### EXHIBIT A

# BURNS MEDONNELL

June 26, 2018

Mr. Matt Marsh Environmental Manager Western Area Power Administration – Upper Great Plains Region 2900 4th Avenue North Billings, MT 59101-1266

Re: Willow Creek EA – Layout Update

Dear Mr. Marsh:

On January 4, 2014, Wind Quarry, LLC ("Wind Quarry") submitted an interconnection request to the Western Area Power Administration ("WAPA") to connect its proposed Willow Creek Wind Energy Facility (the "Project"), a 103.5-megawatt ("MW") nameplate capacity wind energy facility in Butte County, South Dakota, to WAPA's Maurine to Rapid City 115-kilovolt ("kV") transmission line. Interconnection would be at a new switchyard to be constructed by WAPA and located within the Project Area.

In accordance with the National Environmental Policy Act ("NEPA") and other applicable environmental regulations, WAPA prepared an Environmental Assessment ("EA") entitled *Willow Creek Wind Energy Facility Draft Environmental Assessment* ("DOE/EA-2016") to consider the interconnection request and analyze the potential environmental impacts of Wind Quarry's proposed Project. The EA identified no significant impacts to environmental resources resulting from either WAPA's Federal action or Wind Quarry's proposed Project. On November 10, 2016, WAPA issued a Finding of No Significant Impact ("FONSI") and approved the Final EA.

In May 2017, Pattern Renewables 2 LP ("**Pattern**") acquired the Project from Wind Quarry. Since the acquisition, Pattern has continued development activities on the Project, including refinement of the Project layout. Pattern is proposing changes to the Project layout from what was analyzed in the EA, approved in November 2016. Proposed changes include fewer, larger turbines; a revised electrical collection system layout; a new operations and maintenance building location; and a revised access road layout. For clarity, Pattern is not proposing to change the turbine locations from the originally approved 45 turbine locations. The purpose of this letter is to provide WAPA with information to evaluate the proposed layout changes and review the layout for compliance with the requirements of the EA.

The following sections describe the proposed changes to the Project layout and summarize the changes that would occur to each environmental resource evaluated in the original EA.

#### **PROJECT LAYOUT CHANGES**

In the EA, Wind Quarry proposed to install approximately 45 Siemens 2.3-108 turbines. The EA indicated in Section 2.1.1.1 that:



Alternate wind turbine models may be considered for the Project. As turbine technology advances, manufacturers discontinue turbine models and release new ones. Other factors, such as cost and availability at the time of ordering, may dictate final selection of a turbine manufacturer and model. It is anticipated that the specifications for alternate models would be similar to the proposed turbine model and that the turbine layout would not be significantly affected should an alternate model be selected.

Currently, Pattern is evaluating four different turbine types for the Project and is proposing to install one of the following three turbine combination scenarios:

- 1. 44 Turbine Layout: 31 GE 2.3-116 turbines and 13 GE 2.5-127 turbines
- 2. 42 Turbine Layout: 7 GE 2.3-116 turbines and 35 GE 2.5-127 turbines
- 3. 38 Turbine Layout: 7 Siemens 2.415-108 turbines and 31 Siemens 2.75-129 turbines

In 2016, Pattern purchased a certain amount of wind turbines from several different manufacturers in order to potentially qualify a variety of wind projects, with commercial operations dates of 2020 or before, for 100 percent of the Federal Production Tax Credit ("**PTC**"). These PTC turbines may represent anywhere from 5 to 70 percent of the overall nameplate capacity of the Project, with the remaining balance of the Project rated capacity to utilize larger turbines of a different model from the same manufacturer.

Pattern is in the process of making decisions on the most appropriate allocation of these turbines and the combinations of turbine models that prove to be the best decision for the overall success of the Project, including environmental impact and local siting considerations. Because of advancements in turbine technology and cost, using larger turbines allows Pattern to reduce the number of turbines needed to achieve the same overall Project rated capacity.

Specifications for the four proposed turbine models, as compared to the Siemens 2.3-108 turbine model presented in the EA, are provided for reference in Table 1.

As mentioned, under any of the three proposed turbine combination scenarios, turbines would be located at the same locations as presented in the EA. However, because of the larger rated capacity of the individual turbines, fewer turbine locations would be utilized (38, 42, or 44 turbine locations depending on the scenario) to achieve approximately the same overall Project rated capacity. The figures in Appendix A show the Project layout under each of the three scenarios, as compared to the original 45-turbine layout.



|  | Siemens              |                 |               |                                   |                  |
|--|----------------------|-----------------|---------------|-----------------------------------|------------------|
|  | 2.3-108              |                 |               |                                   |                  |
|  | (presented<br>in EA) | GE<br>2.3-116   | GE<br>2.5-127 | Siemens<br>2.415-108 <sup>a</sup> | Siemens 2.75-129 |
| Rated output (megawatts)   | 2.3                  | 2.3             | 2.52          | 2.415                             | 2.75             |
| Hub height (feet)  | 262                  | 262             | 291           | 262                               | 285              |
| Rotor diameter (feet)  | 354                  | 381             | 417           | 354                               | 426              |
| Total height (feet)  | 440                  | 453             | 499           | 440                               | 498              |
| Cut-in wind speed (miles per hour) <sup>b</sup>                      | 7 to 9               | 7 to 8          | 6 to 7        | 7 to 9                            | 7                |
| Rated capacity wind speed (miles per hour) <sup>c</sup>              | 25 to 27             | 23 to 25        | 25 to 26      | 25 to 27                          | 25 to 27         |
| Cut-out wind speed (miles per hour) <sup>d</sup>                     | 56                   | 72 <sup>e</sup> | 67            | 56                                | 51               |
| Maximum 3-second gust<br>wind speed (miles per<br>hour) <sup>f</sup> | 133                  | 112             | 112           | 133                               | 133              |
| Rotor speed (revolutions<br>per minute)                              | 6 to 16              | 8 to 15.7       | 8 to 15.7     | 6 to 16                           | 5.5 to 12.5      |

| Table 1: | Wind | Turbine | Characteristics |
|----------|------|---------|-----------------|
|----------|------|---------|-----------------|

(a) Siemens 2.415-108 is the Siemens 2.3-108 turbine with the ability to boost production at certain wind speeds from 2.3 MW to 2.415 MW

(b) Cut-in wind speed = wind speed at which turbine begins operation

(c) Rated capacity wind speed = wind speed at which turbine reaches its rated capacity

(d) Cut-out wind speed (600 second average) = wind speed above which turbine shuts down operation

(e) Turbine de-rates to 1.2 MW above 49 mph and then cuts out above 72 mph

(f) Maximum 3-second gust wind speed - wind speed up to which turbine is designed to withstand

In addition to the proposed changes in turbine type, Pattern is proposing a revised electrical collection line and access road layout. The collection and road layouts differ slightly under each scenario, as shown on the figures in Appendix A. Two figures are included for each scenario – one showing access roads and one showing the collection lines. A breakdown of temporary and permanent disturbance under each of the three proposed scenarios, as compared to the original 45-turbine layout, is included in Appendix B.



Finally, Pattern is proposing to move the operations and maintenance building location from the north end of the Project to the south end to be closer to Highway 212 and provide simpler access to the employees of the wind farm.

### **COMPARISON OF ENVIRONMENTAL IMPACTS**

Potential impacts of the three Project layout scenarios have been identified for each environmental resource evaluated in the original EA. The potential impacts of each scenario, as compared to the impacts for the layout presented in the EA, are summarized in Table 2.

Pattern conducted the following studies to evaluate the impacts of each proposed scenario:

- Stream and wetland delineations for the revised access road and collection system layouts were conducted in January and April 2018 by FMG Engineering, Inc., the same consultant that conducted surveys for the original layout. All delineated streams and wetlands are avoided by Project infrastructure and will be avoided during construction and operation of the Project under all three proposed scenarios.
- Predicted sound levels from wind turbine operation were modeled for the three proposed scenarios in April 2018 by Burns & McDonnell, the same consultant that conducted noise modeling for the original turbine layout. Only two residences are expected to have sound impacts. Predicted sound levels at the nearest residence, a participating landowner, would be within the range of typical sound levels for rural areas (33 to 47 dBA) under all scenarios. Predicted sound levels at the other residence would not exceed 29.7 dBA under any of the proposed scenarios.
- Cultural resources surveys for the revised access road and collection system layouts were conducted in December 2017 and April 2018 by Quality Services, Inc., the same consultant that conducted surveys for the original layout (see Appendix C). An historic period cultural resource, site 39BU0554, was discovered during pedestrian survey of the proposed collector line reroutes. The site is recommended not eligible for the National Register of Historic Places (NRHP), and Quality Services, Inc. recommends a finding of no historic properties affected for the collector line reroutes. No cultural resource sites were discovered during the pedestrian survey of the proposed access road reroutes.
- In order to compare potential impacts to avian and bat species from the different turbine scenarios, Burns & McDonnell conducted a desktop analysis to compare the total rotor swept areas for each scenario. Based on the rotor diameters presented in Table 1, the original 45-turbine layout would result in 411,471 square meters of rotor swept areas for the Project as a whole. By comparison, the total rotor swept areas would be 493,289 square meters for the 44-turbine layout, 518,221 square meters for the 42-turbine layout, and 474,495 square meters for the 38-turbine layout. If it is assumed that the risk of avian and bat mortality increases as the total rotor swept area increases, then the risk of avian and bat



mortality could increase under the 44-turbine, 42-turbine, and 38-turbine scenarios, as compared to the original 45-turbine layout. However, there is not a direct one-to-one correlation between the increase in rotor swept area and the increase in avian and bat mortality. Other site conditions impact avian and bat mortality rates as well.

Rotor speeds may also affect avian and bat mortality risk, with faster moving blades potentially posing a greater risk. Based on the rotor speeds presented in Table 1, the 44turbine and 42-turbine scenarios would have similar rotor speeds as the original 45-turbine layout, and therefore would have a similar risk of impacts to avian and bat species related to rotor speeds. The 38-turbine layout would have lower rotor speeds compared to the 45turbine layout, and therefore would have a lower risk of avian and bat mortality related to rotor speeds. The rotor swept areas would also increase in elevation slightly under the 44, 42 and 38 turbine scenarios, as shown in Table 1. This may alter the risk to avian species, dependent upon their flight characteristics, with a potential slight reduction in impacts to low-flying, ground nesting birds and a potential slight increase in impacts to higher flying species.

Finally, since bats are more active in low wind conditions, lower cut-in speeds have the potential to result in greater bat mortality risk. Based on the cut-in speeds presented in Table 1, the three proposed scenarios would all have similar cut-in speeds as the original 45-turbine layout, and, therefore, risk to bat species related to cut-in speeds would be similar for all scenarios. Also, Willow Creek Wind commits to feathering blades below cut-in-speed for any turbine model selected, which has shown to significantly reduce bat mortalities.



| Resources                                 | <b>45-Turbine Layout</b><br>(presented in EA)  | 44-Turbine Layout   | 42-Turbine Layout   | 38-Turbine Layout  |
|---|--|---|---|--|
| Land Cover and<br>Land Use                | Approximately 331<br>acres of temporary loss<br>and 109 acres of long-<br>term loss of agricultural<br>land. Of the 45<br>proposed wind turbines,<br>29 would be constructed<br>in rangeland, 3 in<br>cropland/hayland, and<br>13 in CRP lands.  | Approximately 368<br>acres of temporary loss<br>and 109 acres of long-<br>term loss of agricultural<br>land. Of the 44<br>proposed wind turbines,<br>28 would be constructed<br>in rangeland, 3 in<br>cropland/hayland, and<br>13 in CRP lands. | Approximately 361<br>acres of temporary loss<br>and 107 acres of long-<br>term loss of agricultural<br>land. Of the 42<br>proposed wind turbines,<br>27 would be constructed<br>in rangeland, 3 in<br>cropland/hayland, and<br>12 in CRP lands. | Approximately 332<br>acres of temporary loss<br>and 98 acres of long-<br>term loss of agricultural<br>land. Of the 38<br>proposed wind turbines,<br>24 would be constructed<br>in rangeland, 3 in<br>cropland/hayland, and<br>11 in CRP lands. |
| Geologic Setting<br>and Soil<br>Resources | Approximately 331<br>acres of temporary soil<br>disturbance and 109<br>acres of soil surface<br>permanently removed.Approximately 368<br>acres of temporary soil<br>disturbance and 109<br>acres of soil surface<br>permanently removed.Turbine locations and<br>access roads avoid areasTurbine locations and<br>access roads avoid areas |   | Approximately 361<br>acres of temporary soil<br>disturbance and 107<br>acres of soil surface<br>permanently removed.<br>Turbine locations and<br>access roads avoid areas   | Approximately 332<br>acres of temporary soil<br>disturbance and 98 acres<br>of soil surface<br>permanently removed.<br>Turbine locations and<br>access roads avoid areas   |
|   | with slopes exceeding 15 percent.  | with slopes exceeding 15 percent.   | with slopes exceeding<br>15 percent.  | with slopes exceeding 15 percent.  |
| Water Resources                           | Turbines, access roads, and collector system   | Streams and wetlands were delineated for the  | Streams and wetlands were field delineated for  | Streams and wetlands were field delineated for   |

 Table 2: Comparison of Project Layout Impacts



| Resources                  | <b>45-Turbine Layout</b><br>(presented in EA)   | 44-Turbine Layout  | 42-Turbine Layout  | 38-Turbine Layout  |
|----------------------------|---|--|--|--|
| а<br>Ю                     | avoid streams and<br>wetlands.<br>Approximately 331<br>acres of temporary soil<br>disturbance; BMPs<br>would be implemented<br>to control erosion and<br>sedimentation. | revised layout in<br>January and April 2018.<br>Revised road layout<br>avoids streams and<br>wetlands. Revised<br>collection layout will<br>bore underneath streams<br>and wetlands with no<br>impact. | the revised layout in<br>April 2018. Revised<br>road layout avoids<br>streams and wetlands.<br>Revised collection<br>layout will bore<br>underneath streams and<br>wetlands with no<br>impact. | the revised layout in<br>April 2018. Revised<br>road layout avoids<br>streams and wetlands.<br>Revised collection<br>layout will bore<br>underneath streams and<br>wetlands with no<br>impact. |
|                            |   | Approximately 368<br>acres of temporary soil<br>disturbance; BMPs<br>would be implemented<br>to control erosion and<br>sedimentation.  | Approximately 361<br>acres of temporary soil<br>disturbance; BMPs<br>would be implemented<br>to control erosion and<br>sedimentation.  | Approximately 332<br>acres of temporary soil<br>disturbance; BMPs<br>would be implemented<br>to control erosion and<br>sedimentation.  |
| Air Quality and<br>Climate | Short-term air emissions from construction activities.  | Short-term air emissions from construction activities.   | Short-term air emissions from construction activities.   | Short-term air emissions from construction activities.   |
|                            | Project could avoid 4 to<br>24 percent of air<br>emissions from   | Project could avoid 4 to<br>24 percent of air<br>emissions from  | Project could avoid 4 to<br>24 percent of air<br>emissions from  | Project could avoid 4 to<br>24 percent of air<br>emissions from  |



| Resources     | 45-Turbine Layout<br>(presented in EA)  | 44-Turbine Layout  | 42-Turbine Layout  | 38-Turbine Layout  |
|---------------|---|--|--|--|
|               | displaced fossil-fueled power generation.   | displaced fossil-fueled power generation.  | displaced fossil-fueled power generation.  | displaced fossil-fueled power generation.  |
| Noise Impacts | Predicted sound level at<br>nearest residence to a<br>turbine is 43.3 dBA,<br>within the range of<br>typical sound levels for<br>rural areas (33 to 47<br>dBA). | Predicted sound levels<br>from operation of the<br>GE 2.3-116 and GE 2.5-<br>127 turbines were<br>modeled in April 2018.<br>Only two residences<br>expected to have sound<br>impacts. Predicted<br>sound level at nearest<br>residence (a<br>participating landowner)<br>is 46.9 dBA, within the<br>range of typical sound<br>levels for rural areas.<br>Predicted sound level at<br>the other residence is<br>27.9 dBA. | Predicted sound levels<br>from operation of the<br>GE 2.3-116 and GE 2.5-<br>127 turbines were<br>modeled in April 2018.<br>Only two residences<br>expected to have sound<br>impacts. Predicted<br>sound level at nearest<br>residence (a<br>participating landowner)<br>is 46.9 dBA, within the<br>range of typical sound<br>levels for rural areas.<br>Predicted sound level at<br>the other residence is<br>29.7 dBA. | Predicted sound levels<br>from operation of the<br>Siemens 2.415-108 and<br>Siemens 2.75-129<br>turbines were modeled<br>in April 2018. Only two<br>residences expected to<br>have sound impacts.<br>Predicted sound level at<br>nearest residence (a<br>participating landowner)<br>is 44.2 dBA, within the<br>range of typical sound<br>levels for rural areas.<br>Predicted sound level at<br>the other residence is<br>26.5 dBA. |
| Ecological    | Approximately 331   | Approximately 368  | Approximately 361  | Approximately 332  |
| Resources     | acres of temporary  | acres of temporary   | acres of temporary   | acres of temporary   |
|               | disturbance and 109   | disturbance and 109  | disturbance and 107  | disturbance and 98 acres   |
|               | acres of permanent  | acres of permanent   | acres of permanent   | of permanent   |



| Resources           | 45-Turbine Layout<br>(presented in EA)  | 44-Turbine Layout   | 42-Turbine Layout   | 38-Turbine Layout   |
|---------------------|---|---|---|---|
|                     | disturbance to vegetation.  | disturbance to vegetation.  | disturbance to vegetation.  | disturbance to vegetation.  |
|                     | BBCS would be<br>implemented to reduce<br>risk of impacts to birds<br>and bats.   | BBCS would be<br>implemented to reduce<br>risk of impacts to birds<br>and bats.   | BBCS would be<br>implemented to reduce<br>risk of impacts to birds<br>and bats.   | BBCS would be<br>implemented to reduce<br>risk of impacts to birds<br>and bats.   |
|                     | Project may affect, but<br>is not likely to<br>adversely effect, the<br>whooping crane and<br>northern long-eared bat.<br>Conservation measures<br>in the Programmatic BA<br>and NLB PBO would be<br>implemented. | Project may affect, but<br>is not likely to<br>adversely effect, the<br>whooping crane and<br>northern long-eared bat.<br>Conservation measures<br>in the Programmatic BA<br>and NLB PBO would be<br>implemented. | Project may affect, but<br>is not likely to<br>adversely effect, the<br>whooping crane and<br>northern long-eared bat.<br>Conservation measures<br>in the Programmatic BA<br>and NLB PBO would be<br>implemented. | Project may affect, but<br>is not likely to<br>adversely effect, the<br>whooping crane and<br>northern long-eared bat.<br>Conservation measures<br>in the Programmatic BA<br>and NLB PBO would be<br>implemented. |
| Visual<br>Resources | Introduction of vertical<br>lines of 45 wind<br>turbines into the<br>generally horizontal<br>landscape.   | Introduction of vertical<br>lines of 44 wind<br>turbines into the<br>generally horizontal<br>landscape.   | Introduction of vertical<br>lines of 42 wind<br>turbines into the<br>generally horizontal<br>landscape.   | Introduction of vertical<br>lines of 38 wind<br>turbines into the<br>generally horizontal<br>landscape.   |
|                     | Visual impacts to scenic resources not  |



| Resources                    | <b>45-Turbine Layout</b><br>(presented in EA)  | 44-Turbine Layout   | 42-Turbine Layout   | 38-Turbine Layout   |
|------------------------------|--|---|---|---|
|                              | anticipated. Nearest<br>proposed turbine to<br>Belle Fourche NWR is<br>20 miles, and nearest<br>proposed turbine to<br>Bear Butte is 26 miles.   | anticipated. Nearest<br>proposed turbine to<br>Belle Fourche NWR is<br>20 miles, and nearest<br>proposed turbine to<br>Bear Butte is 26 miles.  | anticipated. Nearest<br>proposed turbine to<br>Belle Fourche NWR is<br>20 miles, and nearest<br>proposed turbine to<br>Bear Butte is 26 miles.  | anticipated. Nearest<br>proposed turbine to<br>Belle Fourche NWR is<br>20 miles, and nearest<br>proposed turbine to<br>Bear Butte is 26 miles.  |
| Paleontological<br>Resources | BMPs and conservation<br>measures would be<br>implemented to<br>minimize potential<br>paleontological<br>resources impacts.  | BMPs and conservation<br>measures would be<br>implemented to<br>minimize potential<br>paleontological<br>resources impacts.   | BMPs and conservation<br>measures would be<br>implemented to<br>minimize potential<br>paleontological<br>resources impacts.   | BMPs and conservation<br>measures would be<br>implemented to<br>minimize potential<br>paleontological<br>resources impacts.   |
| Cultural<br>Resources        | Project avoids NRHP-<br>eligible and unevaluated<br>properties.<br>Notification and<br>protection protocols<br>would be followed if<br>unanticipated cultural<br>resources are found<br>during construction. | Cultural resources<br>surveys were conducted<br>for the revised layout in<br>December 2017 and<br>April 2018. An historic<br>period cultural resource,<br>site 39BU0554, was<br>discovered during<br>pedestrian survey of the<br>proposed collector line<br>reroutes. The site is | Cultural resources<br>surveys were conducted<br>for the revised layout in<br>December 2017 and<br>April 2018. An historic<br>period cultural resource,<br>site 39BU0554, was<br>discovered during<br>pedestrian survey of the<br>proposed collector line<br>reroutes. The site is | Cultural resources<br>surveys were conducted<br>for the revised layout in<br>December 2017 and<br>April 2018. An historic<br>period cultural resource,<br>site 39BU0554, was<br>discovered during<br>pedestrian survey of the<br>proposed collector line<br>reroutes. It is |



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| Resources      | <b>45-Turbine Layout</b><br>(presented in EA)  | 44-Turbine Layout  | 42-Turbine Layout  | 38-Turbine Layout  |
|----------------|--|--|--|--|
|                | Project would have <b>no</b><br><b>adverse effect</b> on<br>historic resources.                                    | recommended not<br>eligible for the NRHP,<br>and Quality Services,<br>Inc. recommends a<br>finding of no historic<br>properties affected for<br>the collector line<br>reroutes. No cultural<br>sites were discovered<br>during the pedestrian<br>survey of the proposed<br>access road reroutes. | recommended not<br>eligible for the NRHP,<br>and Quality Services,<br>Inc. recommends a<br>finding of no historic<br>properties affected for<br>the collector line<br>reroutes. No cultural<br>sites were discovered<br>during the pedestrian<br>survey of the proposed<br>access road reroutes. | recommended not<br>eligible for the NRHP,<br>and Quality Services,<br>Inc. recommends a<br>finding of no historic<br>properties affected for<br>the collector line<br>reroutes. No cultural<br>sites were discovered<br>during the pedestrian<br>survey of the proposed<br>access road reroutes. |
|                |  | Notification and<br>protection protocols<br>would be followed if<br>unanticipated cultural<br>resources are found<br>during construction.  | Notification and<br>protection protocols<br>would be followed if<br>unanticipated cultural<br>resources are found<br>during construction.  | Notification and<br>protection protocols<br>would be followed if<br>unanticipated cultural<br>resources are found<br>during construction.  |
| Socioeconomics | Project would result in<br>short-term and long-<br>term positive economic<br>impacts from job<br>creation, project | Project would result in<br>short-term and long-<br>term positive economic<br>impacts from job<br>creation, project   | Project would result in<br>short-term and long-<br>term positive economic<br>impacts from job<br>creation, project   | Project would result in<br>short-term and long-<br>term positive economic<br>impacts from job<br>creation, project   |



| Resources                | 45-Turbine Layout<br>(presented in EA)  | 44-Turbine Layout   | 42-Turbine Layout   | 38-Turbine Layout   |
|--------------------------|---|---|---|---|
|                          | expenditures, lease<br>payments, and tax<br>revenue.  |
| Environmental<br>Justice | No disproportionately<br>high and adverse human<br>health or environmental<br>effects are expected. | No disproportionately<br>high and adverse human<br>health or environmental<br>effects are expected. | No disproportionately<br>high and adverse human<br>health or environmental<br>effects are expected. | No disproportionately<br>high and adverse human<br>health or environmental<br>effects are expected. |



#### CONCLUSION

As shown in the disturbance estimate tables in Appendix B, the permanent disturbance acreages for all three proposed scenarios are equal to or less than the disturbance acreage for the previously permitted 45-turbine scenario. Due to the re-designed electrical collection system creating new instances where the collection system does not overlap with the access roads, the total temporary disturbance acreage is moderately increased in the three proposed scenarios. As shown in Table 2, the environmental effects from construction and operation of the Project under any of the three proposed scenarios would be consistent with the those analyzed in the EA. Pattern would implement the BMPs and conservation measures in the EA to avoid and minimize impacts to environmental resources.

Pattern anticipates making a final decision on the Project design in 2018 but desires to submit this memo to WAPA now in order to have confidence in the ability to proceed with the proposed layout changes under any of the three scenarios. Please contact me at (303) 474-2229 or James Madson at (415) 670-5110 if you have any questions or need further information to conduct your evaluation.

Sincerely,

Jennifer Bell Senior Environmental Scientist Burns & McDonnell

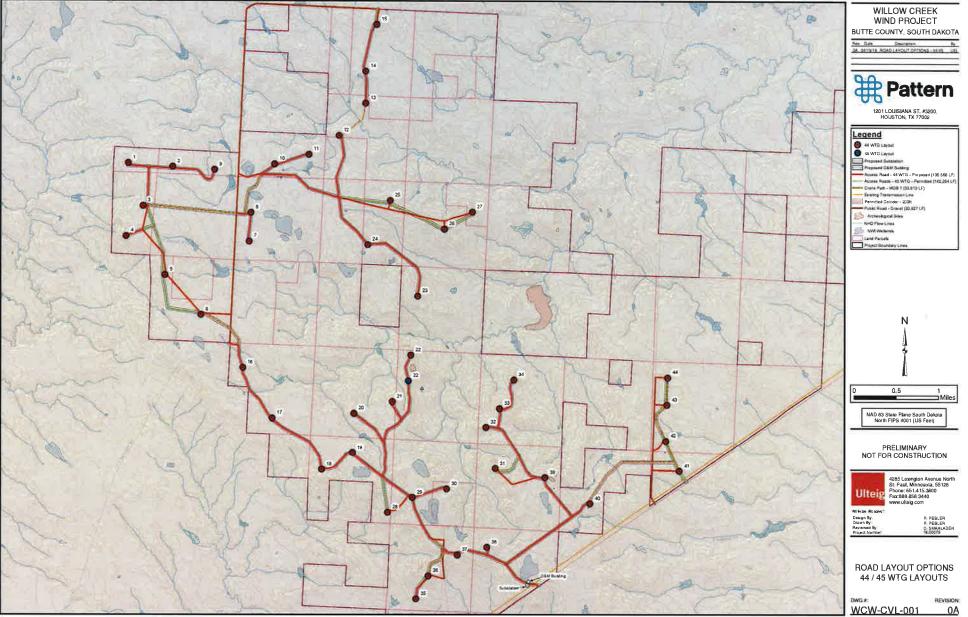
Attachments:

Appendix A - Figures Appendix B - Disturbance Areas Appendix C - Level III Cultural Resources Inventory Reports

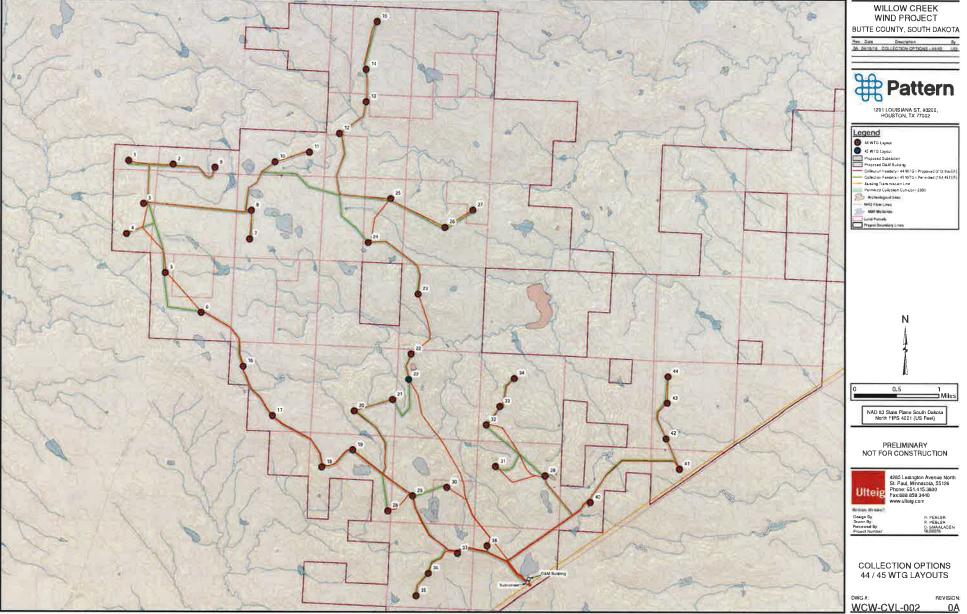
cc: James Madson, Project Development Manager, Pattern Development Allen Wynn, Environmental and Natural Resources Manager, Pattern Development

**APPENDIX A - FIGURES** 

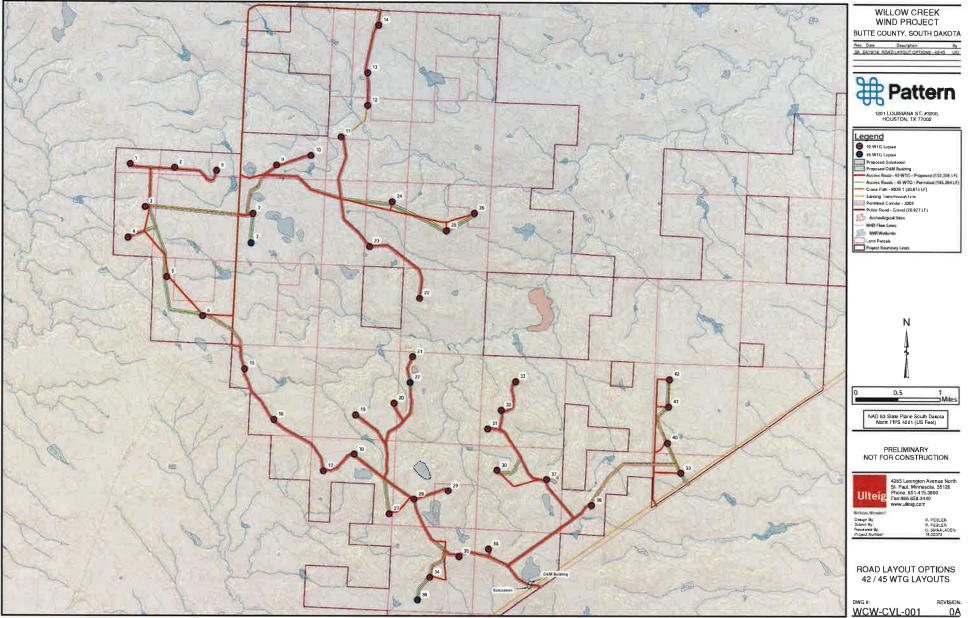
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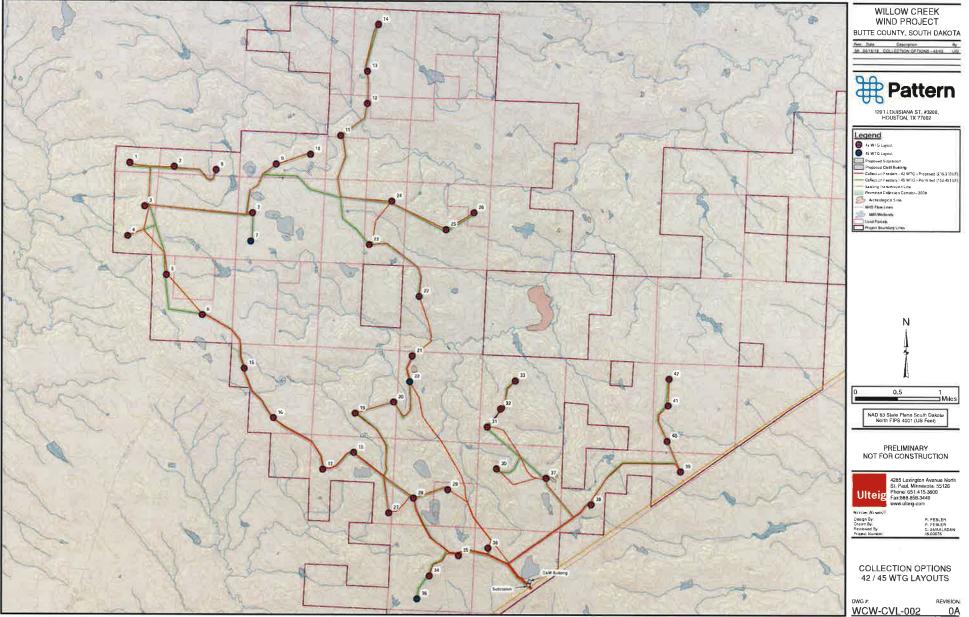
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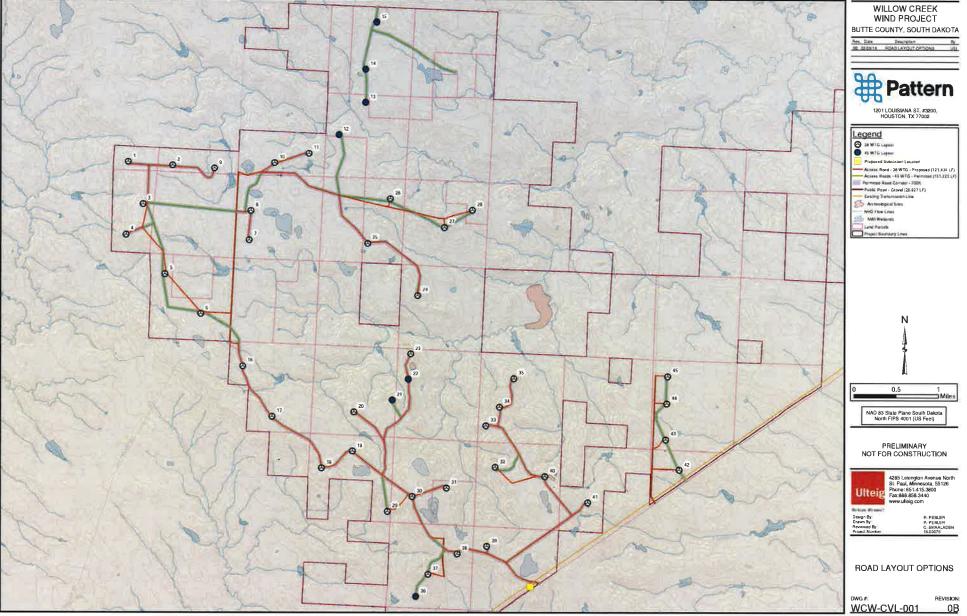
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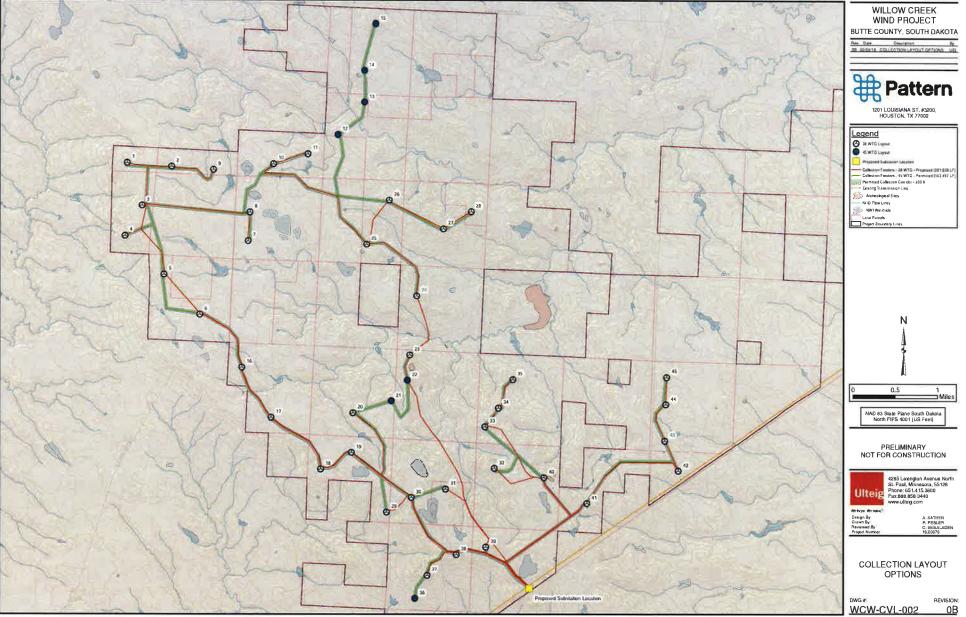
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**APPENDIX B - DISTURBANCE AREAS** 

(a)

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|                              |                             | 45 WT                     | G Layout - EA Design |   |
|------------------------------|-----------------------------|---------------------------|----------------------|---|
|                              |                             | Tem                       | porary Disturbance   |   |
|                              |                             | Temporary disturbance     | Temporary            |   |
|                              |                             | area (or width for linear | disturbance area     |   |
|                              | Number/Length of Facility   | facilities)               | (acres)              | Assumptions / Basis for Calculation   |
| Turbines                     | 45                          | 262 ft X 262 ft           | 71                   | 262 ft by 262 ft construction disturbance area per turbine  |
| Collector Lines              | 139,646 feet                | 10 feet                   | 11                   | 10 ft wide feeder trenching; some is shared with road disturbance   |
| O&M Facility<br>Access Roads | 1<br>137,247 feet           | 11,500 sq. ft.<br>66 feet | 0.3                  | 11,500 sq. ft. construction disturbance area for O&M building and parking<br>66 ft construction disturbance width |
| Willow Creek Substation      | 1                           | 69,000 sq. ft.            | 207                  | 69,000 sq. ft. construction disturbance area for substation   |
| Met Towers                   | 4                           | 420 sq. ft.               | 0.04                 | Four temporary towers; 420 sq. ft. disturbance footprint for each tower   |
| Laydown/stockpile/batchplant | 1                           | 1,742,400 sq. ft.         | 40                   | One 40 acre yard required for Project Area  |
| Crane Walk                   | 137,247 feet                | 20 feet                   | 0                    | Assume within road disturbance  |
| Total Tem                    | porary Disturbance Area (ad | cres)                     | 331.34               |   |

|                                 |                                   | Perm  | anent Disturbance                        |  |
|---------------------------------|-----------------------------------|---|--|--|
|                                 | Number/Length of Facility         | Permanent disturbance<br>area (or width for linear<br>facilities) | Permanent<br>disturbance area<br>(acres) | Assumptions / Basis for Calculation  |
| Turbines                        | 45                                | 66 ft x 66 ft   | 4.5                                      | 60 ft by 60 ft construction disturbance area per turbine   |
| Collector Lines<br>O&M Facility | 139,646 feet                      | 0<br>10,000 sq. ft.   | 0  | Feeder trenching will be reseeded and there will be no permanent disturbanc<br>Includes O&M building and parking |
| Access Roads                    | 137,247 feet                      | 33 feet   | 103                                      | Estimated average road width of 33 ft  |
| Willow Creek Substation         | 1                                 | 60,000 square feet  | 1  | 300 ft by 200 ft substation footprint  |
| Met Towers<br>Total Pe          | 2<br>rmanent Disturbance Area (ac | 420 sq. ft.<br>cres)  | 0.02                                     | Two permanent towers; 420 sq. ft. disturbance footprint for each tower   |

|                                     | 44 WTG Layout - Proposed Design |                           |                    |   |  |  |
|-------------------------------------|---------------------------------|---------------------------|--------------------|---|--|--|
|                                     |                                 | Temj                      | porary Disturbance |   |  |  |
|                                     |                                 | Temporary disturbance     | Temporary          |   |  |  |
|                                     |                                 | area (or width for linear | disturbance area   |   |  |  |
|                                     | Number/Length of Facility       | facilities)               | (acres)            | Assumptions / Basis for Calculation                                       |  |  |
| Turbines                            | 44                              | 262 ft X 262 ft           | 69                 | 262 ft by 262 ft construction disturbance area per turbine                |  |  |
| <ul> <li>Collector Lines</li> </ul> | 212,266 LF                      | 10 ft                     | 48.75              | 10 ft wide feeder trenching; some is shared with road disturbance         |  |  |
| O&M Facility                        | 1                               | 11,500 sq. ft.            | 0.3                | 11,500 sq. ft. construction disturbance area for O&M building and parking |  |  |
| Access Roads                        | 135,668 LF                      | 66 ft                     | 205.5              | 66 ft construction disturbance width                                      |  |  |
| Willow Creek Substation             | 1                               | 69,000 sq. ft.            | 2                  | 69,000 sq. ft. construction disturbance area for substation               |  |  |
| Met Towers                          | 4                               | 420 sq. ft.               | 0.04               | Four temporary towers; 420 sq. ft. disturbance footprint for each tower   |  |  |
| Laydown/stockpile/batchplant        | 1                               | 1,742,400 sq. ft.         | 40                 | One 40 acre yard required for Project Area                                |  |  |
|                                     |                                 |                           |                    | Quantity shown for crane walk outside of road disturbance alignment or    |  |  |
| Crane Walk                          | 2,677 LF                        | 36 ft                     | 2.25               | permitted corridor.   |  |  |
| Total Ten                           | nporary Disturbance Area (ad    | cres)                     | 367.84             |   |  |  |

 $\sim$ 

| Permanent Disturbance                    |                           |   |  |  |
|--|---------------------------|---|--|--|
|  | Number/Length of Facility | Permanent disturbance<br>area (or width for linear<br>facilities) | Permanent<br>disturbance area<br>(acres) | Assumptions / Basis for Calculation  |
| Turbines                                 | 44                        | 66 ft X 66 ft   | 4.4                                      | 60 ft by 60 ft construction disturbance area per turbine                     |
| Collector Lines                          | 212,266 LF                | 0 ft  | 0  | Feeder trenching will be reseeded and there will be no permanent disturbance |
| O&M Facility                             | 1                         | 10,000 sq. ft.  | 0.2                                      | Includes O&M building and parking  |
| Access Roads                             | 135,668 LF                | 33 ft   | 102.75                                   | Estimated average road width of 33 ft  |
| Willow Creek Substation                  | 1                         | 69,000 sq. ft.  | 2  | 300 ft by 200 ft substation footprint  |
| Met Towers                               | 4                         | 420 sq. ft.   | 0.04                                     | Two permanent towers; 420 sq. ft. disturbance footprint for each tower       |
| Total Permanent Disturbance Area (acres) |                           |   | 109.39                                   |  |

|  | States all and            | 42 WTG L                  | ayout - Proposed Desig | gn   |
|--|---------------------------|---------------------------|------------------------|--|
|  |                           | Tem                       | porary Disturbance     |  |
|  |                           | Temporary disturbance     | Temporary              |  |
|  |                           | area (or width for linear | disturbance area       |  |
|  | Number/Length of Facility | facilities)               | (acres)                | Assumptions / Basis for Calculation  |
| Turbines                                 | 42                        | 262 ft X 262 ft           | 66                     | 262 ft by 262 ft construction disturbance area per turbine                                   |
| Collector Lines                          | 216,210 LF                | 10 ft                     | 49.5                   | 10 ft wide feeder trenching; some is shared with road disturbance                            |
| O&M Facility                             | 1                         | 11,500 sq. ft.            | 0.3                    | 11,500 sq. ft. construction disturbance area for O&M building and parkin                     |
| Access Roads                             | 132,359 LF                | 66 ft                     | 200.5                  | 66 ft construction disturbance width   |
| Willow Creek Substation                  | 1                         | 69,000 sq. ft.            | 2                      | 69,000 sq. ft. construction disturbance area for substation                                  |
| Met Towers                               | 4                         | 420 sq. ft.               | 0.04                   | Four temporary towers; 420 sq. ft. disturbance footprint for each tower                      |
| Laydown/stockpile/batchplant             | 1                         | 1,742,400 sq. ft.         | 40                     | One 40 acre yard required for Project Area   |
| Crane Walk                               | 2,677 LF                  | 36ft                      | 2.25                   | Quantity shown for crane walk outside of road disturbance alignment o<br>permitted corridor. |
| Total Temporary Disturbance Area (acres) |                           |                           | 360.59                 |  |

| Permanent Disturbance           |                                  |   |  |   |  |
|---------------------------------|----------------------------------|---|--|---|--|
|                                 | Number/Length of Facility        | Permanent disturbance<br>area (or width for linear<br>facilities) | Permanent<br>disturbance area<br>(acres) | Assumptions / Basis for Calculation   |  |
| Turbines                        | 42                               | 66 ft X 66 ft   | 4.2                                      | 60 ft by 60 ft construction disturbance area per turbine                    |  |
| Collector Lines<br>O&M Facility | 144,724 LF                       | 0 ft<br>10,000 sg. ft.  | 0  | Feeder trenching will be reseeded and there will be no permanent disturbanc |  |
| Access Roads                    | 132,359 LF                       | 33 ft   | 100.25                                   | Includes O&M building and parking<br>Estimated average road width of 33 ft  |  |
| Willow Creek Substation         | 1                                | 69,000 sq. ft.  | 2  | 300 ft by 200 ft substation footprint                                       |  |
| Met Towers                      | 4<br>manent Disturbance Area (ac | 420 sq. ft.   | 0.04                                     | Two permanent towers; 420 sq. ft. disturbance footprint for each tower      |  |

| 38 WTG Layout - Proposed Design          |                           |                           |                  |   |  |  |
|--|---------------------------|---------------------------|------------------|---|--|--|
| Temporary Disturbance                    |                           |                           |                  |   |  |  |
|  |                           | Temporary disturbance     | Temporary        |   |  |  |
|  |                           | area (or width for linear | disturbance area |   |  |  |
|  | Number/Length of Facility | facilities)               | (acres)          | Assumptions / Basis for Calculation   |  |  |
| Turbines                                 | 38                        | 262 ft X 262 ft           | 60               | 262 ft by 262 ft construction disturbance area per turbine  |  |  |
| Collector Lines                          | 201,039 LF                | 10 ft                     | 46               | 10 ft wide feeder trenching; some is shared with road disturbance   |  |  |
| O&M Facility<br>Access Roads             | 1<br>121,434 LF           | 11,500 sq. ft.<br>66 ft   | 0.3              | 11,500 sq. ft. construction disturbance area for O&M building and parking<br>66 ft construction disturbance width |  |  |
| Willow Creek Substation                  | 1                         | 69,000 sq. ft.            | 2                | 69,000 sq. ft. construction disturbance area for substation   |  |  |
| Met Towers                               | 4                         | 420 sq. ft.               | 0.04             | Four temporary towers; 420 sq. ft. disturbance footprint for each tower   |  |  |
| Laydown/stockpile/batchplant             | 1                         | 1,742,400 sq. ft.         | 40               | One 40 acre yard required for Project Area  |  |  |
| Crane Walk                               | 121,434 LF                | 20 ft                     | 0                | Assume within road disturbance  |  |  |
| Total Temporary Disturbance Area (acres) |                           |                           | 332.34           |   |  |  |

| Permanent Disturbance           |                                  |                        |  |   |  |
|---------------------------------|----------------------------------|------------------------|--|---|--|
| Tubius                          | Number/Length of Facility        |                        | Permanent<br>disturbance area<br>(acres) | Assumptions / Basis for Calculation   |  |
| Turbines                        | - 38                             | 66 ft X 66 ft          | 3.8                                      | 60 ft by 60 ft construction disturbance area per turbine  |  |
| Collector Lines<br>O&M Facility | 201,039 LF                       | 0 ft<br>10,000 sq. ft. | 0  | Feeder trenching will be reseeded and there will be no permanent disturbance<br>Includes O&M building and parking |  |
| Access Roads                    | 121,434 LF                       | 33 ft                  | 92                                       | Estimated average road width of 33 ft   |  |
| Willow Creek Substation         | 1                                | 69,000 sq. ft.         | 2  | 300 ft by 200 ft substation footprint   |  |
| Met Towers<br>Total Per         | 4<br>manent Disturbance Area (ad | 420 sq. ft.<br>cres)   | 0.04<br>98.04                            | Two permanent towers; 420 sq. ft. disturbance footprint for each tower  |  |

## **APPENDIX C - LEVEL III CULTURAL RESOURCES INVENTORY REPORTS**

(submitted under separate cover)