

EXHIBIT B



Department of Energy
Western Area Power Administration
Upper Great Plains Customer Service Region
P.O. Box 35800
Billings, MT 59107-5800

B0401.BL

OCT 01 2018

Mr. C. Paul Callahan
Burns & McDonnell
9785 Maroon Circle
Suite 400
Centennial, CO 80112

Dear Mr. Callahan:

This letter responds to your correspondence from June 26, 2018, regarding layout updates to the Willow Creek Wind Energy Facility (Project), a proposed 103.5 megawatt wind facility to be located in Butte County, South Dakota. Pattern Renewables 2 LP (Pattern) proposes to interconnect the Project to Western Area Power Administration's (WAPA) Maurine to Rapid City 115-kilovolt (kV) Transmission Line via a new switchyard 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 Environmental Assessment (DOE/EA-2016) to consider the interconnection request and analyze the potential environmental impacts of the proposed Project. The EA identified no significant impacts to environmental resources resulting from either WAPA's Federal action or the proposed Project. On November 10, 2016, WAPA issued a Finding of No Significant Impact and approved the Final EA.

Pattern is proposing changes to the Project layout from what was analyzed in the 2016 EA. Proposed changes include fewer, larger turbines; a revised electrical collection system layout; new operations and maintenance building location; and a revised access road layout.

When WAPA considers a change to a previously analyzed proposed action, or new information relevant to the action becomes available, WAPA must determine whether to supplement the existing NEPA documentation, whether new NEPA documentation is required, or whether the existing NEPA documentation is adequate. Criteria for determining the need for supplemental analysis are specified in the Council on Environmental Quality regulations for implementing NEPA (40 CFR 1502.9(c)) and in the Department of Energy NEPA regulations (10 CFR 1021.314).

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Changes in the proposed action

Pattern 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 addition to the proposed changes in turbine type, Pattern is proposing a revised electrical collection line and access road layout. Pattern is also proposing to move the operations and maintenance building location from the north end of the Project to the south end.

New circumstances or information

The effects associated with the Project modifications are presented in the table below:

Resource Area	Proposed Action: 2016 EA	Proposed Action: 2018 ¹
Land Cover/Land Use	Approximately 331 acres of temporary loss and 109 acres of long-term loss of agricultural land. Of the 45 proposed wind turbines, 29 would be constructed in rangeland, 3 in cropland/hayland, and 13 in Conservation Reserve Program (CRP) lands.	Up to an additional 37 acres of temporary disturbance of agricultural land. No increase in the acres of long-term loss. Of the 44 proposed wind turbines, 28 would be constructed in rangeland, 3 in cropland/hayland, and 13 in CRP lands.
Geologic Setting/Soil Resources	Approximately 331 acres of temporary soil disturbance and 109 acres of soil surface permanently removed.	An additional 37 acres of temporary soil disturbance.
Water Resources	Turbines, access roads, and collector system avoid streams and wetlands.	Revised road layout avoids streams and wetlands. Revised collection layout will bore underneath streams and wetlands with no impact.
Air quality/Climate	Short-term air emissions from construction activities. Project could avoid 4 to 24 percent of air emissions from displaced fossil-fueled power generation.	No change.
Noise	Predicted sound level at nearest residence to a turbine is 43.3 dBA, within the range of typical sound levels for rural areas (33 to 47 dBA).	Revised turbine technology would cause additional impacts to two residences. Predicted sound level at nearest residence (a participating landowner) is 46.9 dBA, within the range of typical sound levels for rural areas. Predicted sound level at the other residence is 29.7 dBA.
Ecological	Approximately 331 acres of temporary disturbance and 109 acres of permanent disturbance	An additional 37 acres of temporary disturbance to wildlife habitat (vegetation).

	to vegetation. Project may affect, but is not likely to adversely effect , the whooping crane and northern long-eared bat.	<p>Although fewer towers could reduce risk of avian and bat mortality, different tower heights would alter the risks: a slight reduction in impacts to low-flying, ground nesting birds and a slight increase in impacts to higher flying species are anticipated.</p> <p>Larger rotor diameter by 72 feet, which increases the wind swept area by causes the wind swept area to increase by 106,750 square meters (from 411,471 square meters to 518,221).</p> <p>Project may affect, but is not likely to adversely effect, the whooping crane and northern long-eared bat.</p>
Visual	<p>Introduction of vertical lines of 45 wind turbines into the generally horizontal landscape. Visual impacts to scenic resources not anticipated. Nearest proposed turbine to Belle Fourche National Wildlife Refuge is 20 miles, and nearest proposed turbine to Bear Butte is 26 miles.</p>	<p>Fewer turbines along the horizontal landscape, but turbines could be up to 59 feet taller, which would increase the visibility of the project from surrounding residences. Visual impacts to scenic resources (Belle Fourche National Wildlife Refuge and Bear Butte) will remain unchanged.</p>
Paleontological	<p>Best Management Practices and conservation measures would implemented to minimize potential paleontological resources impacts.</p>	<p>No change.</p>
Cultural	<p>Project avoids National Register of Historic Places (NRHP) eligible and unevaluated properties. Notification and protection protocols would be followed if unanticipated cultural resources are found during construction.</p>	<p>Cultural resources surveys were conducted for the revised layout in December 2017 and April 2018. An historic period cultural resource, site 39BU0554, was discovered during pedestrian survey of the proposed collector line reroutes. No cultural sites were discovered during the pedestrian survey of the proposed access road reroutes. Notification and protection protocols would be followed if unanticipated cultural resources are found during construction. SHPO concurred with WAPA's determination of "no adverse effect" on August 6th, 2018.</p>

Socioeconomics	Project would result in short-term and long-term positive economic impacts from job creation, project payments, and tax revenue.	No change.
Environmental Justice	No disproportionately high and adverse human health or environmental effects are expected.	No change.
Cumulative Impacts	Incremental contribution of impacts to ecological and visual resources. However, impacts to resources have been avoided or minimized during siting and design, as well as implementation of conservation measures.	No change.
¹ Pattern has proposed to implement one of three turbine technologies. Resource impacts would vary slightly based upon the technology selected. For comparison purposes, WAPA evaluated the maximum potential effect for each resource area. As a result, the actual impact to resource areas may be less than what is presented in this table, depending upon the technology selected.		

Conclusion

WAPA has reviewed the proposed changes to the Project and determined the changes are not substantially relevant to environmental concerns, and there are no new significant circumstances or information relevant to environmental concerns or having bearing on the proposed action. Thus, a supplemental analysis is not required and no further NEPA documentation will be prepared.

WAPA requires that Project applicants coordinate with the U.S. Fish and Wildlife Service (USFWS) to avoid and minimize impacts to eagles. In this regard, Pattern should notify the USFWS of Project revisions and discuss whether additional measures should be taken to protect eagle populations.

Thank you for your diligence in protecting the environment and complying with NEPA. If you have questions or wish to discuss this matter further, please contact Matt Marsh, Environmental Manager, at (406) 255-2810 or mmarsh@wapa.gov, or Christina Gomer, NEPA Coordinator, at (406) 255-2811 or gomer@wapa.gov.

Sincerely,

Jody S. Sundsted

Jody Sundsted
Senior Vice President
and Regional Manager

cc:

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