

Memorandum

To: Commissioners Julie Fedorchak, Randy Christmann, and Brian Kroshus
From: Adam Renfandt
Date: May 5, 2021
Subject: Aurora Wind Project, LLC - Tree and Shrub Mitigation Plans (Case Nos. PU-18-351 and PU-18-352)

On April 12, 2021, Aurora Wind Project, LLC (AWP) filed two Tree and Shrub Mitigation Plans (Plans) pursuant to Provision No. 10 of the Tree and Shrub Mitigation Specifications (Specifications), attached to and incorporated within the Commission's May 7, 2019 Findings of Fact, Conclusions of Law and Order in Case No. PU-18-152 and within the Commission's May 29, 2019 Findings of Fact, Conclusions of Law and Order in Case No. PU-18-151.

In July and August of 2019 and prior to construction, AWP retained a consultant to conduct an inventory of trees and shrubs, which identified 8,141 plants within the project area of the wind farm and transmission line. The post-construction inventory determined that 183 trees and shrubs were removed during construction of the wind farm, and 299 trees and shrubs were removed during construction of the associated transmission line. Landowners who had plants removed from their properties were given options on whether and where to locate the plantings on their property or waive those options in writing. Although all planting locations have yet to be finalized, AWP intends to replace trees and shrubs in a 2:1 replacement ratio, representing the replanting of 964 individuals across both Plans. Shrubs outside the permanent right-of-way which were either cut flush to the ground or removed in areas where the native topsoil was preserved will be allowed to regenerate.

If approved by the Commission, the plantings will be completed in early May 2021, permitting weather and appropriate soil conditions. Upon completion of the plantings, baseline reports documenting a replacement count by species by location will be submitted to the Commission. Beginning one full year after planting, the replacements will be inspected each year in September for three years, and reports will be submitted to the Commission by October 1 of each year. If the survival rate of the replacements exceeds 75% following final inspection, the Plans will have assumed to have fulfilled the Specifications.

Staff has reviewed the Plans and believes they achieve the objectives set forth in the Specifications.