-metallic blades/cutters may be used in limited access areas.

Autonomous robotic mowing is still evolving. The current state of the art focuses on rechargeable electric rotary mowers that are monitored from the mower OEM's central control room.

Grazing and Agrivoltaics

Grazing of sheep as a means of maintaining vegetation at small demonstration scale solar farms has become somewhat abundant in the northeast United States. Small scale grazing has been demonstrated in the Midwest but has not yet been scaled to be cost effective for utility scale solar farms in the Midwest.

Likewise, the co-production of solar energy and agricultural produce and crops has been demonstrated across the United States but has not yet been scaled to be cost effective for utility scale solar farms in the Midwest.

Though Consumers Energy is not opposed to the use of sheep grazing as a vegetation management technique, such a management program is not currently being proposed for this project.

Collection Boxes and Inverters

Vegetation must not be allowed to grow within a two feet radius of collection boxes nor within a six foot buffer around inverters. These areas within the Gustin Solar project will be strictly maintained by mechanical means such as non-metallic line trimmers or other appropriate means.

Project Collector Substation and Balance of Plant

Vegetation will be removed from inside the project collector substation fence line. Gravel or similar noncombustible base shall be used. The Main Power Transformer will be located within the project collector substation and will have its own concrete containment base. Generation-Transmission line right of way will be kept clear of trees, brush and other combustible materials but for limited biomass as produced by desirable plant species and mowing there-of.

Wetlands

Wetlands shall not be disturbed directly or indirectly by vegetation management activities.

Monitoring and Fire Risk Mitigation

Consumers Energy team members will monitor the site vegetation monthly to ensure vegetation clearances and growth falls within the expected values. Scheduled vegetation maintenance activities may be updated based on these observations.

Monthly drought monitoring shall be a regular element of this vegetation management plan execution with increased frequency starting at the first concern/indication of drought risk such that more specific preventive plans and actions to limit dry biomass production and fuel availability can be taken.

Fire Breaks

All fire breaks will be 30 feet around any array block. All fire breaks, defined as a gap in combustible materials or maintained vegetation below 6 inches in height. Fire breaks shall remain free of all wood debris, trees and shrubs. Branches and limbs overhanging will be trimmed to 8 feet above the ground. Trees and dying growth outside the perimeter fence will be assessed to minimize fuel loading falling within the fire break. Site access roads, with a width of 20 feet or greater, will provide additional fire breaks. Vegetation will be maintained outside of the fence line as required to maintain the fire break.

Training

Each person accessing the site for vegetation management purposes will be provided with a comprehensive orientation before commencing any work at site. The material at a minimum will cover topics such as a general overview of the project, hazard analysis, emergency response, wildlife conservation training and vegetation management (as outlined in this document).

Contacts

The name(s) of those responsible for the site and their contact information shall be posted prominently at various locations around the perimeter of the site such that a lay person can readily find such information.

References

The following documents relate to this policy. Consult these documents for other applicable information.

- Optimizing Land Use for Ecosystem Services and Solar Power in Michigan, Masters of Science Program, School for Environment and Sustainability, University of Michigan April 23, 2024
- Michigan Pollinator Habitat Planning Scorecard for Solar Sites, Michigan State University Extension Service