

# Minnesota Public Utilities Commission

## Staff Briefing Papers

---

Meeting Date: August 24, 2017 ..... \*\* Agenda Item: #2

---

Company: Aurora Distributed Solar, LLC

Docket No. IP6928/CS-14-515

In the Matter of the Aurora Distributed Solar, LLC Site Permit for the 100 MW Solar Energy Project Located at Multiple Facilities in Minnesota

Issue(s): What action should the Commission take, if any, on the Aurora Distributed Solar Site Permit?

Staff: Tricia DeBleeckere | 651-201-2254 | [tricia.debleeckere@state.mn.us](mailto:tricia.debleeckere@state.mn.us)

---

### Background Documents

Commission – Order Issuing Site Permit as Amended ..... June 30, 2015  
Aurora Distributed Solar – AIMP and VMP ..... December 21, 2015  
Aurora Distributed Solar – IR Responses to PUC IR 1-6..... May 15, 2017  
Aurora Distributed Solar – Supplemental Response to IR1-2 (Due June 15, 2017) ... June 21, 2017  
Aurora Distributed Solar – IR Response to PUC IR 9-13 (Trade Secret) ..... August 2, 2017  
MN Dept. of Agriculture – Comments ..... August 10, 2017  
City of Annandale – Comments ..... August 10, 2017  
DOC EERA – Comments: Proposed Amendments ..... August 10, 2017  
MN Dept. of Natural Resources – Comments ..... August 10, 2017  
Aurora Distributed Solar – Reply Comments..... August 15, 2017

### Attached / Efiled

Aurora Distributed Solar - Compliance Tracker for Week Ending 7/27/2017  
Department of Agriculture – Weekly Report for 8/9-8/12/17  
Department of Agriculture – Weekly Report for 7/30-8/5/17  
Corina Township Comments August 14, 2017

The attached materials are work papers of the Commission staff. They are intended for use by the Minnesota Public Utilities Commission (Commission) and are based upon information already in the record unless noted otherwise.

This document can be made available in alternative formats (i.e., large print or audio) by calling 651-296-0406 (voice). Persons with hearing or speech disabilities may call us through their preferred Telecommunications Relay Service.

Table of Contents

I. Statement of the Issues ..... 3

II. Background ..... 3

III. Relevant Law ..... 3

IV. Project History ..... 4

V. Current Status ..... 7

VI. Comments ..... 8

    A. Minnesota Department of Natural Resources (MN DNR) ..... 8

    B. Minnesota Department of Agriculture (MDA) ..... 8

    C. City of Annandale ..... 9

    D. Department of Commerce, Energy Environmental Review and Analysis (EERA) ..... 9

    E. Corina Township ..... 10

IV. Aurora Reply Comments ..... 11

V. Staff Discussion ..... 12

VI. Commission Decision Alternatives ..... 15

---

**I. Statement of the Issues**

---

What action should the Commission take, if any, on the Aurora Distributed Solar Site Permit?

---

**II. Background**

---

In 2015, the Commission issued a site permit to Aurora Distributed Solar, LLC (Aurora) for the construction of the 100 MW distributed solar energy facility. The facilities have been under construction during 2016 and 2017, and have achieved commercial operation. The sites are currently being restored and revegetated.

Weekly inspection reports have been filed by the Department of Agriculture's inspector, however those inspections are mainly limited to issues associated with the Agriculture Impact Mitigation Plan (AIMP). These reports, combined with unanticipated weather related events, and alleged issues with the original construction contractor, caused issues for project development and caused in-service date delays. Commission staff has been monitoring these issues over the past two years and recently issued a notice of comment period in July 2017 on whether the site permit should be amended, whether additional inspection services should be utilized, and whether any other action should be taken.

Comments were received by Aurora and three state agencies addressing these questions; the commenters were generally in agreement that additional inspection services on behalf of the Commission would be reasonable and that the permit should be amended.

---

**III. Relevant Law**

---

The Commission issued the site permit in accordance with Minn. Stat. §216E and Minn. Rule 7850.

**Permit Conditions and Modification**

Pursuant to Minn. Rule 7850.4600, the Commission can impose permit conditions on a project as it deems appropriate and supported by the record. Additionally, pursuant to Minn. Rule 7850.4900, Amendment of Permit Conditions, the Commission may amend conditions upon the request of any person, or it may amend its original decision at any time upon notice and opportunity for hearing.<sup>1</sup>

**Amendment or Revocation**

Minn. Rule 7850.5100 allows the Commission to initiate action to consider revocation or suspension of a permit on its own motion or upon the request of any person who has made a prima facie showing that a violation of the permit has occurred.

---

<sup>1</sup> Minn. Stat. 216B.25

#### IV. Project History

---

On July 1, 2015, the Commission issued a site permit to Aurora for the construction of the 100 MW distributed solar energy facility. This permit was the first solar site permit issued by the Commission and the first (collective) distributed energy project issued by Commission.<sup>2</sup>

The permit authorized construction of up to 21 sites. Aurora acknowledged during the permitting process its intention to propose more sites than would be constructed to account for on-going additional site-specific studies; environmental survey results, and interconnection details. Aurora ultimately reconfigured sites to condense the project onto 16 sites while still achieving a 100 MW capacity.<sup>3</sup>

The Commission authorized construction at the following sites (bolded sites were ultimately constructed):

- |                      |                           |                         |
|----------------------|---------------------------|-------------------------|
| <b>1. Albany</b>     | <b>8. Lake Pulaski</b>    | <b>15. West Waconia</b> |
| <b>2. Atwater</b>    | <b>9. Lawrence Creek</b>  | <b>16. Chisago*</b>     |
| 3. Brooten           | 10. Lester Prairie        | <b>17. Dodge Center</b> |
| <b>4. Eastwood</b>   | <b>11. Montrose</b>       | <b>18. Paynesville</b>  |
| 5. Fiesta City       | 12. Scandia               | <b>19. Pine Island</b>  |
| <b>6. Hastings</b>   | <b>13. Waseca</b>         | <b>20. Annandale</b>    |
| <b>7. Lake Emily</b> | <b>14. West Faribault</b> | 21. Mayhew Lake         |

Construction of the facilities was completed on varying dates in 2016 and 2017. The facilities are currently operational and are all in restoration stages. Table 1, attached to this paper, provides an overview of the anticipated and actual Commercial Operation Dates of each of the locations.

The Site Permit issued by the Commission directed Aurora to:

- Use construction practices and materials set forth in Aurora's permit application;
- Convene meetings with EERA and Commission staff, designate field representatives to oversee compliance at each site, and prepare various plans for avoiding and mitigating foreseeable problems; and,
- Prepare site plans, including site layouts and landscaping plans.

Additionally, the Commission required Aurora to prepare and file an Agricultural Impact Mitigation Plan (AIMP) at Site Permit Condition 6.4 and Vegetation Management Plan (VMP)

---

<sup>2</sup> Staff notes that this project will likely be the only multiple site project permitted by the Commission; the statute governing the definition of a 'single site' was amended and expanded before the Aurora application was filed. Prior to the modification, the Aurora distributed energy project would have been permitted locally by the individual counties, however, due to the statute modifications, the multiple projects sites became eligible to be permitted as one, at the state level (Commission).

<sup>3</sup> Commission Order Issuing Site Permit as Amended, June 30, 2015, pg. 3.

at Site Permit Condition 6.5. An AIMP was filed by Aurora on December 21, 2015 and later approved by the Commission. As part of the AIMP, Aurora was required to retain of an Agricultural Monitor and use of Environmental Monitors as follows (text from the AIMP):

### **2.3 Agricultural Environmental Monitor**

An Agricultural Environmental Monitor (Agricultural Monitor) shall be retained and funded by Aurora for the purposes of providing third-party review of the AIMP/VMP through construction and post-construction stabilization of vegetated areas. The Agricultural Monitor will serve to ensure the long-term agricultural feasibility of the sites is maintained. The Agricultural Monitor will not have the authority to direct the contractor regarding construction activities, but they will have authority to request that Aurora's EM stop construction if the Agricultural Monitor believes a compliance issue has been identified. The Agricultural Monitor will have full access to project facilities and will have the option of attending meetings where construction is discussed. Specific duties of the Agricultural Monitor will include, but are not limited to the following:

1. Participate in preconstruction training activities sponsored by Aurora.
2. Monitor construction and restoration activities for compliance with provisions of this AIMP/VMP.
3. Report instances of noncompliance with the AIMP/VMP to Aurora's EM and Field Representative.
4. Prepare periodic compliance reports to the DNR and the MDA.
5. Coordinate communication of Landowner concerns to the DNR and the MDA if necessary, although this will be typically handled by the Field Representative.
6. Maintain a written log of Landowner concerns reported to the Agricultural Monitor regarding compliance with this AIMP/VMP. The written log should record when the AGMONITOR reported each logged concern to the DNR and MDA.
7. Be responsible for determining whether weather conditions have caused the soil to become so wet that the activity to alleviate compaction would reduce the future production capacity of the land and advising Aurora's Environmental Monitors of these conditions. Aurora will be solely responsible in making the decision on whether it will proceed with construction under these conditions. Compensation for Landowner, as appropriate, will be determined as described in the "Procedures for Determination of Damages and Compensation" section of this AIMP/VMP.
8. In disputes between Aurora and a Landowner over restoration, advise the Aurora Field Representative and follow the complaints resolution procedure.

#### **Qualifications and Selection of the Agricultural Monitor**

The Agricultural Monitor selected for the project will have sufficient relevant education and demonstrated practical experience with electric power generation facility construction, redevelopment and restoration of agricultural land. The

resume/qualifications of the Agricultural Monitor will be submitted to PUC, MDA, and DNR upon request for approval prior to construction.

#### Aurora Environmental Monitor

In addition to the Agricultural Monitor, Aurora will utilize, through its Health, Safety, and Environmental Quality Program, Environmental Monitoring (EM) staff responsible for ensuring compliance with all applicable regulations including any permits and approvals. Aurora will provide Health, Safety, and Environmental Quality Program, staff to serve as the Environmental Monitors (EM) for the Project, responsible for ensuring compliance with all applicable regulations including any permits and approvals.

The Aurora EM will:

1. Be full-time members of the Aurora inspection team.
2. Be responsible for verifying Aurora's compliance with provisions of this AIMP during construction (as well as other site permit requirements).
3. Work collaboratively with other members of Aurora's construction team and Aurora's Field Representative in achieving compliance with this AIMP.
4. Observe construction activities on project facilities on a regular basis.
5. Have the authority, after consultation with the construction manager, to stop construction activities that are determined to be out of compliance with provisions of this AIMP.
6. Document instances of noncompliance and work with construction personnel to identify and implement appropriate corrective actions as needed.
7. Ensure that any complaints or disputes relative to this AIMP/VMP are documented in the Complaint Reporting Procedure
8. Provide construction personnel with training or review training materials associated with provisions of this AIMP before construction begins.
9. Should the EM determine that, due to wet conditions, continued construction activity would result in damage to the future production capacity of the land included in the construction area, the EM may request temporarily cessation of the construction activity in a specific area or site until the EM consults with supervisory personnel of Aurora.

Shannon Kulseth of Native Range Resources, through HDR Engineering, was retained for the position of Agricultural Monitor. She has submitted reports to the Department of Agriculture and Aurora since the commencement of construction. These reports have been helpful to Commission staff in tracking issues experienced on site.

Barr Engineering was retained as the Environmental Monitor. This position worked closely with Aurora on inspection services and assisted in writing Aurora's weekly status reports.

Largely through the comprehensive inspection notes provided by the Agricultural Monitor, staff became aware on on-going project issues. Additionally, reports of non-compliance with wetland and SWPPP provisions were later issued by the MPCA for differing issues. During the

course of 2016, it was unclear to staff what the cause of some of the onsite issues were stemming from, however, now, Enel and its subcontractor at the time - Biosar, are in litigation over work conducted on the sites.<sup>4</sup> Through other informal channels, staff was informed of other project concerns related to construction, installation, and environmental practices. None of which were able to be substantiated as there was not an environmental inspector present onsite, on behalf of the Commission.

In 2017, Aurora and Enel brought on a new construction contractor to complete work on the project. Staff has again monitored progress on the sites through the Agricultural Monitor Inspection Reports.

## V. Current Status

---

From the Agricultural Inspector reports submitted in 2016 and resulting issues that carried over into 2017, staff continued to have concerns regarding the issues onsite. Many construction and environmental issues experienced in 2016 still needed remediation or correction, or caused issues continuing into in 2017 (for example the lack of use of designated roadways on the sites caused increased compaction and in turn, has caused issues with vegetation establishment). Staff issued a series of information requests (IRs) in May through August 2017, seeking to obtain additional information on project status, requesting additional clarity in inspection-discovered issue resolution, requesting improved reporting practices, among other issues. The IR responses are included as relevant documents to this briefing paper.<sup>5</sup>

Additionally, staff was informed that the Environmental Monitor (Barr Engineering) was terminated as of June 30, 2017. Since that time, SWPPP inspections have been conducted by Aurora personnel, trained by Barr. However, as those personnel are not technically the 'Environmental Monitor' staff had concerns as to whether their qualifications are sufficient to be performing these inspections and concerns whether there were other environmental issues that may not be properly addressed by a person not largely trained to conduct this type of work. As a result, staff issued a notice of comment period in July 2017 asking whether the:

- 1) AIMP or VMP should be modified in response to issues outlined in the inspection reports;
- 2) Commission should require a third party environmental monitor on its behalf (similar to the North Star and Marshall projects);
- 3) Commission should limit the site permit to the 16 constructed sites; and,
- 4) Commission should take any other action in regard to the Site Permit, such as additional amendments or revocations.

---

<sup>4</sup> Star Tribune [Article](#), July 14, 2017.

<sup>5</sup> [May 15, 2017 Aurora IR Response](#)

---

**VI. Comments**

---

**A. Minnesota Department of Natural Resources (MN DNR)**

The MN DNR commented that it did not believe the AIMP or VMP needed to be amended at this time for the constructed sites. It noted that most of the issues Aurora faced were due to unanticipated weather events and ‘poor site selection’.

The MN DNR supported the retention of a third-party independent inspector to ensure the project conforms to the site permit requirements and had no recommendation regarding reporting intervals.

The MN DNR made recommendations relating to vegetation monitoring (establishment and maintenance phases) for the Aurora Solar Project, specifically, the MNDNR recommended individual site mapping for vegetation establishment and weed monitoring and the use of photo documentation to record progress and trouble areas. For the maintenance phase, the MN DNR suggested additional controls on monitoring and timelines for when monitoring will occur (the DNR suggested use of BWSR’s assessment form).

Additionally the MN DNR provided guidance for the future siting of solar facilities (presumably for the Commission’s consideration in future siting applications) and additional future construction considerations.<sup>6</sup>

**B. Minnesota Department of Agriculture (MDA)**

The MDA made several recommendations for AIMP revisions. Specifically the MDA recommended that the AIMP and VMP be modified to include:

- Robust personnel training program (largely post-construction);
- Minimum required qualifications for individuals serving in the Environmental Monitor role (those should include: stormwater erosion and sediment control, knowledge of agricultural fields and drain tiles, environmental monitoring of heavy construction activities, implementation of construction best management practices, familiarity of vegetation being established, and restoration of construction sites);
- Provisions for independent monitoring post-construction and post-restoration;
- Provisions for operation and maintenance should include compliance with the AIMP construction and restoration provisions as necessary;
- References to landowners in the AIMP should be reexamined and adjusted as it assumes the landowners are not the project developers (as is the case here);

---

<sup>6</sup> Staff notes that the MN DNR guidance for future siting consideration and construction practices is informative and Commission staff encourages the MN DNR to continue to participate in future Commission permitting processes.



- Additional detail on the establishment of vegetation in the years following construction and restoration; and,
- Requirements to accurately locate and restore drain tile.

Additionally the MDA supported the addition of an independent Commission inspector as the MDA noted that instances of non-compliance with the Commission's Site Permit that were beyond the scope of the AIMP/VMP and an independent monitor would fill those gaps.

### **C. City of Annandale**

The City of Annandale commented and noted that pursuant to a settlement agreement between itself and Aurora, it required that Aurora install a vegetation screen to mitigate visual impacts from the solar array on adjacent properties. The trees were installed but did not establish and need to be replaced. Additionally, the City is concerned with the amount of noxious weeds onsite.

The City supports the addition of an independent environmental monitor and believes the inspector should be retained for the life of the permit. Additionally, the City noted its concern about the level of security available to restore the various sites upon permit termination.

### **D. Department of Commerce, Energy Environmental Review and Analysis (EERA)**

The EERA provided comment and agreed that to ensure provisions of the permit and the AIMP are followed: the AIMP/VMP needs modification, use of an independent environmental monitor would be beneficial, and continued engagement of the Agricultural Monitor is important.

#### *Use of an Inspector on Behalf of the Commission*

EERA noted that the original AIMP language was designed for a pipeline project, in which most land is privately-owned (and not by the developer, as is the case here) and that a landowner can seek redress for damages to their property. EERA noted that the role of the inspector is ever more important here to ensure damages are addressed (as Aurora is the owner of most parcels and would not claim damages against itself to the Commission). At page 5, the EERA noted:

To some degree, the [third-party, MDA-] Agricultural Monitor's reporting has initiated action by Aurora or its contractors to correct damage and change construction practices to prevent future damage. It is unclear how effective Aurora's internal environmental monitors were in ensuring adherence to the provisions of the AIMP.

EERA noted that while construction issues communicated to project manager and the construction contractor, resolution of identified issues was inconsistent and often delayed. For this reason, EERA recommended that use of a third party environmental monitor be elevated to

a permit condition. EERA provided a modified version to the language used in the Marshall Solar and North Star Permits:

Independent Inspector: The Permittee shall retain an independent third-party inspector. The selection of the inspector and scope of the inspection effort shall be approved by the Department of Commerce and Commission's Executive Secretary. The inspector shall monitor the construction and restoration process and ensure that the project conforms to the site permit terms, conditions, and the specifications outlined in the record. The inspector shall file reports at 30-day intervals with the Commission addressing compliance during construction and ~~restoration~~ through the Permittee's submission of the Notice of Termination of the National Pollutant Discharge Elimination System construction permit at all sites.

#### *Drain Tile*

EERA discusses the issues surrounding the damage to drain tile, but since construction is largely complete, and restoration phases are likely not going to further damage drain tile, further modifications to these sections are not necessary. However, EERA's comments provided guidance for future AIMP's regarding the identification and location of drain tiles.

#### *Site Permit Amendment – Number of Sites*

EERA recommended modifications to the number of sites authorized for construction in the permit, and recommended removal of the Brooten, Fiesta City, Lester Prairie, Mayhew Lake and Scandia sites. EERA provided the specific location where the permit text should be amended to restrict the permit to the 16 constructed sites (the cover sheet, Section 1.0, 2.0, and 3.0.)

### **E. Corina Township**

Corina Township filed comments in a similar vein as the City of Annandale. Corina Township provided photo documentation of the Annandale site, and expressed concern about the condition of the Annandale site in regard to the trees that did not establish, noxious weeds, loose wires and a damaged stop sign.

*Staff notes that these comments were received via mail during the reply comment period and Aurora did not have the opportunity to respond to these comments during the reply period.*

#### **IV. Aurora Reply Comments**

---

Aurora provided reply comments to all four comments received by the close of the initial comment period, and it largely agreed with all commenters' recommendations. Aurora noted that:

Remaining construction-related activities are limited to punch-list construction items and restoration activities, including permanent seeding and landscaping, drain-tile repair, and soil and erosion control activities. Major soil disturbance activities such as electrical cabling installation and road construction are complete. Accordingly, any changes made to the AIMP should focus on those restoration activities and vegetative maintenance activities to help ensure the long term success of the permanent vegetation currently being planted and established at each of the facilities.

Aurora noted it is supportive of the additional permit requirement to require an environmental inspector, and the language proposed by DOC EERA staff. Aurora agreed to almost all comments suggested by the agencies and the City of Annandale.

Like the EERA, Aurora suggested that the use of a Commission Environmental Inspector would facilitate compliance and outcomes suggested by the agencies and the City. Specifically, Aurora agreed to the following requests of the commenters:

1. Use of a third party environmental inspector on behalf of the Commission.
2. The development of a robust personnel training program for persons (contractors and subcontractors) involved in restoration or operation and maintenance phases.
3. Minimum requirements for environmental monitors as outlined by the MDA.
4. The additional requirement for independent monitoring of the project sites post-construction and post-restoration or for any future repair or maintenance activities that could damage vegetation, soils, or drain tiles.
5. Compliance with the AIMP should be required during repair or maintenance activities that could damage vegetation, soils, or drain tiles.
6. The use of photo documentation to ensure restoration progress.
7. Additional information should be provided to establish benchmarks for restoration success, Aurora committed to working with the DNR to conduct its work consistent with their recommendations.
8. Use of the BWSR assessment forms during revegetation.
9. Development of a site specific maintenance plans for each location.
10. Several trees at the Annandale site need to be replaced, Aurora has written assurances with the City that those trees will be established. Aurora plans to replace the trees later this year.
11. Continued management of noxious weeds consistent with its permit requirements.

There were three areas in which Aurora did not agree with a commenter. First, Aurora did not agree with the MDA request that the AIMP be amended to address issues where damages were

required to be reported by the landowner. Aurora agreed with the EERA staff that utilization of a third party monitor by the Commission would assure compliance with the AIMP and Site Permit (in lieu of a non-existent landowner claiming damages).

Second, Aurora did not agree with the MDA suggestion that drain tiles should be located during the restoration process for future use and work. Aurora noted that it was in the process of restoring any onsite or adjacent landowner drain tile issues and will continue to do so. Any future damaged drain tile will be repaired as required by the site permit. Aurora agreed with the DOC EERA, that the existing language was sufficient.

Third, Aurora did not agree that the Commission Environmental Inspector should be retained through the life of the permit. Aurora noted it did agree with the EERA that the Commission Environmental Inspector should be retained 'through at least this season of restoration' as Aurora believes that restoration would be completed at the end of this year. Therefore, Agricultural Inspection services could also terminate at that time.

Aurora agreed to amend the AIMP and to provide a revised AIMP to the Commission and EERA staff for review and approval.

## **V. Staff Discussion**

---

Staff has reviewed the record and the past report and agrees with commenters that first and most importantly, a Third-Party Environmental Inspector working on behalf of the Commission (Commission EI) is the most reasonable next step. Staff believes ensuring that a Commission EI can get onto the project sites in a timely manner (and preferably by the end of August, if not immediately following Labor Day) to assess compliance with past, on-going and future work conducted onsite is paramount.<sup>7</sup>

Staff believes the language used in previous permits and modified by the EERA is reasonable, but suggests modifications:

Environmental Inspector: The Permittee shall retain an independent third-party inspector. The selection of the inspector and scope of the inspection effort shall be approved by the Department of Commerce and Commission's Executive Secretary.

The inspector shall monitor any construction, restoration, or other work and ensure that the project conforms to the site permit terms, conditions, and the specifications outlined in the record. Initially, the inspector shall file one report per site one report per site within 30 days of initiation of inspections that documents any current issues relating to compliance with the Site Permit, the AIMP or VMP, or any other relevant

---

<sup>7</sup> Staff has issued an IR, with responses due prior to the Commission Agenda Meeting on August 24, asking Aurora to outline timeframes and/or barriers to bringing on an inspector on in an expedited timeframe. The response to that IR may inform the Commission's decision on this matter.

law. Proposed corrective measures should be outlined for issues found and any timeframe in which they need to be completed by to ensure no further harm or issues arise. Any issues that are beyond the scope or ability of the inspector to provide corrective measures should be noted for further review by Commission staff. After the initial assessment of each site, the Commission EI should file monthly reports at 30-day intervals (or as otherwise agreed upon by the Commission) to the Commission addressing compliance during construction and restoration, or any other issues deemed appropriate. The inspector should communicate as needed with Commission staff or other agencies.

Any violations of the AIMP, VMP, Site Permit or other law not found by the inspector do not absolve the company from compliance or corrective actions needed, compliance is sole responsibility of the company.

Termination or modification of these reports and inspections and the interval in which they are conducted, or modification of this permit condition will and can be authorized by the Executive Secretary upon request of the Commission staff, the Commission EI or upon petition by Aurora.

Inaction on the part of Aurora to meet intervals for corrective action as outlined by the Commission EI may be grounds for Site Permit suspension or termination, or other action, in accordance with statute and rule.

Staff has modified the language suggested in the comment period notice and from the EERA recommended language as staff believes that termination of the inspections should be a decision made by the Commission's Executive Secretary and not dependent on a filing made by Aurora to another agency. Additionally staff believes that the scope of work resulting from the inspections by the Commission EI is unknown. Due to this, staff believes significant flexibility should be afforded in the permit condition to account for either a large or small level of effort and time.

Staff also recommends the Commission require the following regarding additional requirements of Aurora and inspection services:

- 1) Aurora shall work with Commission staff and EERA to retain a Commission EI to be onsite by September 5, 2017. Any unauthorized delay to this schedule shall be requested from (for due cause) and approved by the Commission's Executive Secretary in a timely manner. Any delay to this schedule may subject Aurora to enforcement action by the Commission and/or suspension or termination of the site permit as allowed for by law.
- 2) The Commission EI shall be retained and conduct its work under the terms and agreements approved by the Commission's Executive Secretary. The Commission EI shall be retained until authorized to terminate its work by the Commission's Executive

Secretary. The termination of work may be requested to be approved by the Commission's Executive Secretary by Commission staff, the Commission's EI, or upon petition by Aurora.

- 3) Require Aurora to work with Commission and EERA staff to timely execute a Master Services Agreement with an inspection services company, a Memorandum of Understanding on the roles and responsibilities of the inspector and the scope of work. Any delay in executing these steps may subject Aurora to enforcement action by the Commission and/or suspension or termination of the site permit as allowed for by law.
- 4) Aurora shall file a revised draft AIMP (or VMP as needed) by September 29, 2017 incorporating the agreed upon modifications and other necessary modifications:
  - Inclusion and information regarding the use of Commission EI;
  - The requirements for on-going monitoring for any work that may damage vegetation, soils, or other environmental issues pertaining to the AIMP, VMP or Site Permit; and,
  - Training protocols for personnel working on on-going work throughout the life of the project.

Modifications to drain tile provisions and landowner/ownership are not necessary at this time. The AIMP (and VMP is needed) will be reviewed, potentially modified, and approved by the Commission's Executive Secretary. The review and approval of this AIMP should not hold or delay the execution or implementation of the Commission EI inspections.

- 5) Aurora shall file training protocols for future maintenance and restoration contractors by October 27, 2017.
- 6) Aurora shall develop with the MN DNR and the EERA and file by October 27, 2017:
  - a plan with the MN DNR regarding on-going monitoring protocols as requested by the MN DNR, and,
  - Site specific maintenance plans.

The on-going monitoring protocols and site specific maintenance plans will be reviewed, potentially modified, and approved by the Commission's Executive Secretary.

- 7) Authorize the Commission's Executive Secretary to modify any of these ordering points, or other on-going inspection and compliance related authorization or requirements, any contracting provisions (MSA, MOU, Scope of Work) as needed to ensure compliance and timely adherence to environmental, construction, safety laws or requirements.

Last, staff agrees with the EERA that modification of the site permit to remove the following sites from the Site Permit are reasonable: Brooten, Fiesta City, Lester Prairie, Mayhew Lake and Scandia.

## VI. Commission Decision Alternatives

---

*Staff recommends decision options 2-6.*

### **Amendment, Suspension or Revocation, or Enforcement Action of the Site Permit**

1. Initiate revocation or suspension proceedings pursuant to 216E, providing notice of the grounds for revocation or suspension.
2. Refer the matter to the Office of the Attorney General for further investigation.
3. Amend the Site Permit to limit the permit to the sites constructed, as recommended by the DOC EERA.
4. Amend the Site Permit and add a permit condition relating to the use of a Commission Environmental Inspector. Any scope of work approved by the Executive Secretary will supersede this permit condition.

Environmental Inspector: The Permittee shall retain an independent third-party inspector. The selection of the inspector and scope of the inspection effort shall be approved by the Department of Commerce and Commission's Executive Secretary.

The inspector shall monitor any construction, restoration, or other work and ensure that the project conforms to the site permit terms, conditions, and the specifications outlined in the record. Initially, the inspector shall file one report per site within 30 days of initiation of inspections that documents any current issues relating to compliance with the Site Permit, the AIMP or VMP, or any other relevant law. Proposed corrective measures should be outlined for issues found and any timeframe in which they need to be completed by to ensure no further harm or issues arise. Any issues that are beyond the scope or ability of the inspector to provide corrective measures should be noted for further review by Commission staff. After the initial assessment of each site, the Commission EI should file monthly reports at 30-day intervals (or as otherwise agreed upon by the Commission) to the Commission addressing compliance during construction and restoration, or any other issues deemed appropriate. The inspector should communicate as needed with Commission staff or other agencies.

Any violations of the AIMP, VMP, Site Permit or other law not found by the inspector do not absolve the company from compliance or corrective actions needed, compliance is sole responsibility of the company.

Termination or modification of these reports and inspections and the interval in which they are conducted, or modification of this permit condition, will and can be

authorized by the Executive Secretary upon request of the Commission staff, the Commission EI or upon petition by Aurora.

Inaction on the part of Aurora to meet intervals for corrective action as outlined by the Commission EI may be grounds for Site Permit suspension or termination, or other action, in accordance with statute and rule.

### **Additional Reporting Requirements**

5. Require the following:

- Aurora shall work with Commission staff and EERA to retain a Commission EI to be onsite by September 5, 2017. Any delay to this schedule shall be requested from (for due cause) and approved by the Commission's Executive Secretary in a timely manner. Any unauthorized delay to this schedule may subject Aurora to enforcement action by the Commission and/or suspension or termination of the site permit as allowed for by law.
- The Commission EI shall be retained and conduct its work under the terms and agreements approved by the Commission's Executive Secretary. The Commission EI shall be retained until authorized to terminate its work by the Commission's Executive Secretary. The termination of work may be requested to be approved by the Commission's Executive Secretary by Commission staff, the Commission's EI, or upon petition by Aurora.
- Require Aurora to work with Commission and EERA staff to timely execute a Master Services Agreement with an inspection services company (as needed), a Memorandum of Understanding on the roles and responsibilities of the inspector and a scope of work. Any delay in executing these steps may subject Aurora to enforcement action by the Commission and/or suspension or termination of the site permit as allowed for by law.
- Aurora shall file a revised draft AIMP (or VMP as needed) by September 29, 2017 incorporating the agreed upon modifications and other necessary modifications:
  - Inclusion and information regarding the use of Commission EI;
  - The requirements for on-going monitoring for any work that may damage vegetation, soils, or other environmental issues pertaining to the AIMP, VMP or Site Permit; and,
  - Training protocols for personnel working on on-going work throughout the life of the project.

Modifications to drain tile provisions and landowner/ownership are not necessary at this time. The AIMP (and VMP if needed) will be reviewed, potentially modified, and approved by the Commission's Executive Secretary. Review and approval of this AIMP should not delay the execution or implementation of the Commission EI inspections.



- Aurora shall file training protocols for future maintenance and restoration contractors by October 27, 2017.
- Aurora shall develop with the MN DNR and the EERA and file by October 27, 2017:
  - a plan with the MN DNR regarding on-going monitoring protocols as requested by the MN DNR, and,
  - Site specific maintenance plans.

The on-going monitoring protocols and site specific maintenance plans will be reviewed, potentially modified, and approved by the Commission's Executive Secretary.

6. Authorize the Commission's Executive Secretary to modify any of these ordering points, or other on-going inspection and compliance related authorization or requirements, any contracting provisions (MSA, MOU, Scope of Work) as needed, and at any time, to ensure compliance and timely adherence to environmental, construction, safety laws or requirements.

**Staff recommends decision options 2-6.**

**Table 1. Final Commercial Operation Dates provided in Aurora's May 15, 2017 response to PUC Staff IR1.<sup>8</sup>**

<i>Site</i>	<i>Anticipated COD<sup>1</sup></i>	<i>3/8/2017 Update<sup>2</sup></i>	<i>Final COD Date<sup>3</sup></i>
1. Albany	12/17/2016	4/4/2017	25-Apr-17
2. Annandale	1/20/2017	3/21/2017	26-Apr-17
3. Atwater	12/11/2017	3/30/2017	27-Apr-17
4. Chisago	11/10/2016	Online 12/27/2016	23-Dec-16
5. Dodge Center	12/1/2016	3/18/2017	02-May-17
6. Eastwood	12/28/2016	4/5/2017	02-May-17
7. Hastings	12/10/2016	4/10/2017	02-May-17
8. Lake Emily	TBD	Online: 3/27/2017	26-Apr-17
9. Lake Pulaski	TBD	Online: 3/21/2017	26-Apr-17
10. Lawrence Creek	11/21/2016	3/14/2017	28-Mar-17
11. Montrose	12/8/2016	4/4/2017	25-Apr-17
12. Paynesville	TBD	6/17/2017	TBD
13. Pine Island	12/16/2016	3/28/2017	9-May-17
14. Waseca	TBD	6/17/2017	TBD
15. West Faribault	12/28/2016	4/5/2017	01-May-17
16. West Waconia	12/28/2016	6/9/2017	TBD

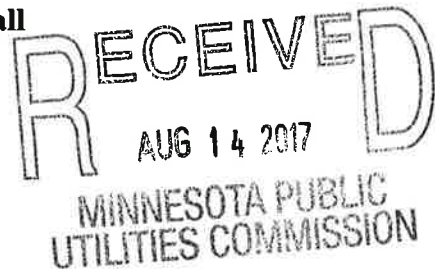
<sup>8</sup> Footnote 1: Anticipated COD based on contractor provided schedule, Footnote 2: Updated COD based on date of site energization and independent engineer certification, Footnote 3: Final COD based on issuance of acceptance letter by the utility.

# CORINNA TOWNSHIP

County of Wright  
9801 Ireland Avenue NW  
Annandale, MN 55302  
(320) 274-8049 – Town Hall

AUGUST 11, 2017

Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101



RE: Aurora Distributed Solar, LLC- Docket GS-14-515

Corinna Township submits this letter in response to the Notice of Comment Period issued on July 13, 2017 regarding the Site Permit issued to Aurora Distributed Solar, LLC. This is specifically in regard to the Annandale site located in Corinna Township.

Photographs of the site are included. They show the run-down condition of the property. Corinna Township was assured that the property would be kept in immaculate condition. Corinna Township prides itself on the upkeep of the properties within the Township. This site is an eyesore, with dead trees, tall, possibly noxious weeds, a crumpled up stop sign, and loose wires.

If there are any questions regarding these concerns I can be reached at 320-274-8049.

Sincerely,

For the Town Board,

A handwritten signature in cursive script that reads "Mary B. Brown".

Mary Barkley Brown  
Clerk













Aurora Compliance Tracker - Week Ending 7/27 (eFiled on 7/27/17)

Facility	Item #	Date Obs	AIMP Issues	Contractor Resolution	Date Completed	Verified By	Date Verified	Ag Monitor Comments
Albany	AL040802	4/8/2017	Central drainage ditch sides remain unstabilized and sediment deposition into the culvert is increasing.	Update: 7/11/17-Slopes and bottom ditch have established enough cover. After speaking with Shannon said it would be good. Update: 6/14/17 Sides have been stabilized with blankets, all that remains is the bottom. Area of concern is currently underwater. Once drainage ditch dries up, ditch will be cleaned out, seeded, and a blanket placed over to prevent further deposition. Under review for corrections addressed / corrective measures	11-Jul-17			Ditch was partially stabilized as of the 6/6/2017 inspection, further work expected during restoration.
Albany	AL040801	4/8/2017	Recoverable amounts of sand on top of topsoil are present in several locations, primarily along access roads and where sand was used to fill combiner trenches.	Update 7/11/17-Final seed has occurred and areas of concern were explained in detail to MNL. They are ripping along the roads and areas were potential concerns are. Site will be monitored for growth and remediated if needed. Update:6/14/17 Temporary seeding has occurred on site. Areas affected by the sand to fill trenches or on topsoil will be monitored. Where coverage does not establish, measures will be taken in order to facilitate growth. To be addressed as part of site restoration	JN 06/07			Most sand had been removed from soil surface as of the 6/6/2017 inspection.
Albany	AL051601	5/16/2017	Noxious Weeds: Canada thistle plants were observed in a few small patches. Plants were in the bolt stage and are expected to flower and set seed within a week to ten days depending on weather.	Update 6/27/17- Site has been sprayed twice. Will continue to monitor and spray as needed. Update 6/14/17 Second round of spray to occur on 6/16/17 Currently working with contractor to begin weed control weather permitting. Spraying scheduled for 6/7/17.	Spraying JN 06/27	Shannon Kulseth	6-Jul-17	Canada thistle has been well controlled on the site at this point, no new patches have been observed at this time.
Albany	AL052601	5/26/2017	Minor amounts of construction waste are being exposed as MNL crews perform seed bed preparation.6/6/2017 UPDATE: Fabric and large rock were pulled up during ripping of the laydown yard; fabric should be disposed of, and rock that is large enough to interfere with restoration equipment removed.	Update: 6/14/17 EGP supervisor has worked with contractor to complete areas of concern. Pictures of before and after are available.	JN 06/07	Shannon Kulseth	6-Jul-17	Waste materials were sufficiently removed from laydown yard area.
Annandale	AN051701	5/17/2017	Noxious weeds: Canada thistle plants are beginning to bolt; flowering and subsequent seed set are likely within a week to ten days depending on weather.	Update 6/14/17 MNL has completed a second round of spraying (6/12/17). Site will continue to be monitored for regrowth and sprayed as needed. MNL onsite 5/26/2017 for 5.5 hours spraying weeds where terrain was dry enough to operate equipment. Further spraying scheduled as needed	Sprayed AJ 05/26 being mowed ZE 06/07	Shannon Kulseth	15-Jun-17	Site has been sprayed, thistle plants are showing signs of wilt. Large vegetated area on the south/southwest portion of the site has also been mowed.
Annandale	AN051702	5/17/2017	Sediment controls on the west end of the wetland are in need of repair; this has been noted previously but is nearing a critical point to keep sediment out of wetland in the case of a large rain event.	Update 6/14/17 Meeting between MNL, BARR, and EGP ocured 6/12/17. Currently the growth on the slope should be sufficient to slow erosion in the areas noted. MNL currently on site seeding and will till, seed, and hydro mulch remaining slopes in order to keep erosion from re-occurring. Erosion points where undermined silt fence or biologs have taken place will be covered with topsoil, seeded, and hydro mulched as well. Additional rows of silt fence will be left in place until higher elevation of site has been stabilized. Once that has occurred, remediation will occur in the area of redundant silt fence. Under review for corrections / corrective measures. MNL on site actively repairing SWPPP/BMP's, erosion control measures being implemented, final seeding in progress.		Shannon Kulseth	1-Jun-17	Additional rows of silt fence were added to the area, bringing the total number of redundant rows to 20. A more effective strategy focused on erosion control rather than just sediment control should be implemented during final restoration.
Annandale	AN070601	7/6/2017	Canada thistle plants are re-emerging on the west end of the site.	Update 7/11/17Site has been sprayed twice. Thistle emerging is in patches and will be taken care of during SWPPP/AIMP remediation visits.				
Annandale	AN061501	6/15/2017	Silt fencing is being incompletely removed in some areas; un-staked siltfence installed by MNL in 2016 is being ripped off at ground level, leaving buried portions of the fencing in place.	Update:7/11/17- Silt fence still remains- item has been addressed several times and will continue to be until item has been remediated. 06/20: removed and addressed by MNL				
Annandale	AN061502	6/15/2017	Erosion gully along the northern edge of the central wetland continues to widen, causing loss of topsoil.	Update 6/29/17- erosion are beneath wetland is being addressed and proposals being made. Update to follow once proposal from contractors announced.. 06/20: cleaned up and addressed by MNL		Shannon Kulseth	6-Jul-17	Gully was filled in and smoothed. No new erosion control has been reinstalled in the area; should erosion occur again a new record will be created.
Atwater	AT042001	4/20/2017	Rutting and damage to erosion control by vacuum truck traveling across the site.			Shannon Kulseth	1-Jun-17	Previously rutted areas on slope have been smoothed and additional sediment control devices installed.
Atwater	AT051001	5/10/2017	Rutting and mucking across much of the site.			Shannon Kulseth	1-Jun-17	The majority of the site has been smoothed and temporary vegetation (oats) seeded.
Atwater	AT051002	5/10/2017	Junction box excavations were filled with sand; no topsoil is readily available to cap excavations.			Shannon Kulseth	17-May-17	Areas between arrays were scraped to obtain topsoil that was then used to cap junction box excavations. Topsoil capping appears to be sufficient to support final vegetation.
Annandale	AN053101	5/31/2017	Possible damage to drain tile; area along north side of access road continues to remain inundated. Water will inhibit revegetation of this portion of the site.	Update 7/11/17- Hodgmena has been fixing other sites with the same concerns and should be following back up with this site in the near future. Dates to follow as they are scheduled. Update 6/27/17- Hodgeman has visited site and has placed markers for two spots that have potential. follow up visit date to be confirmed. Update 6/14/17 Hodgeman is the tile contractor being used by Blattner. Investigation of possible tile strike to commence once availability dates have been verified. Following to be investigated further				
Atwater	AN051704	5/17/2017	Gravel was being spilled onto topsoil due to overfilling skidsteer buckets. Operators were requested to reduce the amount of overfill and to scrape gravel material off of topsoil where practicable.	Under review for corrections addressed / corrective measures		Shannon Kulseth	1-Jun-17	Workers were asked on May 17, 2017 to reduce amount of overfill. During this site visit previously spilled gravel was no longer present and the amount of further spillage was minimized.

Aurora Compliance Tracker - Week Ending 7/27 (eFiled on 7/27/17)

Facility	Item #	Date Obs	AIMP Issues	Contractor Resolution	Date Completed	Verified By	Date Verified	Ag Monitor Comments
Dodge Center	DC101301	10/13/2016	Vacuum trucks that were cleaning out combiner box excavations washed sediment out into an area that caused sediment to overtop and undercut the perimeter silt fence layers west of the laydown yard. There is a large area of sediment that has spread out across topsoil and through vegetation that will need to be scraped up.			Shannon Kulseth	5-Jun-17	According to Derrick Boling (Enel), a portion of the sediment was hauled offsite. Estimate of amount hauled off was unavailable. Remainder of sediment was found to have been bladed out over the topsoil. If Enel chooses to leave sediment in place the area will need to be monitored for successful vegetation establishment.
Dodge Center	DC051501	5/15/2017	Noxious Weeds: Canada thistle plants are beginning to bolt; flowering and subsequent seed set are likely within one to two weeks depending on weather. Wild parsnip plants are also plentiful on the site and along the road ditch to the east.	Update: 6/14/17 Second round of spray to occur 6/15/17 first spray done.	Sprayed 06/08 (KB)	Shannon Kulseth	15-Jun-17	Site was sprayed, plants showing signs of wilt. Various un-treated thistle and wild parsnip plants remain; site is scheduled for a second spray.
Atwater	AT041201	4/12/2017	Topsoil scraped up during snow plowing was dumped between the silt fence layers on the south end of the main wetland.	Issue to be verified by Shannon.		Shannon Kulseth	6-Jul-17	Soil sufficiently removed and spread onsite.
Dodge Center	DC052401	5/24/2017	Hydraulic fluid spill on northern laydown yard; primary accumulation of leaked fluid was observed under parked skid steer with another smaller accumulation along the central access road. Skid steer leaked fluid along several work paths along the central access roadway. Total volume of spill was unclear.	Hydraulic spill was cleaned up the same day as spill by Blattner and supervisor on site was Aaron Jantzi.	24-May-17	Shannon Kulseth	5-Jun-17	Laydown yard material has been removed and no evidence of spill or leak remained visible.
Atwater	AN051703	5/17/2017	Noxious weeds: Canada thistle plants are beginning to bolt; flowering and subsequent seed set are likely within one to two weeks depending on weather.	Update 7/11/17- Site has been sprayed twice at this point, site will be monitored during SWPPP activities and sprayed as required. Update:6/14/17 Second round of spray scheduled for 6/21/17 first spray done.	Sprayed 06/08 (KB)			
Atwater	AT111101	11/11/2016	Suspected drain tile damage in area of telecommunications installation on south side of perimeter fence just west of site entrance.	Update 6/27/17- Hodgeman has visited site and has placed markers for two spots that have potential. follow up visit date to be confirmed. Update 6/14/17 Hodgeman is the tile contractor being used by Blattner. Investigation of possible tile strike to commence once availability dates have been verified. Following to be investigated further				
Eastwood	EA050302	5/3/2016	Small amount of diesel spilled on the county highway at the site entrance.			Shannon Kulseth	8-May-17	Blattner site lead Alan Strain committed to cleaning the spill when it was first observed on 3 May 2017. No runoff was observed; spill residue remained visible on the asphalt on May 8, 2017.
Chisago	CH062901	6/29/2017	Area outside of perimeter fence has not yet been seeded.	7/11/17-MNL has been notified and will update further as things get scheduled.				
Chisago	CH062903	6/29/2017	Damage to vegetated areas due to equipment travel and material storage.	7/11/17-Due to work still ongoing, contractor have impacted the seeded areas. These areas will be monitored and repaired as needed.				
Chisago	CH062902	6/29/2017	Portions of laydown yard have no growth due to excess gravel remaining on soil surface.	7/11/17-Item has been discussed with MNL, waiting for a reponse as to what plan going forward to remediate area is. Will update further				
Chisago	CH060701	6/7/2017	Existing vegetation consisting of weedy species in some areas is becoming dense enough to interfere with establishment of native prairie.	Update 7/11/17- site is establishing native sseed, weedy vegetation will be remediated and re-seeded as necessary. Update 6/14/17 Spray scheduled no later then 6/23/17				
Dodge Center	DC070501	7/5/2017	Incompletely removed silt fencing and sediment-covered BMPs were observed periodically through the site.	Update:7/11/17- Silt fence still remains- item has been addressed several times and will continue to be until item has been remediated.				
Eastwood	EA031501	3/15/2017	Excessive amounts of sand remaining on topsoil around combiner box and trench work areas--multiple locations primarily located in the southeast quarter of the site.			Shannon Kulseth	14-Jun-17	**6/14/2017 Update: Sand was adequately removed and covered with topsoil. **5/31/17: Blattner civil crew was working to remove excess sand and cap excavations with topsoil.
Dodge Center	DC070501	7/5/2017	Untreated flowering Canada thistle plants were found in the large open area on the west side of the site.	Update 7/27/17-Site has been mowed completely mowed and will be monitored for future plants emergin. Update 7/11/17- Site has been sprayed twice at this point, areas will be monitored during SWPPP activities and sprayed as required. This site inparticular will be scheduled for another round as growth is more than patchy.				
Dodge Center	DC061501	6/15/2017	Gravel has washed off of access road onto adjacent topsoil north of the site entrance.	Update 7/27/17- Site has been completely ripped and tilled in preperation for final seed. Areas of cocern have been noted and will be monitored for future growth. Update 6/29/17- Areas of concern noted and remediation will be implemented.				
Dodge Center	DC061502	6/15/2017	Some SWPPP BMPs are nearly buried or are obscured by dense vegetation; ensure complete removal during final restoration.	Update 7/27/17- Site has been completely ripped and tilled in preperation for final seed. Silt fence and bmp's to be replaced after complete. Update 6/29/17 SWPPP is on going and item will be fixed upon next site visit.				
Hastings	HA032301	3/23/2017	Subsoils and large rock were bladed out beyond the proper footprint of the spoil storage area in the northwest corner of the site along the access road.	Under review for corrections addressed / corrective measures. Civil contractor on site, items will be addressed		Shannon Kulseth	5-Jun-17	6/15/2017 UPDATE: Area has been properly reclaimed, topsoil was spread over subsoil materials and large rock was removed from the surface of the soil. **ORIGINAL TEXT: Majority of subsoil and rock were brought back into the footprint of spoil storage area.
Dodge Center	DC060502	6/5/2017	Northern swale still has laydown yard material bladed over subsoil.	Update 7/27/17- Site has been completely ripped and tilled in preperation for final seed.Areas will be monitored for growth and remediated if required. Update 7/11/17- Material still present as time fo last inspection. Item has been added to punchlist and further works to continue until resolution. Site visit on 6/15/17, update and resolution to follow.				Laydown yard material (gravel) was still present in the swale at the time of the 6/15/2017 site visit. A significant amount of gravel also remained in a berm along the east side of the swale. The material should be removed prior to final seeding activities.

Aurora Compliance Tracker - Week Ending 7/27 (eFiled on 7/27/17)

Facility	Item #	Date Obs	AIMP Issues	Contractor Resolution	Date Completed	Verified By	Date Verified	Ag Monitor Comments
Hastings	HA051601	5/16/2017	Significant sedimentation has occurred as a result of a morning thunderstorm; topsoil is being washed off of slope and deposited onto access road.	Under review for corrections addressed / corrective measures		Shannon Kulseth	5-Jun-17	6/15/2017 UPDATE: Temporary vegetation is continuing to establish. **ORIGINAL TEXT: Temporary vegetation (oats) has emerged and is expected to facilitate site stabilization. Establishment will be monitored to ensure erosion prone areas are protected.
Hastings	HA051602	5/16/2017	Noxious Weeds: Heavy infestation of Canada thistle plants are beginning to bolt; flowering and subsequent seed set are likely within one to two weeks depending on weather.	Update 6/14/17 Second round of spray to occur on 6/20/17 Currently working with contractor to begin weed control weather permitting. Spraying occurred 5/31/17. A second round will be put on the schedule as time provides		Shannon Kulseth	5-Jun-17	Spraying resulted in a good kill of the majority of thistle onsite. A few missed plants and several newly emerging seedlings were observed. Further control efforts will likely be needed in a month to six weeks.
Dodge Center	DC060501	6/5/2017	Open area on west side of central access road has had a significant amount of soil material bladed out; the material looks to have come from the large subsoil stockpile that is located on the northern laydown area.	Update 7/27/17- Site has been completely ripped and tilled in preparation for final seed.Areas will be monitored for growth and remediated if required. Update 7/11/17- Site is scheduled for final seed in the coming week. Areas will be monitored afterward for growth and fixed as needed. Area of concern will be monitored for growth and fixed if needed.				If Enel chooses to leave the material in place the area will need to be monitored for successful vegetation establishment.
Dodge Center	DC051502	5/15/2017	6/15/2017 UPDATE: Erosion continues to persist in areas that were formerly left as grassed swales in the farm field prior to the start of construction on this site. ORIGINAL ITEM: Erosion and sedimentation; topsoil has eroded off of subsoil in multiple areas.	Update 7/27/17- Site has been completely ripped and tilled in preparation for final seed.Areas will be monitored for growth and remediated if required.Update 7/11/17- Final seed will take place in the coming week. Areas of concern to be stabilized after seeding occurs to prevent further erosion. Civil contractor works completed, item to be verified				6/15/2017: Washed sediment has been scraped from the area in the northeast corner of the arroyos and replaced back uphill. Areas of erosion remain; a plan for restoration that includes specific control measures for erosion in the formerly-grassed swales should be implemented during final restoration work on this site.
Dodge Center	DC071201	7/12/2017	Materials were staged on the lower laydown area following gravel removal; the materials are located on a slope in a manner that is causing erosion down slope.	Update 7/19/17- Staged materials for O&M. Seeding contractor on site. Reels to be cleaned up and seeded as best practices allow.				
Lake Emily	LE040501	4/5/2017	Dumped grout waste and other imported sand and gravel material is present near the SCADA building; additional clean up of this area will be needed during restoration.	Update: 6/14/17 Area cleaned, will monitor for growth and address restoration efforts as needed. Under review for corrections addressed / corrective measures		Shannon Kulseth	14-Jun-17	Imported materials appear to have been sufficiently removed from the soil surface.
Lake Emily	LE040502	4/5/2017	Large rock from access road was pushed off of entrance road onto topsoil in the adjacent field, and also on to the county highway shoulder where it poses a hazard to county mowers.	Under review for corrections addressed / corrective measures	Last week in May	Shannon Kulseth	31-May-17	Rock was confirmed to have been removed from county road ditch, as well as the large rock that was pushed into the field by snow plowing activities near site entrance.
Lake Emily	LE040501	4/5/2017	Non-certified weed free straw mulch was used onsite.			Shannon Kulseth	31-May-17	Nothing can be done about the straw application at this time; site will continue to be monitored for noxious weed presence and establishment.
Eastwood	EA061401	6/14/2017	Excessive amounts of gravel remain on topsoil on south side of entrance access road following civil restoration and removal of soil/gravel piles in this area. Amounts of gravel are very likely to interfere with vegetation establishment.	Update 6/29/17- gravel will be taken care of as best as possible. Final seed to be scheduled and area monitored afterward for growth.				
Lake Emily	LE040503	4/5/2017	Spoil piles near the POI trench did not have adequate separation of soil horizons and also lack perimeter controls.			Shannon Kulseth	31-May-17	Trenches have been backfilled with little subsoil remaining at the surface. Area will be monitored for adequate vegetation establishment.
Lake Emily	LE040504	4/5/2017	County road ditch and adjacent slope were damaged by equipment.			Shannon Kulseth	8-May-17	Road ditch damage was repaired and seeded with temporary vegetation (oats).
Eastwood	EA061402	6/14/2017	Plastic sheeting used to cover spoil piles has degraded and is being blown into the field. Sheeting should be removed and properly disposed of.	Update 7/11/17- spoil piles added to punchlist as items needing fixed. During remediation, plastic will be removed prior to earthwork. Items to be addressed with contractor. Update to follow in coming days.				6/30/2017: Majority of plastic was removed, many smaller pieces remain but will be difficult to recover due to size and weed cover.
Lake Emily	LE051801	5/18/2017	Noxious Weeds: Canada thistle plants are continuing to emerge and mature. Plants are in the early bolt stage and will likely be flowering in approximately two weeks, depending on the weather.	Update 6/14/17: Second round of spray scheduled for 6/16/17 site has been sprayed	9-Jun-17	Shannon Kulseth	14-Jun-17	Plants have been sprayed and are showing signs of a good kill.
Eastwood	EA053103	5/31/2017	A piece of broken corrugated drain tile was observed buried in the mud along a motor trench. Problems with drain tile function are presumed to be the cause of the excessive standing water on this site; see also Compliance Item EA110103.	Update 7/27/17- Tile contractor hasn't been back as of current date. Still working out time frame . Update 7/11/17- Hodgeman coming back to site in the coming days to verify/fix more tile. Further updates as work continues. Update 6/27/17- Hodgman has completed fixes on drain tile and area of concern is draining properly. Other area on site with ponding issues is in a verified wetland with drain tile with no outlet. Area to be evaluated and update to follow. Update 6/14/17 Hodgeman is the tile contractor being used by Blattner. Investigation of possible tile strike to commence once availability dates have been verified.Prior resolution: "Drain tile contractor to be onsite to investigate3rd or 4th week of November."				
Eastwood	EA053101	5/31/2017	Construction-related large rock and timber shards from broken mats were observed in the farm field immediately adjacent to the access road outside of the perimeter fence.	Update 7/27/17- Shards were not picked in time and farm field has heavy crop. As noted previously, item has been added to punch list and will be corrected when available. Update 7/11/17- This item has been added to Punchlist. MNL scheduled to work on SWPPP/Ditch area this week and hope to remediate this item as well. Update 6/14/17 Timber shards and large rock to be removed from field.				

Aurora Compliance Tracker - Week Ending 7/27 (eFiled on 7/27/17)

Facility	Item #	Date Obs	AIMP Issues	Contractor Resolution	Date Completed	Verified By	Date Verified	Ag Monitor Comments
Eastwood	EA053102	5/31/2017	Pallets, soil stockpiles, and other miscellaneous small construction materials remain in the field; materials may not all be retrievable at the moment due to standing water.	Update 7/11/17- Some items have been removed, more work is needed and is ongoing. Update: 6/14/17 all stock piles on site to be cleaned up, tracked in, and seeded.				6/30/2017: Various items are becoming recoverable due to improving site conditions.
Lake Pulaski	LP031601	3/16/2017	Trash, packaging materials, broken pallets and debris throughout the site.		Week preceeding 4/13/2017	Shannon Kulseth	13-Apr-17	Extensive cleanup efforts have occurred; some items remain but majority of previously identified waste has been controlled.
Eastwood	EA110103	11/16/2016	Potential drain tile issues resulting in chronically wet portions of the western side of the site.	Update 7/27/17- Tile contractor hasn't been back as of current date. Still working out time frame. Update 6/27/17- Hodgman has completed fixes on drain tile and area of concern is draining properly. Other area on site with ponding issues is in a verified wetland with drain tile with no outlet. Area to be evaluated and update to follow. Update 6/14/17 Hodgman is the tile contractor being used by Blattner. Investigation of possible tile strike to commence once availability dates have been verified. Prior resolution: "Drain tile contractor to be onsite to investigate 3rd or 4th week of November (2016)"				6/30/2017: Much of site is draining well after repair in one location, with just a few areas of standing water left. Additional repairs are expected to occur due to multiple locations of tile interference with piles and trenches.
Eastwood	EA111601	11/16/2016	Subsoil spoils remain on topsoil surface in several areas where trenching has been completed.	Update-7/11/17- Areas of concern have been added to punchlist. Cleaning and grading in areas is needed prior to final seed. Prior resolution: "Some material has been scraped and cleaned up, much more subsoils remain but are actively being removed."				6/30/2017: Many areas of subsoils and sand have been cleaned from topsoil surface. Remaining spoil piles are in the area that was previously flooded but will soon be accessible due to improving conditions.
Eastwood	EA110101	11/1/2016	Imported heavy rock for shoring up the access road was dumped into deep ruts.	Update:6/14/17 Temporary seeding has occurred on site. Areas affected by the sand to fill trenches or on topsoil will be monitored. Where coverage does not establish, measures will be taken in order to facilitate growth. Prior resolution: "Rock to be scraped by contractor and placed into mixed aggregate pile and ruts are to be backspread."				6/14/2017: Rock was not removed prior to temporary seeding. Current plan is to monitor establishment of temporary vegetation and take additional action only if rock interferes with temporary seed prior to final seeding. If seed establishes sufficiently, the final result will allow larger rock to remain in the field.
Eastwood	EA110102	11/1/2016	Topsoil is not being segregated from subsoil stockpile; stockpiled topsoil is being buried under subsoil and imported rocky material.	Update: 6/14/17 all stock piles on site to be cleaned up, tracked in, and seeded. Prior resolution: "To be completed by contractor by end of day 11/8/2016."				6/14/2017: Current plan is to track in and seed as noted in Contractor Resolution. Subsoil spoils are to remain on top of topsoil rather than buried as proper protocol would dictate. Reasons for the final plan include lack of workspace needed for civil work to bury the piles and high water table. Final result is due to overall poor planning by contractor performing the initial trench and construction work.
Eastwood	EA102101	10/21/2016	Large topsoil stockpile to the west of the main subsoil pile will require screening to remove large rock that was incorporated from the access road near the SCADA house.	Update 7/27/17- Stockpiles still remain on site. Some of the plastic has been removed that was covering the piles. Areas are still on punch list to be remediated, waiting on confirmation from contractor of when that will happen. Update: 6/14/17 all stock piles on site to be cleaned up, tracked in, and seeded. stockpile to be covered with topsoil and seeded				6/14/2017: Current plan is to track in and seed as noted in Contractor Resolution. Subsoil spoils are to remain on top of topsoil rather than buried as proper protocol would dictate. Reasons for the final plan include lack of workspace needed for civil work to bury the piles and high water table. Final result is due to overall poor planning by contractor performing the initial trench and construction work.
Eastwood	EA050301	5/3/2016	Water is backing up in the county road ditch at the site entrance; broken drain tile is presumed to be the cause.	Update 7/11/17- Hodgmen verified tile was in good shape, ditch line was not cleaned up from boring. Area is scheduled for work this week and should be completed by weeks end. Update 6/14/17 Hodgman is the tile contractor being used by Blattner. Investigation of possible tile strike to commence once availability dates have been verified. ditch currently dry, still need to check the drain tile				6/14/2017: Water has again backed up following rain events on 6/12 and 6/13. Hodgman was confirmed to be onsite 6/16/2017. Additional repair updates will be added to this record as they are made.
Lake Emily	LE053101	5/31/2017	A degraded tile inlet was found with inadequate sediment control and erosion away from the standpipe below the ground surface.	Update 6/14/17: New biologs installed, further maintenance to occur during rain events and as needed. SWPPP repairs scheduled for June 12th		Shannon Kulseth	30-Jun-17	New BMPs were added although installation was insufficient; proper installation was demonstrated and information was passed on to HSEQ manager while we were still onsite. 6/30/2017 UPDATE: BMPs have better placement. Reset BMPs at the end of all final seeding activities.
Eastwood	EA032901	3/29/2016	A deep rut caused by equipment traveling onto a previously trenched area exposed a significant amount of subsoil in an area that previously had ample topsoil; significant soil mixing occurred during trenching in this area.	Update:6/14/17 Temporary seeding has occurred on site. Affected areas will be monitored. Where coverage does not establish, measures will be taken in order to facilitate growth. civil contractor works completed on 06/02, areas identified to be verified again after CCTV trenches works	06/02 (KB)			6/14/2017: Subsoil has been covered with adjacent topsoil; area will be monitored through restoration to determine further measures needed (if any) for vegetation establishment.
Hastings	HA040601	4/6/2017	Drilling tailings and excess grout are present around grouted piles in the upper elevations of the site; material will likely interfere with revegetation efforts.	Update 7/11/17- as stated, tailings remian where piles were drove. Permanent fix will be addressed during site restoration as discussed with Shannon. A formal plan for activites to follow. Update 6/27/17- Item of concern has been addressed and corrected during punchlist work. Needs verification from shannon. Under review for corrections addressed / corrective measures. Civil contractor on site, items will be addressed			23-Jun-17	Tailings remain as of 7/5/2017 site visit.

Aurora Compliance Tracker - Week Ending 7/27 (eFiled on 7/27/17)

Facility	Item #	Date Obs	AIMP Issues	Contractor Resolution	Date Completed	Verified By	Date Verified	Ag Monitor Comments
Lawrence Creek	LC040601	4/6/2017	Spoil piles remain in multiple locations under arrays.	to be addressed during final seeding		Shannon Kulseth	15-Jun-17	The majority of spoil piles have been removed from the site; remaining spoils are to be removed or smoothed as appropriate during final seeding.
Lake Emily	LE063001	6/30/2017	A remaining pile of subsoil and gravel material was found under an array near the SCADA. Pile should be removed and the area seeded if necessary.	Update 7/11/17- Site has been final seeded. Growth will be monitored around areas and remediated if required.				
Lake Pulaski	LP051802	5/18/2017	Noxious weeds: Canada thistle plants are beginning to bolt near the northwest corner of the site; flowering and subsequent seed set are likely within a week to ten days depending on weather.	Update 6/14/17: Site first round of spray occurred on 6/12/14 Currently working with contractor to begin weed control weather permitting		Shannon Kulseth	20-Jun-17	Plants wilting from spray.
Lake Emily	LE063002	6/30/2017	Blooming Canada thistle plants observed along the berm on the northwestern edge of the site.	Update 7/11/17Site has been sprayed twice. Thistle emerging is in patches and will be taken care of during SWPPP/AIMP remediation visits.				
Lake Emily	LE053102	5/31/2017	Gravel for the combiner pads is already eroding onto topsoil and may interfere with vegetation establishment.	Update 7/11/17- Site has been final seeded. Growth will be monitored around areas and remediated if required.	30-May-17			
Lake Emily	LA050801	5/8/2017	A substantial amount of material from the subsoil pile that was located in the northwest corner of the site was found to have been used by the Blattner civil crew to fill ruts in topsoil.	Update 7/11/17- Site has been final seeded. Growth will be monitored around areas and remediated if required.	30-May-17			
Lake Emily	LE040502	4/5/2017	6/29/2017 UPDATE: Tile inlets need to be cleaned out down to the soil surface, disposing of accumulated sediment, straw mulch, and old BMPs. Original record: Drain tile inlets are in need of maintenance to remove debris and provide sediment control.	Update 7/11/17- Inlets need to be fully cleaned out, item was addressed with contractor. Results to follow as work proceeds. Update 6/14/17 Some tile inlets have new BMP's around them, still need to be cleaned out. Will have MNL complete this task as they progress through the sites.				New BMPs were added although installation was insufficient; proper installation was demonstrated and information was passed on to HSEQ manager while we were still onsite.
Lake Emily	LE031503	3/15/2017	6/29/2017 UPDATE: Additional metal binding straps and green plastic bands have surfaced, as well as remnant silt fencing and road fabric. Silt fencing was found to have been torn off at ground level rather than completely removed. 6/14/2017 UPDATE: Additional amounts of trash have been exposed by civil restoration work. Original record: Trash and packaging materials are present throughout the site.	Update 7/11/17- More materials becoming exposed as dirt work continues. Cleanup will be ongoing and itmes picked up and removed. site has been cleaned	9-Jun-17			UPDATE: Additional cleanup needed in some areas as more material was exposed during seeding. Silt fencing needs to be removed completely rather than torn off at ground level. Site was previously cleaned; additional amounts of trash have been exposed during civil restoration work.
Lake Emily	LE031501	3/15/2017	Recoverable amounts of sand and gravel were deposited onto topsoil during snow plowing activities; material may interfere with vegetation efforts.	topsoil not to be used, pile to be covered and seeded				Topsoil berm to be monitored until sufficiently stabilized.
Lake Emily	LE031502	3/15/2017	Subsoils are present at the surface in multiple locations in amounts that may interfere with reseeding efforts; subsoils are the result of inadequate topsoil management during 2016 construction.	temporary seeding has ocurred, results to be evaluated after grass growth				Vegetation to be monitored to ensure sufficient establishment in problem areas.
Lake Pulaski	LP041801	4/18-20/2017	Tile inlet was found with no sediment controls; discharge of sediment-laden water resulted in nuisance conditions on neighboring property. UPDATE: CONTROLS WERE INSTALLED BUT WATER WAS FLOWING UNDER THEM INTO THE INLET.	Update 7/11/17- MNL to visit site this week. Inlet drain will be addressed and fixed. Update: 6/14/17 Sediment contols will be re-established in area of concern, pictures to be shared once complete sediment control has been placed at tile inlet	30-May-17			7/13/2017 UPDATE: Sediment controls remain undercut; broken tile that was the source of the flowing water was repaired and no water is currently entering the inlet. 6/29/2017 UPDATE: Inlet found to have sediment controls installed; however water was flowing under the controls and entering the inlet with no treatment. Original record: No sediment controls had been placed around the inlet as of the inspection on 6/20/2017.
Lake Pulaski	LP062001	6/20/2017	Ensure all disturbed areas within the project ownership area are seeded with final seed mix, including those outside of the perimeter fence.	Update 6/29/17-Final seed not complete, contractor made aware of concern and will ensure final seed is planted.				
Lake Pulaski	LP060601	6/6/2017	New drain tile blowout found northwest of the open tile inlet discussed in item LP041801. Clean water was flowing at a significant rate from the blowout.	Update 7/11/17- Hodgmen has repair drain tile on site. Areas will be monitored going forward. Update 6/29/17- Hodgeman has assessed the tile and game plan for moving forward coming in the near future. Drain tile noted and will be addressed as availability of tile contractor is verified.	11-Jul-17	Shannon Kulseth	13-Jul-17	Tile repair was made, no flowing water remains in the area of the repair.
Lake Pulaski	LP062002	6/20/2017	Ensure blanketed slope near pond on northern perimeter was seeded with final seed mix; smooth slope and reblanket if necessary to stop continued erosion.	Update 6/29/17-concern noted and contractor made aware, we will ensure final seed is planted.				
Lake Pulaski	LP060102	6/1/2017	Continued erosion and sedimentation causing impacts to final seeded/restored areas.	Update 7/27/17. All tile has been repaired on site. Tile are free flowing and draining currently. Areas that were wet are starting to dry and final restoration will continue once available. Update to follow. Update 7/11/17- Drain tile has been repaired. Areas not stabilized due to water will be looked at and scheduled for final seed/stabilization. works on going to stabilize the site and prevent erosion				Large portions of site are complete, areas underwater from plugged tile inlets remain to be seeded/stabilized.
Lawrence Creek	LC051601	5/16/2017	Noxious Weeds: Canada thistle plants were observed onsite. Plants are in the rosette stage and don't appear to be widespread at this time. Plants should be monitored and controlled prior to flowering and setting seed. 6/7/2017 UPDATE: SPRAY CREW WAS ONSITE BUT SPRAYED INCORRECT SPECIES, TARGETING DOCK ( <i>Rumex sp</i> ) INSTEAD OF THISTLE.	Update 6/27/17- Site has been sprayed twice and mowed. spot checks and spray as need going forward. Update 6/14/16: Second round of spray to occur on 6/20/17 Currently working with contractor to begin weed control weather permitting. MNL spray crew on site and worked 6/5/17. Continuing work as needed	9-Jun-17	Shannon Kulseth	5-Jul-17	Sheep and spray activities are sufficiently controlling weeds onsite.
Lake Pulaski	LP060101	6/1/2017	Vegetation emergence is variable and showing signs of soil deficiencies.	results and proper remediation to be evaluated after grass growth				Monitor vegetation establishment periodically through the growing season to evaluate soil suitability and restoration success.

Aurora Compliance Tracker - Week Ending 7/27 (eFiled on 7/27/17)

Facility	Item #	Date Obs	AIMP Issues	Contractor Resolution	Date Completed	Verified By	Date Verified	Ag Monitor Comments
Waseca	WA042401	4/24/2017	Drain tile strikes have occurred with no information available on repairs, or if repairs were made prior to backfilling the trenches. Issues with site drainage are present.	Drain tile contractor onsite addressing drain tile issues	2-Jun-17	Shannon Kulseth	5-Jun-17	Site has dried out considerably. One tile blowout around a pile is still present with no immediate sign of tile repair in the vicinity. A map of tile repairs will be compared to known areas of damage once such a map is available. Site will continue to be monitored for development of further issues.
Waseca	WA051501	5/15/2017	Hydraulic fluid leak was observed on topsoil near north end of array R96. Blattner site representative Alan Strain was informed of the leak and location.	Spill was addresses	15-May-17	Shannon Kulseth	31-May-17	No evidence of leak remained visible.
Lawrence Creek	LC060701	6/7/2017	Old wetland perimeter BMPs were found pressed into the mud and under dead vegetation, in both cases nearly completely obscured; ensure these materials are removed during restoration.	BMP's will be removed prior to final restoration. Updates on progress to follow		Shannon Kulseth	5-Jul-17	7/5/2017: Discarded wetland BMPs have been removed. 6/15/2017: Some bio-logs were removed, several more remain; plans are in place to have crews remove BMPs during
Waseca	WA052401	5/24/2017	Small amount of hydraulic fluid observed in a puddle by the generators north of construction trailers.			Shannon Kulseth	31-May-17	No evidence of leak remained visible.
Waseca	WA052402	5/24/2017	Specific drain tile damage confirmed by tile blowout next to CCTV excavation just northwest of construction trailer.			Shannon Kulseth	5-Jun-17	Tile was repaired by Hodgman Drainage last week.
Waseca	WA052403	5/24/2017	Widespread use of multiple travel paths in muddy conditions is causing excessive damage to temporary vegetation. Designated travel paths are not being used to minimize impacts.			Shannon Kulseth	5-Jun-17	Cones are currently used to block off entrance to arrays in the northeast portion of the site; traffic is expected to be reduced now that the workforce on the site has been reduced.
Lake Pulaski	LP052502	5/25/2017	Crushed granite remains off road in quantities that can intervere with revegetation. Recoverable quantities of granite are present along temporary access road, in areas that have eroded, and along the primary entrance access road. Large rock that can interfere with revegetation has also been brought to the surface by seed bed preparation.	Update 7/11/17- Final seed in areas has occurred. Growth will be monitored and remeciaded as required. MNL to clean up areas prior to final seed them				Areas in question remain noted on the Barr maps; all areas have been final seeded and rock had not been removed as of the 6/6/2017 inspection.
Montrose	MO051801	5/18/2017	Significant soil washing due to sheet flow during heavy precipitation event.	Under review for corrections addressed / corrective measures		Shannon Kulseth	20-Jun-17	Erosion cleaned up, site has been smoothed.
West Faribault	WF040101	4/1/2017	Road rock is present in the farm field adjacent to the public road as well as the field on top of the hill adjacent to the project site. Rock is present in sufficient quantity to potentially interfere with farm equipment or crop growth.	Under review for corrections addressed / corrective measures. Blattern Civil Crew on work is on going. Item will be addressed with site lead	Rock picking today ES - 06/07	Shannon Kulseth	14-Jun-17	Rock was removed from the farm field adjacent to the lower parking area near farm yard. Some rock remains in fields at the top of the hill but the fields have been planted to corn and soybeans.
West Faribault	WF040102	4/1/2017	Large rock and sand from parking area and road are eroding into the landowner's yard.	Under review for corrections addressed / corrective measures. Blattern Civil Crew on work is on going. Item will be addressed with site lead Projected to be done 06/09		Shannon Kulseth	14-Jun-17	Rock was removed from an area where it had been eroding onto yard.
West Faribault	WF040103	4/1/2017	Rock checks in road ditches have failed or are overtopped with sediment and are in need of maintenance.	Under review for corrections addressed / corrective measures. Civil contractro on site, items will be addressed		Shannon Kulseth	14-Jun-17	Rock checks have been cleaned out and shored up; additional rock checks have been installed.
Lake Pulaski	LP052503	5/25/2017	Drain tile inlet was unplugged without authorization, releasing a large amount of turbid water with no adjacent slope stabilization or sediment controls around inlet.	issue addressed to the contractor, on going stabilization occuring to prevent future mishaps. No new evidences of turbid water have been identified in the lake/ponds nearby	11-Jul-17			Water entering the open inlet at the time of the 6/6/2017 inspection was clear and was found to be coming from a nearby tile blowout (See item LP060601). No sediment controls had been placed around the inlet. Site has been final seeded and mulched.
West Faribault	WF052402	5/24/2017	Drain tile perforation was evident in area where flowing water washed out the base of a pile with junction box.	Update 6/14/17: Drain tile has been repaired in two areas, no further issues exist. Blattern Civil Crew on work is on going. Item will be addressed with site lead	Complete ES - 06/07	Shannon Kulseth	14-Jun-17	Hodgman Drainage personnel were leaving site as we arrived; tile repairs were made.
Lake Pulaski	LP052501	5/25/2017	Light ripping has brought additional construction trash to the surface of worked areas.	site will be cleaned as works progress				
Lake Pulaski	LP051803	5/18/2017	Multiple repairs/enhancements to SWPPP BMPs are needed to keep available topsoil from washing away and to keep subsoil sediment from washing onto topsoil.	Update 7/27/17. All tile has been repaired on site. Tile are free flowing and draining currently. Areas that were wet are starting to dry and final restoration will continue once available. Update to follow.Update 7/11/17- Drain tile has been repaired. Areas not stabilized due to water will be looked at and scheduled for final seed/stabilization.Update:6/14/17 New BMP's have been placed around site. Hydromulched area's have stabilized the biggest areas of concern. Site will be monitored for any new erosion and handled appropriately. Ongoing work onsite to address erosion.				Large portions of site are complete, areas underwater from plugged tile inlets remain to be seeded/stabilized.
Lake Pulaski	LP051801	5/18/2017	Significant widespread erosion and sediment flows. Gravel material has eroded onto topsoil and topsoil has washed onto road in multiple areas.	Update 7/27/17. All tile has been repaired on site. Tile are free flowing and draining currently. Areas that were wet are starting to dry and final restoration will continue once available. Update to follow.Update 7/11/17- Drain tile has been repaired. Areas not stabilized due to water will be looked at and scheduled for final seed/stabilization.Ongoing work onsite to address erosion. Seeding is beginning to emerge and stabilize the site.	In Progress			Large portions of site are complete, areas underwater from plugged tile inlets remain to be seeded/stabilized.
West Waconia	WW051802	5/18/2017	Vacuumed subsoil and non-topsoil spoils were dumped across a large area onto topsoil with no perimeter controls; material washed downhill across topsoil during rain event.	Completed		Shannon Kulseth	26-May-17	Spoils were partially removed, some material was bladed out. Cleanup should be sufficient for later vegetation establishment.
Lake Pulaski	LP031602	3/16/2016	Erosion and sedimentation issues resulting from lack of stabilization across much of the site; previously applied straw mulch has been mucked into the soil and is minimally effective or not at all.	Update 7/11/17- Drain tile has been repaired. Areas not stabilized due to water will be looked at and scheduled for final seed/stabilization.Final Seeding, Hydro Mulching, and Straw mulching.	Complete SC 06/09			Large portions of site are complete, areas underwater from plugged tile inlets remain to be seeded/stabilized.

Aurora Compliance Tracker - Week Ending 7/27 (eFiled on 7/27/17)

Facility	Item #	Date Obs	AIMP Issues	Contractor Resolution	Date Completed	Verified By	Date Verified	Ag Monitor Comments
Lake Pulaski	LP071301	7/13/2017	Sediment bag remains on the east side of Eaken Ave.	Update 7/19/17- Contractor notified of bag and plans on removing when punchlist crew mobilizes.				
Lawrence Creek	LC051602	5/16/2017	Wetland perimeter BMPs have again been run over and damaged. Significant new rutting is present within the wetland perimeter.	Update 6/14/17 old logs found in area covered by weeds and grass, logs to be hauled off at earliest convenience. bmps repaired and old logs hauled off	9-Jun-17			6/15/2017: Several repairs have been made to wetland perimeter BMPs. One location of damaged BMPs still present.
Lawrence Creek	LC040602	4/6/2017	Imported rock left over from SCADA building remains along the central access road.	civil crew addressed issue, remaining to be fixed during final seeding				
Lawrence Creek	LC040603	4/6/2017	UTVs have run over multiple wetland perimeter BMPs, rendering the controls minimally effective and causing rutting within the wetland perimeter.	bmps repaired and old logs hauled off	9-Jun-17			Most wetland perimeter BMPs had been replaced prior to the 6/7/2017 inspection. One location of recently damaged BMPs remained.
Montrose	MO062003	6/20/2017	Former laydown area is lacking mulch or other stabilization. No erosion is currently occurring but this area is known to wash significantly during heavy rain events.	Update 6/28/17- Zach Erickson on site and verified MNL has hydro mulched slope for stabilization. Update 6/27/17-Issue has been addressed with contractor, erosion controls to be implemented as soon as possible. Date item fixed to follow.	11-Jul-17			
Montrose	MO062004	6/20/2017	Gravel from the inverter pad has washed onto adjacent topsoil.	Update 7/27/17- Growth in areas of concern starting to emerge. Site will be monitored further and updated with progress. Update 6/27/17- area to be visited and verified by Shannon for completion. site has been cleaned	11-Jul-17			
Montrose	MO062001	6/20/2017	Some areas remain to be seeded with the final seedmix, namely the area on the southwest corner of the project ownership area that is outside of the perimeter fence, and the sediment trap area on the south side of the site.	Update 7/27/17- Contractor has yet to re-mobilize to site. Item has been added to punch list. MNL is aware of that item needs to be corrected. Update 6/27/17-Seed contractor to remobilize to site, date will be updated when known.				
Montrose	MO062002	6/20/2017	Various trash items need to be removed, including plastic wrapping and misc. sediment control items like torn silt fencing.	Update 7/27/17- Trash remains to be picked up as they are found. Items being found as walks occur. Update 6/27/17-Items identified and areas of concern will be addressed this week, update to follow for date fixed.				
Montrose	MO052501	5/25/2017	Sediment controls around drain tile inlets are in need of maintenance prior to next rain event.	Update 6/27/17- sediment controls have been addressed 6/23/17 MNL to be scheduled for repairs	23-Jun-17			
Montrose	MO051803	5/18/2017	Imported gravel material placed for combiner pads is eroding onto surrounding topsoil.	Update 7/27/17- Growth in areas of concern starting to emerge. Site will be monitored further and updated with progress. Update 7/11/17- Areas of concern will be monitored for growth and remediated if required. Under review for corrections addressed / corrective measures				
Montrose	MO051802	5/18/2017	Likely damage to drain tile system evidenced by inlet failing to drain water from ponded area.	Update 7/11/17- Hodgeman has come out to site. Multiple areas were probed with no findings of broken tile. Area believed to be low lying and holds water. Drain tile contractor to be scheduled to resolve	11-Jul-17			
Montrose	MO040801	4/8/2017	A sinkhole was present in the central portion of the site that may be indicative of drain tile damage. 4/20/2017 UPDATE: LARGE AREAS OF STANDING WATER INDICATIVE OF TILE DAMAGE.	Update 7/11/17- Hodgeman has come out to site. Multiple areas were probed with no findings of broken tile. Area believed to be low lying and holds water. drain tile contractor to be scheduled to resolve	11-Jul-17			
Montrose	MO040701	4/7/2017	Subsoil and other imported materials are covering the topsoil in several locations.	Update 7/27/17- Growth in areas of concern starting to emerge. Site will be monitored further and updated with progress. Update 6/27/17- Final seed was accomplished on 6/22-6/24. Site will be monitored going forward for areas of concern. temporary seeding has occurred, results to be evaluated after grass growth	27-Jun-17			
Waseca	WA060517	6/5/2017	Tile blow out observed at the base of a pile in the SW portion of the site; Hodgman personnel at Pine Island on 6/7/2017 confirmed that no repairs of a tile blowout were made when the crew was at Waseca. I recommend reassessing this site for tile functionality once all construction activities are complete. If the blowout is in a portion of the line that is no longer part of the functioning system, that lateral can be capped rather than repaired so that future blowouts do not occur at this location.	Update 6/27/17- Tile was repaired by Hodgeman (6/27/17) Tile contractor will be notified of new blowout and repair details to follow when availability verified.	27-Jun-17	Shannon Kulseth	7-Jul-17	Blowout repaired, remaining additional repair work is believed to have been completed at this time.
Montrose	MO040702	4/7/2017	Trash that was previously frozen into the soil is now loose and able to be recovered/disposed of.	Update 6/27/17- More debris was found and will be taken care of, date of accomplishment to follow. civil crew works completed	1-Jun-17			
Paynesville	PA051701	5/17/2017	Noxious Weeds: Canada and plumeless thistles were observed onsite. Canada thistle is bolting and is expected to flower and set seed within a week to ten days depending on weather.	Update 7/27/17- Site has been sprayed again as of this week. multiple locations with thistle started to bloom. Will continue to monitor for emerging thistle and spray as needed. Update 7/11/17- Site is in good condition upon second spray. Wet land area needs attention and has been brought to the attention of contractor to be sprayed at earliest time. Update 6/27/17- Site has been sprayed twice. Follow up spray as needed. Update 6/14/17: Scheduled for second spray on 6/21/17 Currently working with contractor to begin weed control weather permitting. Scheduled to be sprayed 6/6/17	Sprayed DO - 06/06			6/29/2017: Thistle has been sprayed with good results across most of the site. However significant thistle patches are still present in the large wetland area on the west section of the site. Thistles are in late bloom to early seedset.
Paynesville	PA051701	5/17/2017	Significant ruts were present within the wetland boundary.	Under review for corrections addressed / corrective measures	non issue to be verified by Shannon		29-Jun-17	Once water receded the ruts were deemed shallow enough to be left as is. Additional work to back drag/smooth the ruts will cause more damage than good.
Pine Island	PI061502	6/15/2017	Topsoil is eroding from the stockpile in the southeast portion of the site; pile was never seeded or otherwise stabilized.	Update 7/11/17- Drain tile has been fixed in several locations. Water is draining off site currently. Site works will resume as conditions allow. Update 6/27/17-Site conditions not conducive for work. Drain tile repairs to take place soon and civil works can follow. Item will be taken care of and date of completion to follow.				

Aurora Compliance Tracker - Week Ending 7/27 (eFiled on 7/27/17)

Facility	Item #	Date Obs	AIMP Issues	Contractor Resolution	Date Completed	Verified By	Date Verified	Ag Monitor Comments
Pine Island	PI061501	6/15/2017	Woody vegetation, primarily boxelder saplings, are becoming established in the open area outside of the perimeter fence on the south side of the project. This is a leased site and the field must be maintained in a state that will allow for return to an agricultural capacity.	Will verify with Shannon pertaining to area in question and come up with a solution.				
Pine Island	PI051501	5/15/2017	6/15/2017 UPDATE: Significant plumeless thistle infestation developing outside of the perimeter fence on the south side of the project ownership area. Plants are continuing to emerge and are still in the rosette stage. Canada thistle plants within the perimeter fence are beginning to flower. ORIGINAL ITEM TEXT: Noxious Weeds: Canada thistle, wild parsnip and glossy buckthorn were identified onsite.	Update 7/11/17- Site has been sprayed twice to date and will continue to monitor for this site and spray as contractor is on site. Update 6/27/17-site has been sprayed once and is on the schedule for a second round this week to hit any missed or recently come up. Complete date to follow. Update 6/14/17: Spray Scheduled for 6/14/17. Currently working with contractor to begin weed control by June 16th				Plants had not yet been sprayed as of the 6/15/2017 inspection.
Waseca	WA051502	5/15/2017	Noxious weeds: Canada thistle plants are beginning to bolt; flowering and subsequent seed set are likely within one to two weeks depending on weather.	Update 7/11/17-Site has been sprayed twice and mowing is currently going on. Upon last inspection of site, this site was sparse and will be monitored going forward. Contractor to spray as required. Update 6/27/17- site has been sprayed twice as of 6/27/17. Site will be monitored going forward and sprayed as needed. Currently working with contractor to begin weed control by June 16th	27-Jun-17	Shannon Kulseth	12-Jul-17	Thistle has been sprayed, vast majority of thistle onsite has been effectively controlled. Continue to monitor and control thistle as needed, paying special attention to fall-emerging plants.
West Waconia	WW051804	5/18/2017	Turbid water has overtopped and displaced sediment control BMPs from around drain tile inlets.	Under review for corrections / corrective measures. All drain tile has since been repaired. Sediment controls in place should prevent any further turbid water from leaving site. Under final grading 6-7-17		Shannon Kulseth	6-Jul-17	Tile inlets and sediment control devices were sufficient as of the 7/6/2017 inspection.
Waseca	WA063002	6/30/2017	Silt fencing is being incompletely removed in some areas; un-staked silt fence installed by MNL in 2016 is being ripped off at ground level, leaving buried portions of the fencing in place. Other silt fencing being incompletely removed as well.	Update 7/11/17-Issue has been verified on multiple sites. Contractor made aware of issue and asked to completely remove going forward and remove what was left.				
Waseca	WA052404	5/24/2017	Extensive mixing of subsoil/topsoil horizons on the uphill portions of the central access road; excessive subsoils remaining on the surface of trenched areas in the vicinity.	Update 6/27/17-Per GIS map, areas of concern have been remediated. Verification needed by Shannon. to be corrected during civil restoration	27-Jun-17			
West Waconia	WW051807	5/18/2017	Topsoil stockpiles near northern inverter are lacking perimeter controls and have eroded significantly.	Update 6/27/17- no stockpiles remain on site. Has been graded and will be complete by 6-10-17	27-Jun-17	Shannon Kulseth	6-Jul-17	Topsoil stockpiles have been utilized.
Waseca	WA032901	3/29/2017	Equipment using multiple travel paths, causing rutting across a wide area.	Update 7/11/17- Contractor starting civil/restoration activities. Site was looking to be in good conditions as work progressed. To be addressed as part of site restoration. Travel paths have been reviewed with contractor.				7/12/2017 UPDATE: Rutted areas have largely been repaired. As of the 6/5/2017 inspection some areas have been worked with a box blade and blocked off with cones to reduce unnecessary travel.
West Waconia	WW052601	5/26/2017	Diesel spill was found in the laydown yard; fuel was leaking from a roller, presumably from fuel expansion.	Update: 6/27/17- Laydown yard has been pulled up and no remnants of spill remain behind. Fuel Spill cleaned up	27-Jun-17	Shannon Kulseth	6-Jul-17	7/6/2017 UPDATE: All laydown yard material has been removed and no evidence of spill remains. As of the 6/6/2017 inspection, this item was not completed. Spill kit contents used to stop the leak and begin soaking up spilled diesel were all still in place. Equipment had been moved but again parked alongside the spill area. Small puddles of freshly leaked diesel were present. Jeremiah Johnson (IEA) was notified.
Waseca	WA032902	3/29/2017	Inadequate or no separation of soil horizons in some trenched locations.	Under review for corrections addressed / corrective measures	27-Jun-17			Trenching has been completed on this site. Areas with excessive residual subsoil at the surface should be monitored throughout restoration to ensure adequate vegetation establishment.
Waseca	WA071201	7/12/2017	Access road gravel and inverter pad material has been eroded onto topsoil down-gradient from its source.	Update 7/27/17 Rains continued throughout the week causing more gravel and pad material to wash. Items to be addressed by contractor and update to follow. Update 7/19/17-Civil contractor on site and has been notified of concern previously and plan is for removal and replacement to appropriate areas.				
Waseca	WA071202	7/12/2017	Sheet erosion has washed topsoil downhill and also deposited eroded subsoils on top of topsoil.	Update 7/27/17 Rains continued throughout the week causing more gravel and pad material to wash. Items to be addressed by contractor and update to follow. Update 7/19/17-Civil contractor on site and has been notified of concern previously and plan is for removal and replacement to appropriate areas.				
West Faribault	WF061401	6/14/2017	Newly placed class five gravel has eroded off of access road and onto adjacent Topsoil	06/20: Blattner cleaned up roads and shoulders.	ES - 06/20			
West Faribault	WF052403	5/24/2017	Imported rock off of access road; large rock is present in significant quantities along the entire extent of the access road within the site perimeter. Residual imported material left over from gravel stockpiling is present on topsoil near SCADA.	Blattner Civil Crew on work is on going. Item will be addressed with site lead	complete ES - 06/07			7/7/2017 UPDATE: Some large rock remains along the access road and in the vicinity of PCU2. All areas have been final seeded and no plans for further rock removal are in place. 6/14/2017: A significant amount of large rock was removed with rock rake; additional raking may be needed as more rock is pulled up during ripping at time of final restoration.



Aurora Compliance Tracker - Week Ending 7/27 (eFiled on 7/27/17)

Facility	Item #	Date Obs	AIMP Issues	Contractor Resolution	Date Completed	Verified By	Date Verified	Ag Monitor Comments
West Faribault	WF052401	5/24/2017	Noxious weeds; Some Canada thistle plants around the main laydown yard are beginning to bolt. Infestation is not as severe as on other sites. Glossy buckthorn present along access road down hill. 6/5/2017 UPDATE: DENSE PATCHES OF THISTLE ARE PRESENT OUTSIDE OF FENCE ON EAST SIDE AND WITHIN THE SITE WHERE 2016 SPRAY ACTIVITIES MISSED AREAS.	Update 7/11/17- thistle in areas as stated by Shannon. Contractor has been notified of concern and will be scheduled to come spray at earliest time. Update 6/27/17- Second round of spraying has occurred. Monitor for more weeds and spray as needed. Update 6/14/17: MNL spray scheduled for 6/19/17. MNL spray will be scheduled and updated	27-Jun-17			7/7/2017 UPDATE: Newly emerged thistle plants were observed on the laydown yard following fabric removal.
Waseca	WA063001	6/30/2017	Stormwater runoff in the southwest corner of the site is causing an erosion channel in the adjacent farm field; daylight is visible under existing BMPs.			Shannon Kulseth	7-Jul-17	BMPs were maintained to provide additional protection for site corner.
West Faribault	WF032301	3/23/2017	Trash observed in various locations across the site.	Blattern Civil Crew on work is on going. Item will be addressed with site lead	Site clean up ES - 06/06			
West Waconia	WW070601	7/6/2017	A significant amount of road material eroded offroad and onto topsoil during the last significant rain. The issue was documented in the inspection report for June 13, 2017. The resulting erosion gullies were not smoothed, and erosion blankets were placed over the gullies and washed road material.	Update 7/11/17- Area is of some concern as there is substantial gravel in some areas. Item will be addressed prior to final seed to have as much cleaned up. Update to follow				
West Waconia	WW051808	5/18/2017	Imported material has been bladed onto adjacent saturated topsoil along the access road and is expected to mix with topsoil due to working conditions.	Update 7/27/17- Material bladed into soils. Site has been final seeded and site will be monitored closely for emerging native plants. Remediation of site if required. Update 6/27/17-No remaining material or stock piles on site. Material is being stock piled and hauled off site starting 6-7-17	27-Jun-17			Inaccurate response: this material was not hauled offsite. Rather, it was bladed out on top of topsoil. The result is a layer of gravel on top of topsoil that may interfere with revegetation efforts.
West Waconia	WW051803	5/18/2017	Noxious weeds: Very heavy infestation of Canada thistle across the site is approaching the flowering stage in multiple locations.	Update 7/27/17- Thistle emerging in patches. MNL made aware and they have started spraying sites again. This site is scheduled and will update further once complete. Update 7/11/17-Patches of thistle will be sprayed at earliest opportunity. Update 6/27/17- Second round of spray was conducted. On site as well of majority of parmeter was taken care of. 10 hours on site spraying (6/26/17) Site will be monitored and sprayed as needed. Currently working with contractor to begin weed control weather permitting. Spraying took place on 6/1/17. Another round will be scheduled as time provides more spraying needed	27-Jun-17			7/12/2017 UPDATE: Several plants and patches dispersing seed; many newly emerged plants becoming visible. 7/6/2017 UPDATE: Several plants missed during previous herbicide applications were found to be dispersing seed. As of the 6/6/2017 inspection, spray results were mixed; some plants were showing signs of a good kill, others were showing leaf burn but no wilt, and some patches had been missed entirely. Further control efforts needed.
West Waconia	WW051805	5/18/2017	Perimeter SWPPP BMPs have been compromised in multiple locations.	Under review for corrections / corrective measures. IEA fixed some BMP's and Silt fence. Corrective actions ongoing.	7-Jun-17			
West Waconia	WW051806	5/18/2017	Rock left over from drain tile installation/repairs remains on top of topsoil in multiple locations.	Update 7/27/17- Rock still present and on punchlist. Site has been final seeded and areas will be monitored and remediated if required. Update-7/11/17- Rock has been noted on punchlist. Final seedWill be stock piled and hauled off site 6-10-17				7/6/2017 UPDATE: As of this inspection, rock has not been removed. Much of the rock has been worked into the soil surface in some locations making recovery difficult.
West Waconia	WW051801	5/18/2017	Significant erosion of topsoil occurred; subsoil has been exposed in multiple locations.	Update 7/27/17-Site has been final seeded. Areas not stabilized have been with blankets or hydro-mulch. Erosion areas will be monitored and corrected as needed. Update-6/27/17 Site has been graded and temporary seeded. Any other works found after this point will be fixed during final seed/restoration/ Final grading on these areas starts 6-9-17	27-Jun-17			
West Waconia	WW040501	4/5/2017	Substantial amounts of soils mixed with road material was layered onto topsoil, likely resulting from snow plowing activities.	Update 7/27/17-Site has been final seeded. Areas of concern will be monitored and remediated if required. Update 6/27/17- Final restoration will take place in the near future. Areas in question will be monitored for future growth and fixed accordingly.Materials were reviewed and approved for use by barr. Graded out on site	27-Jun-17			
West Waconia	WW071301	7/13/2017	Laydown silt fence was found to have not been removed prior to final seeding in some areas.	Update 7/19/17- Concern addressed with contractor as this item is on several sites. Pushing for remdeiation will continue until item is resolved				
West Waconia	WW071302	7/13/2017	Erosion has washed away topsoil, erosion gullies remain.	Update 7/19/17- Concern noted, will have to be addressed with contractor and solution presented.				

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
Project Name	Chisago		
Date of Inspection	20170809	Start/End Time	7:10 am
Inspector's Name(s)	Shannon Kulseth		
Inspector's Title(s)	Agricultural Monitor		
Describe present phase of construction	All construction complete, site has been seeded with native prairie mix.		
Weather Information			
<b>Weather at time of this inspection?</b>			
Partly cloudy, temperature 68 degrees.			
<b>General Inspection Notes:</b>			
<p>Additional personnel accompanying me during the site visit included Frankie Lea Sr. (Enel).</p> <p>Site is in very good condition, and native prairie species are establishing well across the majority of the site. Several forb species are blooming and pollinators were observed utilizing the flowers. This site still has a high number of weedy grass and forb species that were not sprayed out prior to seeding, but native vegetation was able to be found in all areas except for a few locations around the laydown yard that have previously been noted for excessive gravel and vehicle trampling as CH062902 and CH062903, respectively.</p> <p>The area outside of the perimeter fence near the site entrance remains unseeded. This was previously logged in the compliance tracker as CH062901.</p> <p>Tyler Thornedale and John Hakenson from Minnesota Native Landscapes (MNL) arrived to spray weeds while we were onsite. I asked them about their application process. They said they were using Milestone and were applying at a rate of seven ounces per acre. This is the maximum application rate for Milestone. I then asked how they formulated their tank mix. The response was that just yesterday they had reduced the mix from 0.5 ounces per gallon to 0.3 ounces per gallon. I asked how much water they were using per acre, and they replied that the booms apply 20 gallons per acre. At the higher application rate and using the booms, they would have been exceeding the maximum application rate by nearly 50 percent.</p> <p>I asked if they were broadcast spraying with the booms or if they were hand spraying; they replied they were hand/spot spraying. I explained that when spot spraying, significantly more water is typically used than the booms. When I asked if they had calibrated the sprayer to know how much was applied by</p>			

hand spraying, neither of the applicators understood what I was talking about. Since hand spraying can result in up to 100 gallons of water per acre depending on the applicator, calibration of spraying equipment is a critical step to avoid over-application. Many areas with signs of herbicide damage have been found on multiple sites. Examples of herbicide damage include “burned out” areas with no green vegetation several weeks post-application within an area that is otherwise well-vegetated, and curled leaves on non-target vegetation such as grasses.

**Issues Noted During Inspection:**

- No new compliance items were observed on this site today.
- Concerns with MNL herbicide application process.

**Corrective Actions:**

Corrective actions discussed onsite included:

- Follow up on MNL herbicide application process.

**Photos:**



Photo 1: Blooming prairie clover.

**Photos:**



Photo 2: Bumble bee utilizing partridge pea.



Photo 3: Multiple native species present.

**Photos:**



Photo 4: Vegetation emergence in blow-sand accumulation area; establishment is a little slower but dense vegetation is present along drill marks and is expected to provide effective stabilization against further wind erosion.



Photo 5: Portions of laydown area have insufficient vegetation establishment due to excessive gravel or vehicle damage.

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
<b>Project Name</b>	Lawrence Creek		
<b>Date of Inspection</b>	20170809	<b>Start/End Time</b>	9:21 am
<b>Inspector's Name(s)</b>	Shannon Kulseth		
<b>Inspector's Title(s)</b>	Agricultural Monitor		
<b>Describe present phase of construction</b>	Final seeding complete.		
Weather Information			
<b>Weather at time of this inspection?</b>			
Partly cloudy, 69 degrees.			
<b>General Inspection Notes:</b>			
<p>Additional personnel accompanying me during the site visit included Frankie Lea Sr. (Enel).</p> <p>Site was seeded during the second week in July and cover crop has emerged. Some seedlings from the native seed mix are beginning to emerge as well. The site is primarily covered in weedy vegetation including barnyard grass, dandelion, green foxtail and reed canary grass. Sheep were used for vegetation management until final seeding.</p> <p>There are a few areas of concern across the site regarding final restoration measures. The former laydown yard still has a significant amount of gravel on the soil surface. The laydown yard and other areas of heavy use have not been ripped to relieve compaction. There are several areas across the site that appear to be suffering from herbicide burn/excessive residual; remnants of dead thistle plants are present in the center of a patch where little other vegetation remains. See the August 9<sup>th</sup>, 2017 inspection report for Chisago for a discussion of potential herbicide application concerns. These areas are not being entered into the AIMP Compliance Tracker at this time, but will continue to be monitored to ensure establishment of the final seed mix.</p> <p>A small swale on the south end of the arrays was found to be experiencing some erosion and the development of a small gully. Bio logs that were initially placed around the swale were not staked down and have been pushed by flowing water into the gully. Other Bio logs around the central wetland are beginning to disintegrate and should be removed from site and replaced with functional BMPs. These SWPPP related items are not being logged as AIMP compliance items at this time.</p>			
<b>Issues Noted During Inspection:</b>			

- Areas of concern related to final seed establishment will continue to be monitored to ensure seed establishment.

**Corrective Actions:**

Corrective actions discussed onsite included:

- Corrective actions may be identified as vegetation establishment continues to be monitored.

**Photos:**



Photo 1: Former laydown area has excessive gravel remaining on surface of topsoil.

**Photos:**



Photo 2: Area with suspected herbicide burn.



Photo 3: Disintegrating BMPs around central wetland.



# Aurora Solar

## Agricultural Inspection Report

---

General Information			
Project Name	Hastings		
Date of Inspection	20170809	Start/End Time	1:25 pm
Inspector's Name(s)	Shannon Kulseth		
Inspector's Title(s)	Agricultural Monitor		
Describe present phase of construction	Final seeding complete.		
Weather Information			
<b>Weather at time of this inspection?</b>			
Overcast, light rain, 64 degrees.			
<b>General Inspection Notes:</b>			
<p>Additional personnel accompanying me today included Frankie Lea Sr. (Enel).</p> <p>Site is in overall good condition. Cover crop and final seed mix species are emerging well and can be readily found across most of the site. Canada thistle seedlings are beginning to emerge in some areas. Given the density of the thistle stands originally observed on this site, some re-emergence is not unexpected and these plants will not likely present a control issue for at least a few weeks.</p> <p>Continued vehicle traffic down the hydro-mulched slope on the east side of the site has damaged the mulch layer and resulted in a depressed wheel track that is acting as an erosion channel. Sediment is beginning to wash down the hill and accumulate downslope. Erosion is not severe at this time but needs to be addressed to prevent further loss of topsoil.</p> <p>As previously reported, vehicle traffic has also created a two-track path along the north edge of the arrays in the area of the former laydown yard. Vegetation in this area was impacted and the wheel impressions have formed a channel that precipitation runoff has followed, creating the start of an erosion channel. No further stabilization measures were applied to the laydown area following seeding, and the vegetation is not well enough established to prevent washing of topsoil. Topsoil loss is occurring downslope along the access road. Erosion is also beginning to form a rill along the central access road. Erosion items are being added to the AIMP Compliance Tracker as HA080901.</p>			
<b>Issues Noted During Inspection:</b>			
<ul style="list-style-type: none"><li>• Vehicle traffic has damaged hydro mulch on slope, resulting in erosion on the slope. Further erosion is occurring off of the laydown area and along central access road.</li></ul>			

**Corrective Actions:**

- Stabilize erosion areas.

**Photos:**



Photo 1: Small erosion channel beginning to establish along central access road.

**Photos:**



Photo 2: Erosion occurring in wheel track on hydro-mulched slope.



Photo 3: Washed sediment accumulating over topsoil.

**Photos:**



Photo 4: Topsoil washing off of laydown yard onto access road.

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
Project Name	Pine Island		
Date of Inspection	20170809	Start/End Time	3:30 pm
Inspector's Name(s)	Shannon Kulseth		
Inspector's Title(s)	Agricultural Monitor		
Describe present phase of construction	Construction is presumably complete, awaiting restoration.		
Weather Information			
Weather at time of this inspection?			
Mostly cloudy, 68 degrees.			
<b>General Inspection Notes:</b>			
<p>Additional personnel accompanying me on the site inspection included Frankie Lea Sr. (Enel).</p> <p>Hodgman Drainage personnel resolved known tile damage issues and installed a new tile inlet. Site has drained significantly since the previous inspection.</p> <p>Canada thistle (<i>Cirsium arvense</i>) and plumeless thistle (<i>Carduus acanthoides</i>) plants were sprayed earlier in the summer. Additional plants were observed during the site inspection; plants should continue to be monitored and controlled prior to flowering and setting seed. As noted on other sites, several areas were found to be devoid of vegetation and exhibit signs of herbicide burn.</p> <p>Minor erosion that has been known to be present in the very southwestern corner of the site was found to be increasing. Narrow gullies several inches deep are eroding under the perimeter fence and resulting in sediment accumulation under the nearest array. This is being added as AIMP Compliance Tracker number PI080901.</p>			
<b>Issues Noted During Inspection:</b>			
<ul style="list-style-type: none"><li>Erosion on southwest slope adjacent to perimeter fence.</li></ul>			
<b>Corrective Actions:</b>			
<p>Corrective actions discussed onsite included:</p> <ul style="list-style-type: none"><li>Correct erosion and stabilize slope.</li></ul>			

**Photos:**



Photo 1: Areas indicative of herbicide residual presence.



Photo 2: Erosion beginning to increase on southwest corner of site.

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
Project Name	Eastwood		
Date of Inspection	20170810	Start/End Time	7:20 am
Inspector's Name(s)	Shannon Kulseth		
Inspector's Title(s)	Agricultural Monitor		
Describe present phase of construction	Site complete, awaiting final drain tile repairs, final civil work, and final seeding.		
Weather Information			
Weather at time of this inspection?			
Overcast, 61 degrees.			
General Inspection Notes:			
<p>Others accompanying me during today's site walk included Frankie Lea Sr. (Enel).</p> <p>The site is in much the same condition as the last site visit on July 26<sup>th</sup>. Minnesota Native Landscapes (MNL) was onsite beginning mowing operations last night when rain and wet site conditions forced shut down of that activity. Minor rutting was found on the east side of the site in the vicinity of a drain tile blowout that was observed during the June 30<sup>th</sup> site inspection. The pin flagging installed by Hodgman Drainage to mark the location of the blown-out tile was destroyed by mowing activities.</p> <p>No previously unreported compliance items were observed.</p>			
Issues Noted During Inspection:			
<ul style="list-style-type: none"><li>No previously unreported compliance items were observed.</li></ul>			
Corrective Actions:			
<ul style="list-style-type: none"><li>No previously unreported compliance items were observed.</li></ul>			

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
<b>Project Name</b>	Lake Emily		
<b>Date of Inspection</b>	20170810	<b>Start/End Time</b>	9:25 am
<b>Inspector's Name(s)</b>	Shannon Kulseth		
<b>Inspector's Title(s)</b>	Agricultural Monitor		
<b>Describe present phase of construction</b>	Final seed complete.		
Weather Information			
<b>Weather at time of this inspection?</b>			
Cloudy, temperature 62 degrees.			
<b>General Inspection Notes:</b>			
<p>Additional personnel accompanying me on the site inspection today included Frankie Lea Sr. (Enel).</p> <p>The site is in overall good condition. Seedlings from the final seed mix are emerging in several areas of the site. Previously reported compliance items remain outstanding.</p> <p>The site has recently been mowed, and mowed material remains in relatively thick layers in some areas. Mowed material may reduce in bulk as it dries out; this item is not being logged as a compliance item at this time. Areas of concern will be re-evaluated during the next site inspection to determine if further action is needed.</p>			
<b>Issues Noted During Inspection:</b>			
<ul style="list-style-type: none"><li>No previously unreported compliance items were observed.</li></ul>			
<b>Corrective Actions:</b>			
<ul style="list-style-type: none"><li>No previously unreported compliance items were observed.</li></ul>			



# Aurora Solar

## Agricultural Inspection Report

---

General Information			
<b>Project Name</b>	Montrose		
<b>Date of Inspection</b>	20170810	<b>Start/End Time</b>	1:30 pm
<b>Inspector's Name(s)</b>	Shannon Kulseth		
<b>Inspector's Title(s)</b>	Agricultural Monitor		
<b>Describe present phase of construction</b>	Restoration in progress, some final seeding remains outside the perimeter fence.		
Weather Information			
<b>Weather at time of this inspection?</b>			
Light rain, 65 degrees.			
<b>General Inspection Notes:</b>			
Additional personnel accompanying me on the site inspections included Frankie Lea Sr. (Enel).			
This site is in overall good condition at this time. Minor erosion is beginning to occur on the laydown area where hydro-mulch material was applied unevenly. Sheet erosion of the access road also occurred with recent rains, causing the sandy material in the gravel to flow onto adjacent topsoil. As erosion issues are not severe, these items are not being logged as compliance items at this time; areas of concern will be monitored to ensure proper vegetation establishment. If vegetation does not establish in a manner that addresses erosion issues in a suitable timeframe, it will be flagged as a compliance item at a later date.			
<b>Issues Noted During Inspection:</b>			
<ul style="list-style-type: none"><li>No new compliance items were observed.</li></ul>			
<b>Corrective Actions:</b>			
Corrective actions discussed onsite included:			
<ul style="list-style-type: none"><li>No new compliance items were observed.</li></ul>			

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
<b>Project Name</b>	Paynesville		
<b>Date of Inspection</b>	20170810	<b>Start/End Time</b>	4:00 pm
<b>Inspector's Name(s)</b>	Shannon Kulseth		
<b>Inspector's Title(s)</b>	Agricultural Monitor		
<b>Describe present phase of construction</b>	Civil restoration complete, final restoration in progress.		
Weather Information			
<b>Weather at time of this inspection?</b> Partly cloudy, temperature 75 degrees.			
<b>General Inspection Notes:</b>  Civil restoration is reportedly complete on this site. However a substantial amount of gravel remains on the surface of the laydown yard and adjacent to the central access road on the western portion of the site. De-compaction efforts on the northern end of the western portion of the site has brought numerous large rocks to the surface.  Sheep have been brought to the eastern portion of the site in lieu of mowing that area.  No compliance items are being logged at this time as restoration is still in progress.			
<b>Issues Noted During Inspection:</b> <ul style="list-style-type: none"><li>No previously unreported compliance issues were observed. Thistle remains in the wetland areas and is seeding out.</li></ul>			
<b>Corrective Actions:</b> Corrective actions discussed onsite included: <ul style="list-style-type: none"><li>No previously unreported compliance issues were observed.</li></ul>			

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
<b>Project Name</b>	West Waconia		
<b>Date of Inspection</b>	20170802	<b>Start/End Time</b>	7:15 am
<b>Inspector's Name(s)</b>	Shannon Kulseth		
<b>Inspector's Title(s)</b>	Agricultural Monitor		
<b>Describe present phase of construction</b>	Final seeding complete.		
Weather Information			
<b>Weather at time of this inspection?</b>			
Partly cloudy, 64 degrees.			
<b>General Inspection Notes:</b>			
<p>Other personnel accompanying me on the inspection included Frankie Lea and Zach Erickson (Enel), and Don Abresch (Minnesota Native Landscapes).</p> <p>Site is in essentially the same condition as was reported in the previous inspection report. MNL personnel were onsite addressing AIMP Compliance Tracker items. A significant amount of non-functioning silt fencing has been removed by MNL. Plans for removal of excess gravel, repairs to currently eroding areas and long-term erosion control strategies were discussed with Mr. Lea and Mr. Abresch.</p> <p>No previously unreported compliance items were observed.</p>			
<b>Issues Noted During Inspection:</b>			
<ul style="list-style-type: none"><li>No previously unreported compliance items were observed.</li></ul>			
<b>Corrective Actions:</b>			
<ul style="list-style-type: none"><li>No previously unreported compliance items were observed.</li></ul>			

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
<b>Project Name</b>	Lake Pulaski		
<b>Date of Inspection</b>	20170802	<b>Start/End Time</b>	10:55 pm
<b>Inspector's Name(s)</b>	Shannon Kulseth		
<b>Inspector's Title(s)</b>	Agricultural Monitor		
<b>Describe present phase of construction</b>	Construction presumably complete; restoration in progress.		
Weather Information			
<b>Weather at time of this inspection?</b>			
Sunny, temperature 74 degrees.			
<b>General Inspection Notes:</b>			
Additional personnel onsite during today's inspection included Frankie Lea (Enel).			
Site is in much the same condition as during the previous inspection. Compliance items that have been discussed in previous reports remain outstanding.			
It was noted during the site walk that no native seedlings were observed in the band of mature winter wheat on the slope above the culvert near the site entrance. Native plants were observed in the other adjacent areas with oats cover crop.			
Remaining restoration work, existing non-compliance items, and areas needing long-term erosion strategies were pointed out to and discussed with Mr. Lea.			
No new compliance items were observed.			
<b>Issues Noted During Inspection:</b>			
<ul style="list-style-type: none"><li>No new compliance items were observed.</li></ul>			
<b>Corrective Actions:</b>			
Corrective actions discussed onsite included:			
<ul style="list-style-type: none"><li>No new compliance items were observed.</li></ul>			

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
Project Name	Annandale		
Date of Inspection	20170802	Start/End Time	2:00 pm
Inspector's Name(s)	Shannon Kulseth		
Inspector's Title(s)	Agricultural Monitor		
Describe present phase of construction	Final seeding in progress.		
Weather Information			
Weather at time of this inspection?			
Partly cloudy, temperature 80 degrees.			
<b>General Inspection Notes:</b>			
<p>Other personnel onsite at the time of the site visit included Frankie Lea (Enel).</p> <p>Site is in much the same condition as the previous inspection. .</p> <p>Remaining restoration work, existing non-compliance items, and areas needing long-term erosion strategies were pointed out to and discussed with Mr. Lea.</p> <p>Canada thistle (<i>Cirsium arvense</i>) that was previously mowed on the west side of the site was found to be re-establishing and is again flowering. There is also a significant amount of thistle in the central wetland that is dispersing seed.</p>			
<b>Issues Noted During Inspection:</b>			
<ul style="list-style-type: none"><li>• Canada thistle is flowering and dispersing seed in the central wetland and on the western end of the site.</li></ul>			
<b>Corrective Actions:</b>			
<p>Corrective actions discussed onsite included:</p> <ul style="list-style-type: none"><li>• Control thistle plants with appropriate methods.</li></ul>			

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
Project Name	Waseca		
Date of Inspection	20170803	Start/End Time	6:57 am
Inspector's Name(s)	Shannon Kulseth		
Inspector's Title(s)	Agricultural Monitor		
Describe present phase of construction	Civil restoration mostly complete, awaiting final cleanup and seeding.		
Weather Information			
<b>Weather at time of this inspection?</b> Cloudy, 65 degrees with light rain and thundershowers in the area.			
<b>General Inspection Notes:</b> Additional personnel accompanying me on the site inspection today included Frankie Lea (Enel). A lightning stand down occurred shortly after arrival onsite. This site is in much the same condition as was reported during last week's inspection. No repairs to sediment/erosion control BMPs or eroded areas have been initiated. Remaining restoration work, existing non-compliance items, and areas needing long-term erosion strategies were pointed out to and discussed with Mr. Lea. Large topsoil sediment flows, chronic erosion concerns, areas of insufficient stabilization, and strategies for their correction were also discussed.			
<b>Issues Noted During Inspection:</b> <ul style="list-style-type: none"><li>Previously reported compliance items remain outstanding.</li></ul>			
<b>Corrective Actions:</b> Corrective actions discussed onsite included: <ul style="list-style-type: none"><li>See previous inspection reports for applicable corrective actions.</li></ul>			

# Aurora Solar

## Agricultural Inspection Report

---

General Information			
<b>Project Name</b>	West Faribault		
<b>Date of Inspection</b>	20170726	<b>Start/End Time</b>	9:55 am
<b>Inspector's Name(s)</b>	Shannon Kulseth		
<b>Inspector's Title(s)</b>	Agricultural Monitor		
<b>Describe present phase of construction</b>	Final seeding complete.		
Weather Information			
<b>Weather at time of this inspection?</b> Partly cloudy, temperature 63 degrees.			
<b>General Inspection Notes:</b> Additional personnel accompanying me on the site inspection today included Frankie Lea (Enel). This site is in much the same condition as was reported during the previous site inspection. Erosion concerns pertaining to the large amount of access road material becoming swept onto topsoil were discussed. Topsoil sediment flows and areas of excessive residual gravel interfering with vegetation establishment were also pointed out. No previously unreported compliance items were observed.			
<b>Issues Noted During Inspection:</b> <ul style="list-style-type: none"><li>• Previously reported erosion concerns were observed.</li></ul>			
<b>Corrective Actions:</b> Corrective actions discussed onsite included: <ul style="list-style-type: none"><li>• Clean eroded rock off of topsoil, replace washed topsoil where necessary, and stabilize eroding areas upslope from the access road.</li></ul>			

# Aurora Solar

## Agricultural Inspection Report

General Information			
<b>Project Name</b>	Dodge Center		
<b>Date of Inspection</b>	20170803	<b>Start/End Time</b>	12:19 pm
<b>Inspector's Name(s)</b>	Shannon Kulseth		
<b>Inspector's Title(s)</b>	Agricultural Monitor		
<b>Describe present phase of construction</b>	Final seeding in progress.		
Weather Information			
<b>Weather at time of this inspection?</b>			
Overcast, 63 degrees.			
<b>General Inspection Notes:</b>			
<p>As reported in the July 27<sup>th</sup>, 2017 inspection report, nearly the entire site, including areas that were not previously impacted by construction activities, has been tilled up to the perimeter fence, and nearly all perimeter SWPPP BMPs have been removed. No other stabilization or sediment control measures have been implemented at this time.</p> <p>The previously reported erosion issues on the northern end of the site have been smoothed but not yet stabilized. Gravel/rock within the northern swale was not scraped out of the swale. Sediment control BMPs have been replaced across the swale. Other previously reported compliance items remain outstanding.</p>			
<b>Issues Noted During Inspection:</b>			
<ul style="list-style-type: none"> <li>Compliance items related to erosion, washed gravel, and BMP removal remain outstanding.</li> </ul>			
<b>Corrective Actions:</b>			
<p>Corrective actions include:</p> <ul style="list-style-type: none"> <li>Stabilize site.</li> <li>Ensure complete removal of non-functioning SWPPP BMP material.</li> </ul>			



# CORINNA TOWNSHIP

County of Wright  
9801 Ireland Avenue NW  
Annandale, MN 55302  
(320) 274-8049 – Town Hall

AUGUST 11, 2017

Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101



RE: Aurora Distributed Solar, LLC- Docket GS-14-515

Corinna Township submits this letter in response to the Notice of Comment Period issued on July 13, 2017 regarding the Site Permit issued to Aurora Distributed Solar, LLC. This is specifically in regard to the Annandale site located in Corinna Township.

Photographs of the site are included. They show the run-down condition of the property. Corinna Township was assured that the property would be kept in immaculate condition. Corinna Township prides itself on the upkeep of the properties within the Township. This site is an eyesore, with dead trees, tall, possibly noxious weeds, a crumpled up stop sign, and loose wires.

If there are any questions regarding these concerns I can be reached at 320-274-8049.

Sincerely,

For the Town Board,

A handwritten signature in cursive script that reads "Mary B. Brown".

Mary Barkley Brown  
Clerk









