



April 22, 2021

Mr. Tom Kallemeyn
Florida Department of Environmental Protection
Northeast District
8800 Baymeadows Way West
Jacksonville, Florida 32256
Submitted via email to DEP_NED@FloridaDEP.gov, Thomas.Kallemeyn@FloridaDEP.gov

Re: Florida Power & Light Company North Florida Resiliency Connection
Permit No's. 12-0378587-001, 010; Request for Minor Modification

Dear Mr. Kallemeyn:

The North Florida Resiliency Connection was originally permitted in July 2020 and subsequently transferred to Florida Power & Light Company (FPL) on April 21, 2021. Certain engineering design changes and construction technique refinements have been proposed which change the impacts associated with construction of the transmission line. These refinements include the provision to underground the permitted overhead facilities at four locations using horizontal directional drilling (HDD), including one location beneath wetlands. Attachment A presents a location map of the proposed HDD locations.

Because the proposed new construction technique at the one wetland location results in reduction of impacts to wetlands without changing the applicable conditions, we believe these changes qualify as a minor modification to the environmental resource permit (ERP). More specifically, the proposed HDD activities beneath the wetland have been designed to meet the criteria under Chapter 62-330.453 Florida Administrative Code (General Permit for Installation, Maintenance, Repair, and Removal of Underground Utility Lines). FPL respectfully submits the revised design and impact information to update the record and more accurately reflect the wetland impacts associated with construction of the permitted project. Further, given there is no dredge or discharge into State-assumed 404 waters, activities associated with the proposed modification are not considered regulated activities.

Attachment A contains the proposed four HDD locations, including construction details for the one location beneath wetlands. Attachment B is a map of the HDD location beneath wetlands and depicts the reduced wetland impacts both in illustration and table format. Attachment C provides the detailed inadvertent release plan for the HDD activities.

The updated project design and construction method, as depicted in Attachments A and B, results in a 0.82-acre reduction of permitted wetland impacts associated with the project. The change in impacts associated with the proposed refinements consist of the reduction of temporary construction impacts to 0.03 acres of forested wetland and 0.13 acres of non-forested wetland as well as the avoidance of 0.53 acres of permanent conversion of forested to non-forested wetland and the reduction of 0.13 acres of permanently maintained non-forested wetland.

Additional to the requested modifications above, FPL respectfully requests the easement acreage of Crooked Creek be changed in the State Lands table included in the ERP permit. The correct easement acreage for Crooked Creek contains 0.064 acre (2,776 sq.ft.) instead of 0.021 acre (915 sq.ft.).

We respectfully request the refinements to construction technique be accepted as a minor modification to the existing ERP. The application fee \$250 will be submitted under a separate cover. If you have any questions or concerns, please contact me at 561-904-3730 or via email at Benny.Luedike@fpl.com or Ms. Jude Dawson at ECT Inc. via email at JDawson@ectinc.com.

Sincerely,



Benny Luedike
Environmental Manager

cc:

Kimberly Pearce, FDEP NED ERP, Kimberly.Pearce@FloridaDEP.gov

Franck Leblanc, FPL, Franck.L.Leblance@fpl.com

Brian Yates, FPL, Brian.Yates@fpl.com

Jude Dawson, ECT, jdawson@ectinc.com

Enclosures

Attachment A—NFRC HDD Crossings Exhibit

Attachment B—Wetland Impact Map with Table

Attachment C—Inadvertent Release Plan

Attachment A—NFRC HDD Crossings Exhibit



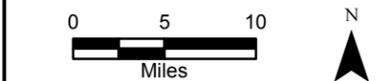
HDD Location	Latitude	Longitude
1	30.315607	-82.939654
2	30.353297	-83.167056
3	30.359682	-83.200090
4	30.473120	-83.830920

- LEGEND**
- Substation
 - HDD
 - Project Boundary

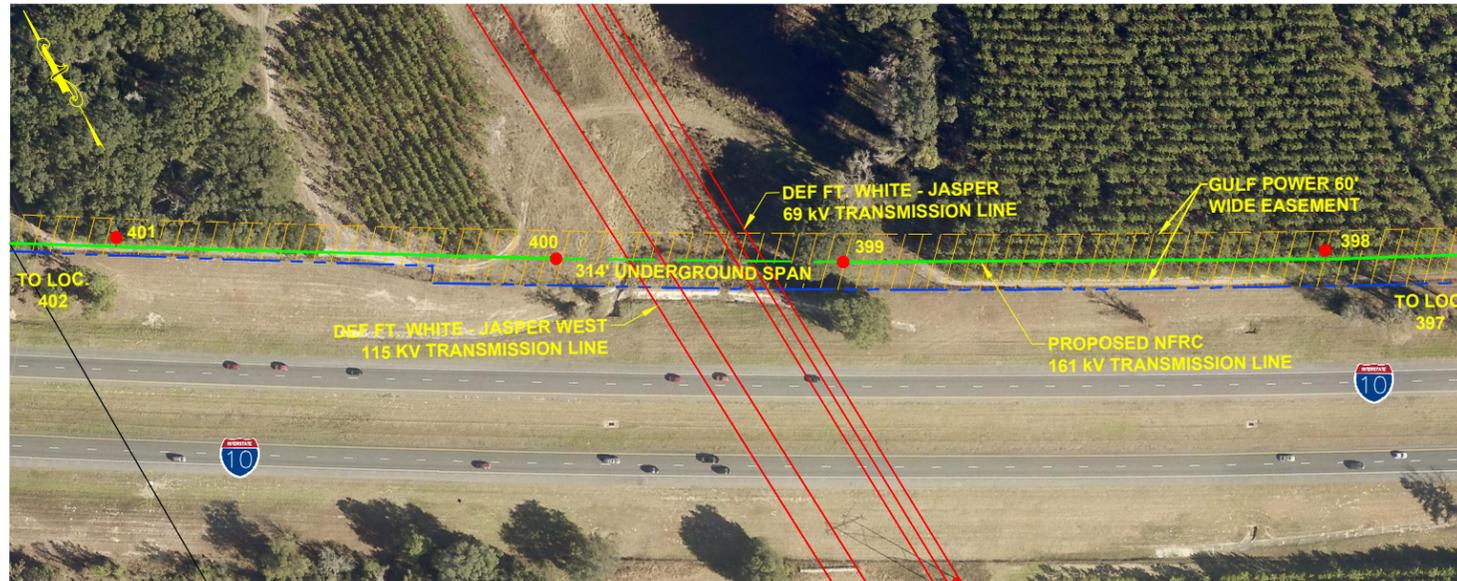


**FIGURE 1
HDD LOCATION MAP**

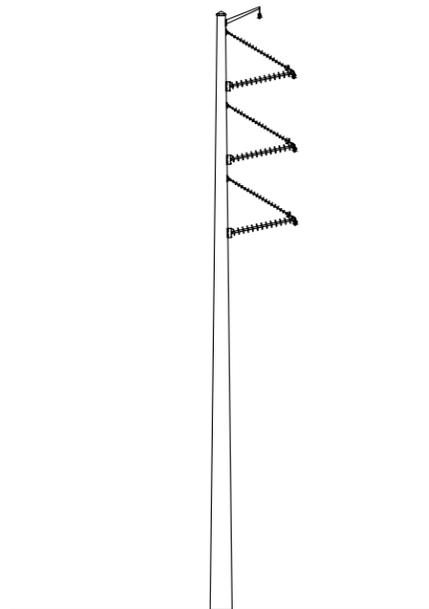
SCALE: 1 in = 10 miles
 FILE NAME: NFRC_HDD_Location
 DRAWN BY: unash
 DATE: 4/13/2021 3:13:43 PM



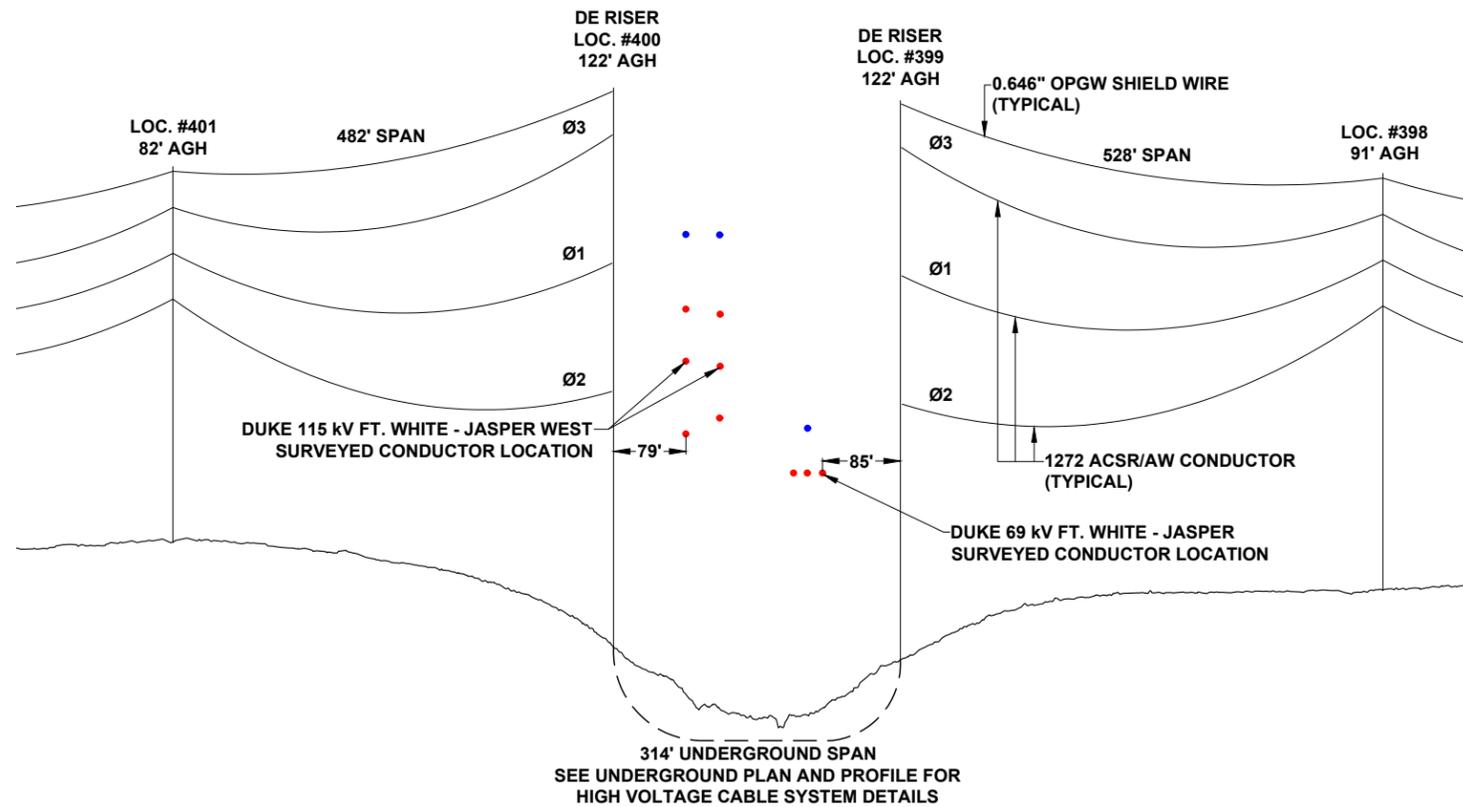
HDD Location #1
(No Wetlands)



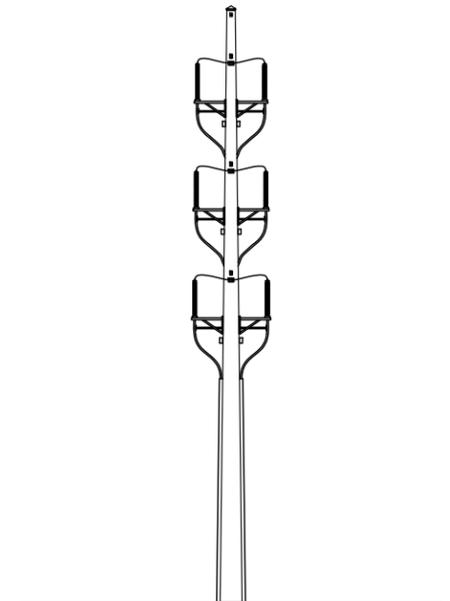
CROSSING DUKE 115 kV FT. WHITE - JASPER & FT. WHITE - JASPER WEST
PLAN VIEW



161 kV A-251896
LOCATIONS #398 & #401
PROFILE VIEW
SCALE: N.T.S.



CROSSING DUKE 115 kV FT. WHITE - JASPER & FT. WHITE - JASPER WEST
PROFILE VIEW
HORIZONTAL SCALE: 1" = 200'
VERTICAL SCALE: 1" = 40'



161 kV RISER
LOCATIONS #399 & #400
PROFILE VIEW
SCALE: N.T.S.

- NOTES:
1. SURVEY BOUNDARIES AND WETLAND DELINEATION PROVIDED BY OTHERS.
 2. MINIMUM CLEARANCES SHOWN ARE FPL DESIGN MINIMUMS AND MAY INCREASE.

LEGEND		
	PROPOSED LINE	1160 TRANSMISSION POLE TO BE INSTALLED
	PROPOSED UNDERGROUND LINE	EXISTING UTILITY POLE TO REMAIN
	NEW EASEMENT REQUIRED	EXISTING UTILITY POLE TO BE REPLACED
	PROPERTY LINE	TRANSMISSION CROSSING
	ROAD ROW	

PROFILE LEGEND	
	EXISTING CONDUCTOR
	EXISTING SHIELD WIRE

NOTICE:
CONTRACTOR SHALL VERIFY ALL CONDITIONS ON JOB SITE & NOTIFY PROJECT MANAGER AND ENGINEER OF ANY VARIATIONS FROM DIMENSIONS SHOWN ON THESE DRAWINGS BEFORE PROCEEDING WITH ANY CONSTRUCTION.



PICKETT
PICKETT AND ASSOCIATES, INC.
5010 WEST NASSAU STREET
TAMPA, FLORIDA 33607
(813) PHONE: 877-7770
C.A. #31323 L.B. #364

FLORIDA POWER & LIGHT COMPANY

SCALE: 1" = 200'
DRAWN BY: JRT
ENGINEER: JRC
COUNTY: SUWANNEE
SHEET 9 OF 26

DATE: 03/02/21
CHECKED BY: BDP
SECTION: 36-01S-11E
FILE NAME: DukeTransmissionExhibits.dwg
CROSSING: #8

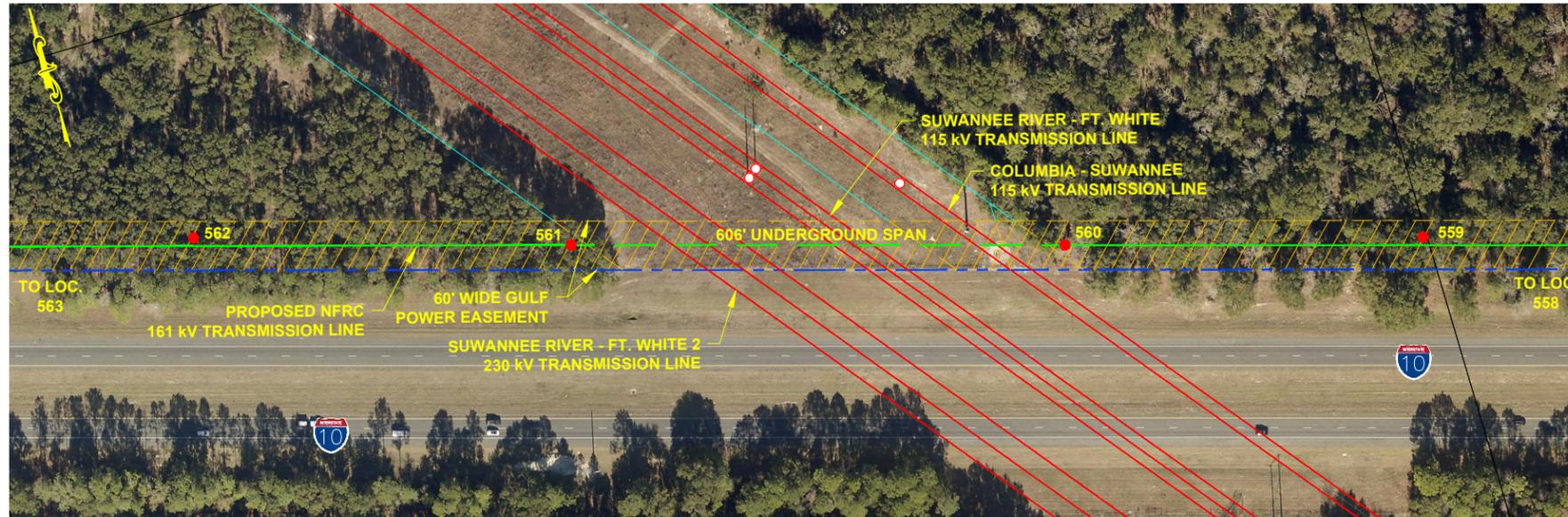
REV	DATE	DESCRIPTION	BY	CHKD	APP
1	03/02/21	ISSUED FOR CONSTRUCTION	GAG	JCF	JRC

NORTH FLORIDA RESILIENCY CONNECTION

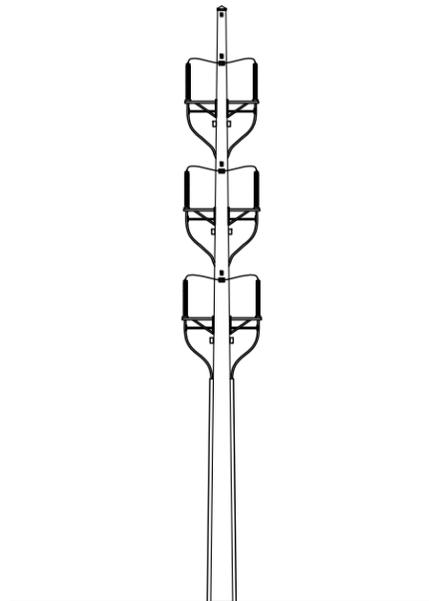


TRANSMISSION CROSSING EXHIBIT
FPL 038406
20210013-ET

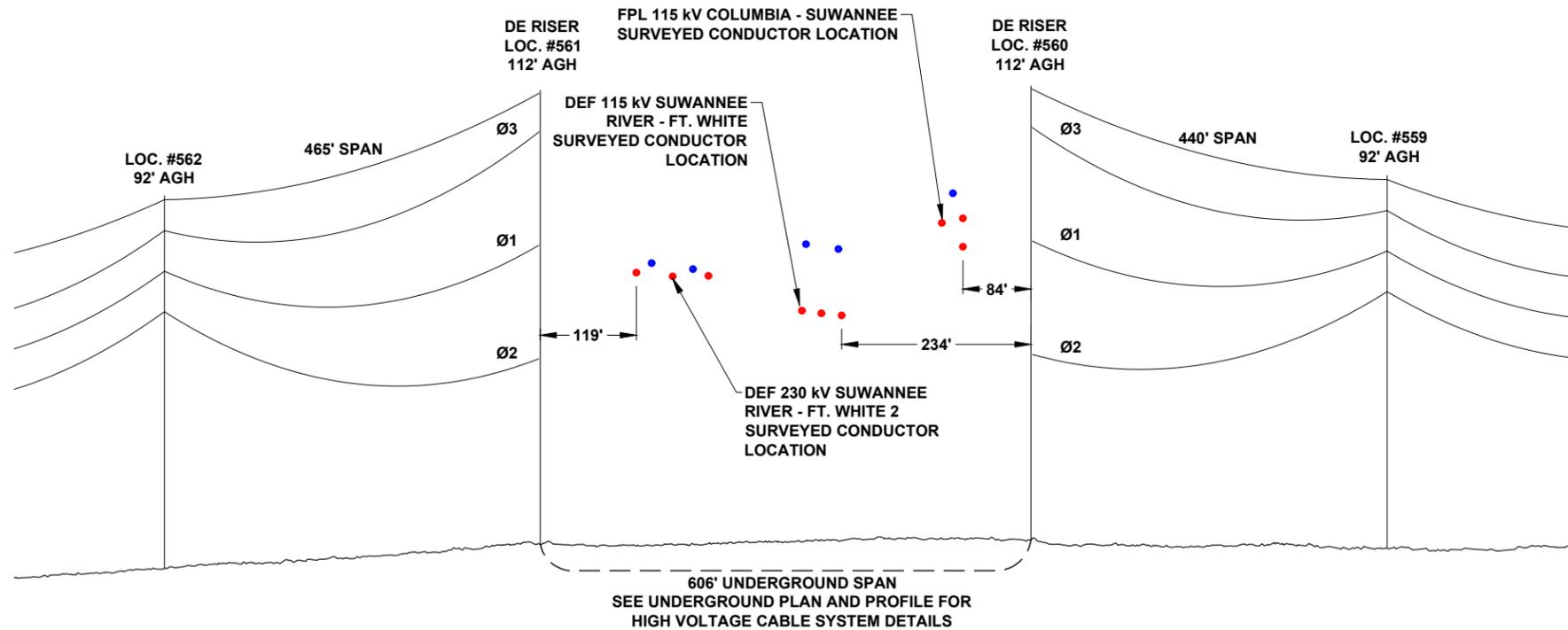
HDD Location #2
(No Wetlands)



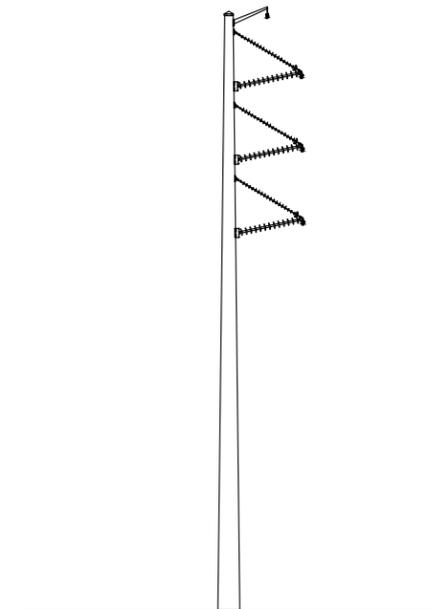
**CROSSING FPL 115 kV COLUMBIA - SUWANNEE
CROSSING DUKE 230 kV SUWANNEE RIVER - FT. WHITE & SUWANNEE RIVER - FT. WHITE 2**
PLAN VIEW



161 kV RISER
LOCATIONS #560 & #561
PROFILE VIEW
SCALE: N.T.S.



**CROSSING FPL 115 kV COLUMBIA - SUWANNEE
CROSSING DUKE 230 kV SUWANNEE RIVER - FT. WHITE & SUWANNEE RIVER - FT. WHITE 2**
PROFILE VIEW
HORIZONTAL SCALE: 1" = 200'
VERTICAL SCALE: 1" = 40'



161 kV A-251896
LOCATIONS #559 & #562
PROFILE VIEW
SCALE: N.T.S.

- NOTES:
1. SURVEY BOUNDARIES AND WETLAND DELINEATION PROVIDED BY OTHERS.
 2. MINIMUM CLEARANCES SHOWN ARE FPL DESIGN MINIMUMS AND MAY INCREASE.

LEGEND		
	PROPOSED LINE	1160 TRANSMISSION POLE TO BE INSTALLED
	PROPOSED UNDERGROUND LINE	EXISTING UTILITY POLE TO REMAIN
	NEW EASEMENT REQUIRED	EXISTING UTILITY POLE TO BE REPLACED
	PROPERTY LINE	TRANSMISSION CROSSING
	ROAD ROW	

PROFILE LEGEND	
	EXISTING CONDUCTOR
	EXISTING SHIELD WIRE

NOTICE:
CONTRACTOR SHALL VERIFY ALL CONDITIONS ON JOB SITE & NOTIFY PROJECT MANAGER AND ENGINEER OF ANY VARIATIONS FROM DIMENSIONS SHOWN ON THESE DRAWINGS BEFORE PROCEEDING WITH ANY CONSTRUCTION.



PICKETT
PICKETT AND ASSOCIATES, INC.
5010 WEST NASSAU STREET
TAMPA, FLORIDA 33607
(813) PHONE: 877-7770
C.A. #31323 L.B. #364

FLORIDA POWER & LIGHT COMPANY

SCALE: 1" = 200'
DRAWN BY: JRT
ENGINEER: JRC
COUNTY: SUWANNEE
SHEET 10 OF 26

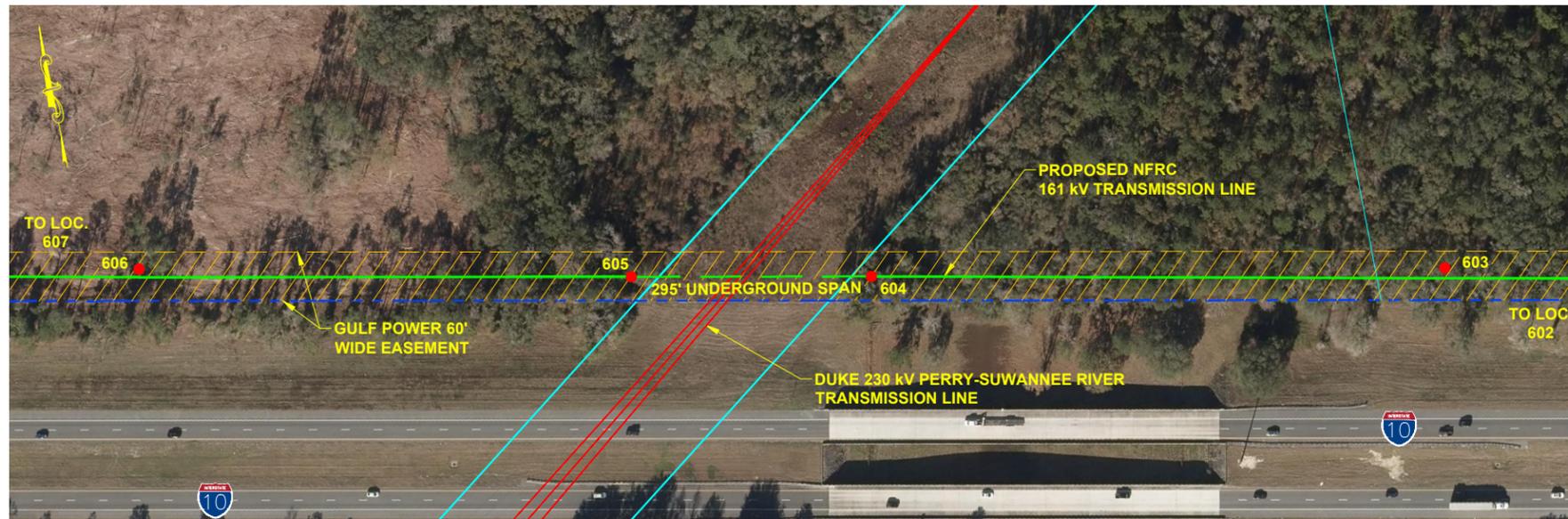
DATE: 03/02/21
CHECKED BY: BDP
SECTION: 36-01S-11E
FILE NAME: FPL_TransmissionExhibits.dwg
CROSSING: #9

REV	DATE	DESCRIPTION	BY	CHKD	APP
1	03/02/21	ISSUED FOR CONSTRUCTION	GAG	BDP	JRC

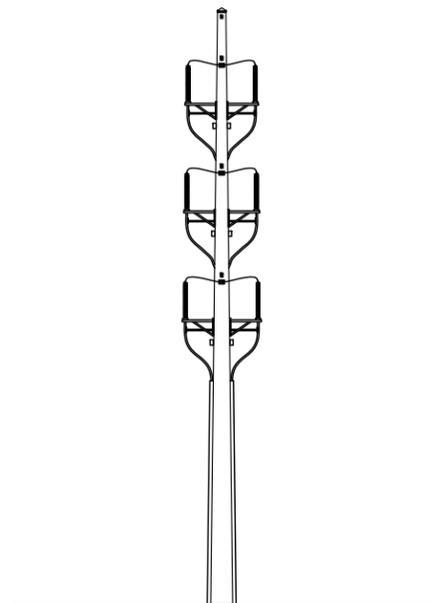
NORTH FLORIDA RESILIENCY CONNECTION

TRANSMISSION CROSSING EXHIBIT
FPL 038407
20210013-01

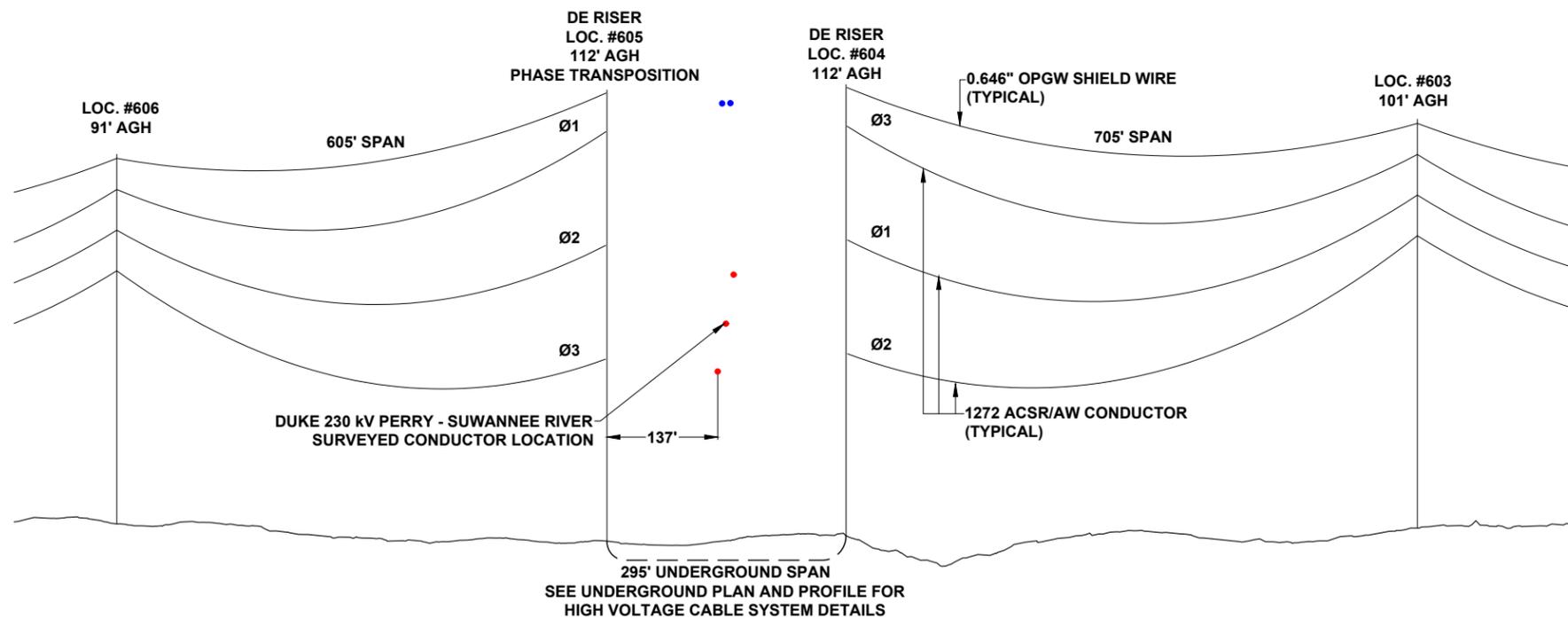
HDD Location #3
(No Wetlands)



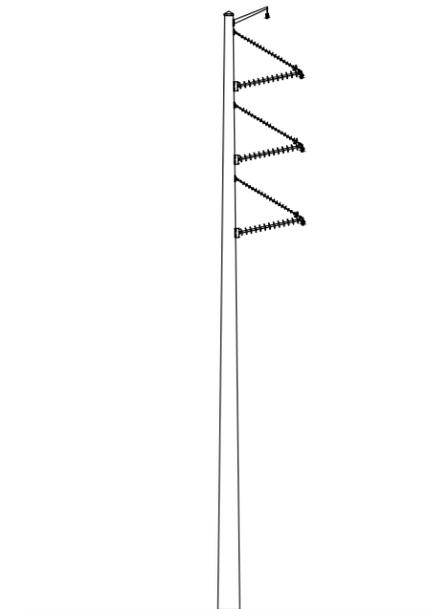
CROSSING DUKE 230 kV PERRY - SUWANNEE RIVER
PLAN VIEW



161 kV RISER
LOCATIONS #604 & #605
PROFILE VIEW
SCALE: N.T.S.



CROSSING DUKE 230 kV PERRY - SUWANNEE RIVER
PROFILE VIEW
SCALE: N.T.S.



161 kV A-251896
LOCATIONS #603 & #606
PROFILE VIEW
SCALE: N.T.S.

- NOTES:
1. SURVEY BOUNDARIES AND WETLAND DELINEATION PROVIDED BY OTHERS.
 2. MINIMUM CLEARANCES SHOWN ARE FPL DESIGN MINIMUMS AND MAY INCREASE.

LEGEND		
	PROPOSED LINE	1160 TRANSMISSION POLE TO BE INSTALLED
	PROPOSED UNDERGROUND LINE	EXISTING UTILITY POLE TO REMAIN
	NEW EASEMENT REQUIRED	EXISTING UTILITY POLE TO BE REPLACED
	PROPERTY LINE	TRANSMISSION CROSSING
	ROAD ROW	

PROFILE LEGEND	
	EXISTING CONDUCTOR
	EXISTING SHIELD WIRE

NOTICE:
CONTRACTOR SHALL VERIFY ALL CONDITIONS ON JOB SITE & NOTIFY PROJECT MANAGER AND ENGINEER OF ANY VARIATIONS FROM DIMENSIONS SHOWN ON THESE DRAWINGS BEFORE PROCEEDING WITH ANY CONSTRUCTION.



PICKETT
PICKETT AND ASSOCIATES, INC.
5010 WEST NASSAU STREET
TAMPA, FLORIDA 33607
(813) PHONE: 877-7770
C.A. #31323 L.B. #364

FLORIDA POWER & LIGHT COMPANY

SCALE: 1" = 200'
DRAWN BY: JRT
ENGINEER: JRC
COUNTY: MADISON
SHEET 11 OF 26

REV	DATE	DESCRIPTION	BY	CHKD	APP
1	03/02/21	ISSUED FOR CONSTRUCTION	GAG	JCF	JRC

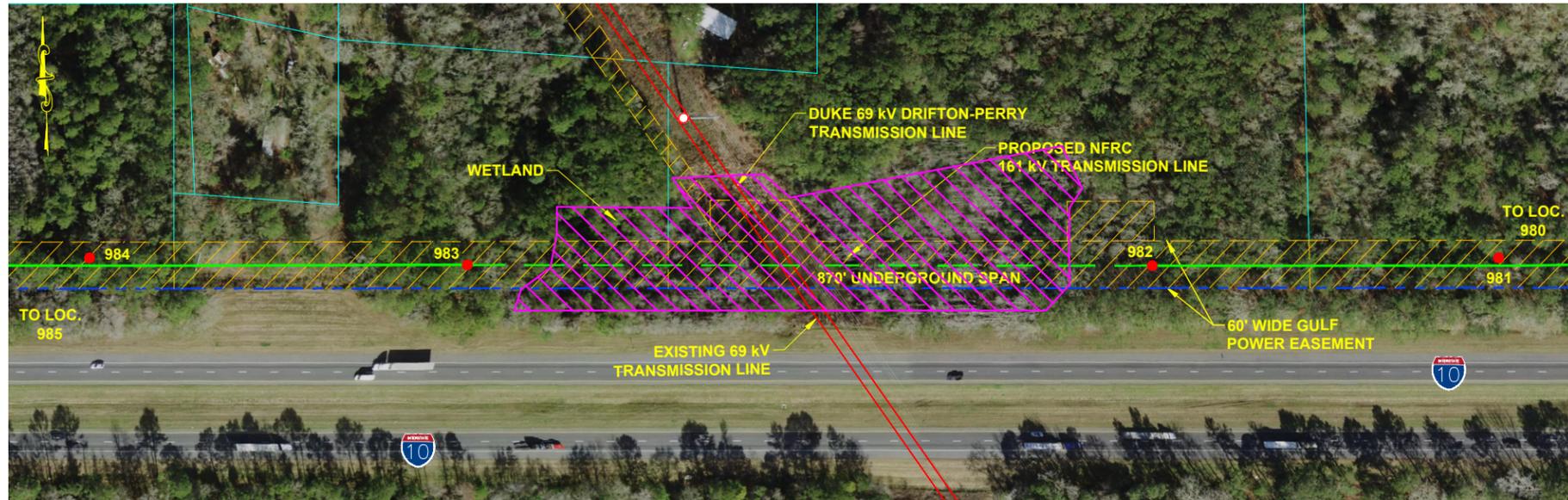
DATE: 03/02/21
CHECKED BY: JCF
SECTION: 34-01S-11E
FILE NAME: DukeTransmissionExhibits.dwg
CROSSING: #10

NORTH FLORIDA RESILIENCY CONNECTION

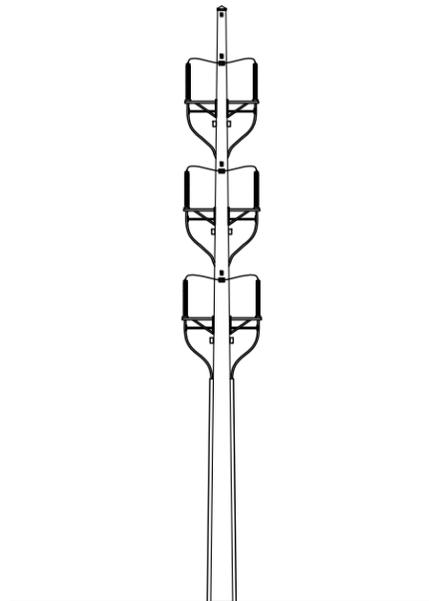


TRANSMISSION CROSSING EXHIBIT
FPL 038408
20210013-ET

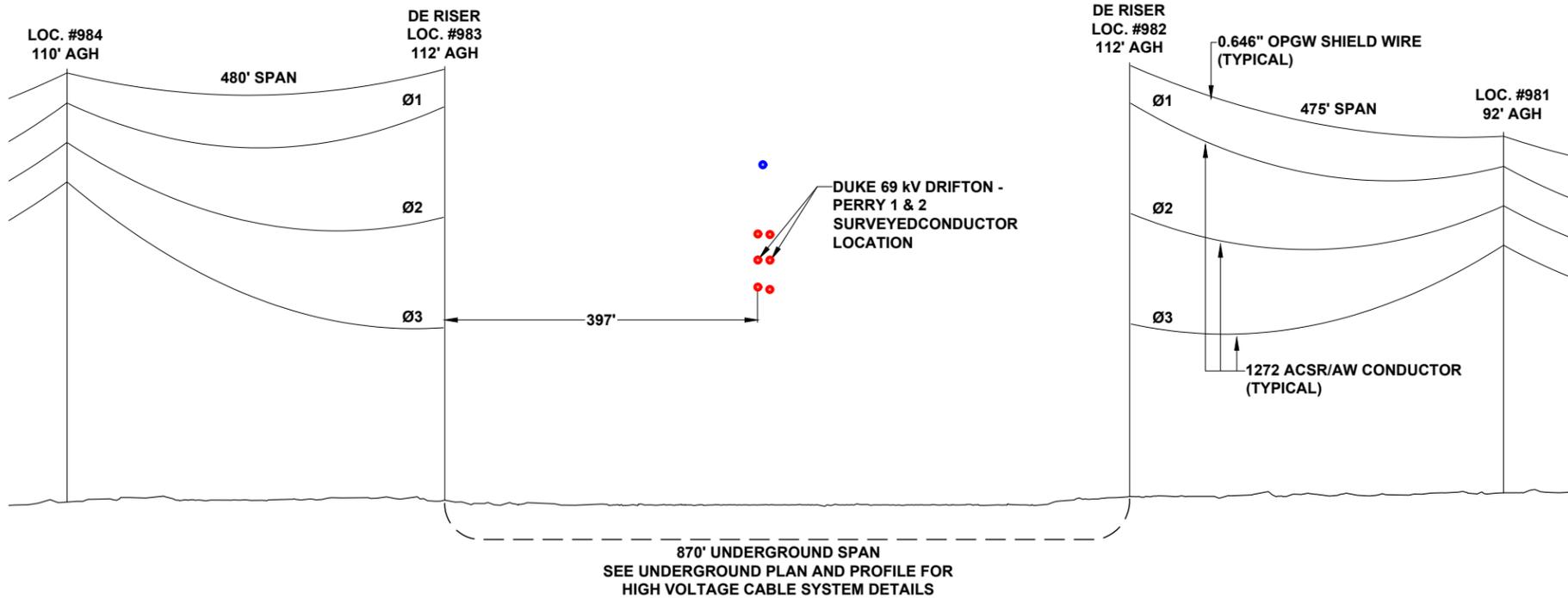
HDD Location #4



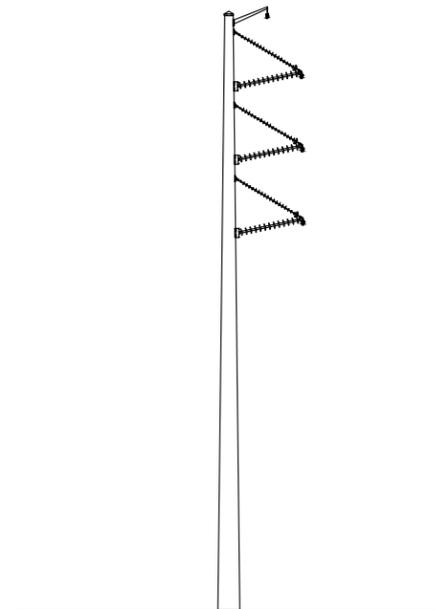
CROSSING DUKE 69 kV DRIFTON - PERRY PLAN VIEW



161 kV RISER
LOCATIONS #982 & #983
PROFILE VIEW
SCALE: N.T.S.



CROSSING DUKE 69 kV DRIFTON - PERRY PROFILE VIEW HORIZONTAL SCALE: 1" = 200' VERTICAL SCALE: 1" = 40'



161 kV A-251896
LOCATIONS #981 & #984
PROFILE VIEW
SCALE: N.T.S.

- NOTES:**
1. SURVEY BOUNDARIES AND WETLAND DELINEATION PROVIDED BY OTHERS.
 2. MINIMUM CLEARANCES SHOWN ARE FPL DESIGN MINIMUMS AND MAY INCREASE.

LEGEND		
	PROPOSED LINE	1160 TRANSMISSION POLE TO BE INSTALLED
	PROPOSED UNDERGROUND LINE	EXISTING UTILITY POLE TO REMAIN
	NEW EASEMENT REQUIRED	EXISTING UTILITY POLE TO BE REPLACED
	PROPERTY LINE	TRANSMISSION CROSSING
	ROAD ROW	

PROFILE LEGEND	
	EXISTING CONDUCTOR
	EXISTING SHIELD WIRE

NOTICE:
CONTRACTOR SHALL VERIFY ALL CONDITIONS ON JOB SITE & NOTIFY PROJECT MANAGER AND ENGINEER OF ANY VARIATIONS FROM DIMENSIONS SHOWN ON THESE DRAWINGS BEFORE PROCEEDING WITH ANY CONSTRUCTION.



PICKETT
PICKETT AND ASSOCIATES, INC.
5010 WEST NASSAU STREET
TAMPA, FLORIDA 33607
(813) PHONE: 877-7770
C.A. #31323 L.B. #364

FLORIDA POWER & LIGHT COMPANY

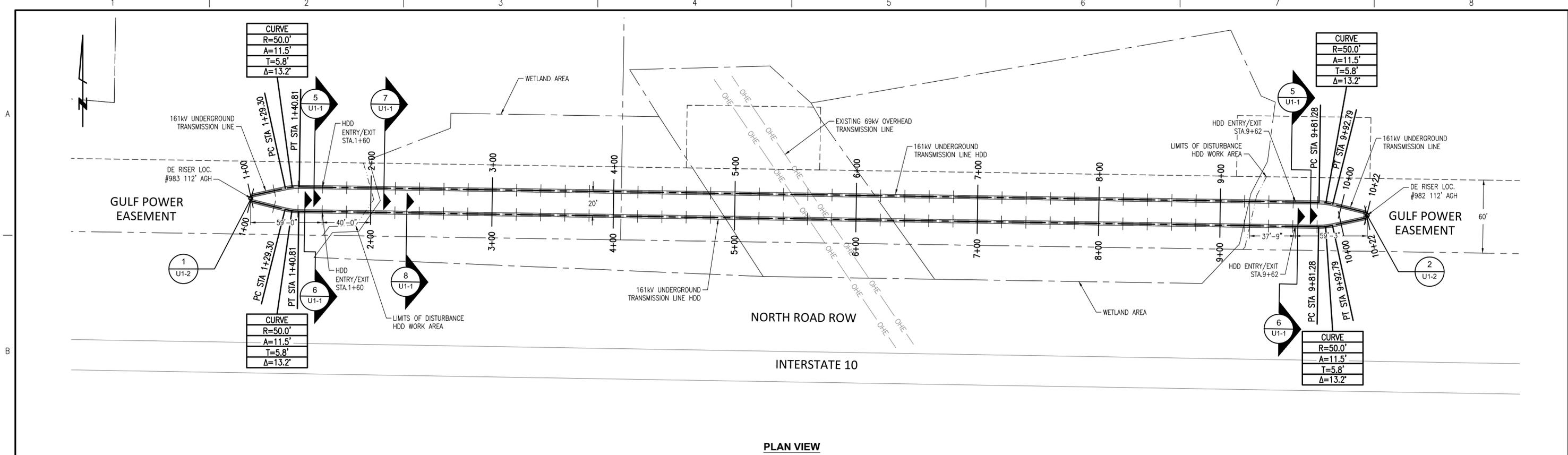
SCALE: 1" = 200'
DRAWN BY: JRT
ENGINEER: JRC
COUNTY: JEFFERSON
SHEET 13 OF 26

DATE: 03/02/21
CHECKED BY: JCF
SECTION: 21-01N-05E
FILE NAME: DukeTransmissionExhibits.dwg
CROSSING: #12

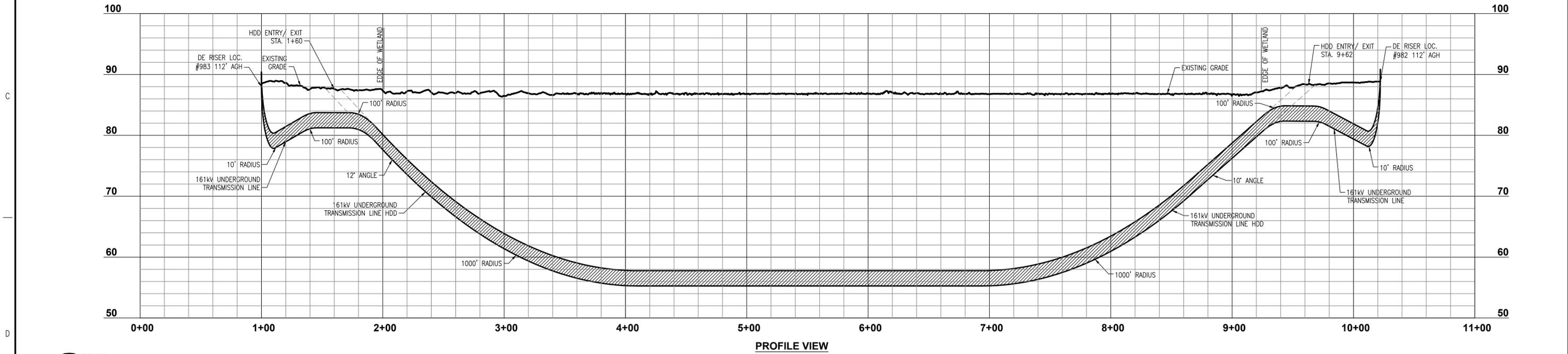
REV	DATE	DESCRIPTION	BY	CHKD	APP
1	03/02/21	ISSUED FOR CONSTRUCTION	GAG	JCF	JRC

NORTH FLORIDA RESILIENCY CONNECTION

TRANSMISSION CROSSING EXHIBIT
FPL 038409
20210013-ET



PLAN VIEW



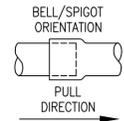
PROFILE VIEW



Know what's below.
Call before you dig.

NOTES:

1. THE UTILITIES AND NATURAL FEATURES SHOWN HEREON ARE BASED ON FIELD SURVEYS, AERIAL PHOTOGRAPHY AND RECORD DOCUMENTS. OTHER FACILITIES MAY EXIST NOT DISCOVERED THROUGH THE RECORD CHECK. THE CONTRACTOR SHALL VERIFY THE EXACT LOCATION, BOTH HORIZONTAL AND VERTICAL, OF ALL UTILITIES THROUGH THE APPROPRIATE UTILITY COMPANIES. CALL BEFORE YOU DIG, 811 OR 1-800-432-4770.
2. VERTICAL LOCATION OF SUBSURFACE UTILITY LINES ARE BASED ON ASSUMED DEPTHS AND MAY VARY FROM THE ACTUAL VERTICAL LOCATIONS.



THIS DRAWING WAS PREPARED BY POWER ENGINEERS, INC. FOR A SPECIFIC PROJECT, TAKING INTO CONSIDERATION THE SPECIFIC AND UNIQUE REQUIREMENTS OF THE PROJECT. REUSE OF THIS DRAWING FOR ANY PURPOSE CONTAINED IN THIS DRAWING FOR ANY PURPOSE IS PROHIBITED UNLESS WRITTEN PERMISSION FROM BOTH POWER AND POWER'S CLIENT IS GRANTED.

REV	REVISIONS	DATE	DRN	DSGN	CKD	APPD	REFERENCE DRAWINGS
1	ISSUED FOR CONSTRUCTION	03/05/2021	JRO	DJ	SCR		
0	ISSUED FOR CONSTRUCTION	01/15/2021	SCR	DJ	SCR		

DSGN	DJ	08/28/20
DRN	JRO	08/28/20
CKD	SR	08/28/20
SCALE:	AS SHOWN	
FOR 22x34 DWG ONLY		

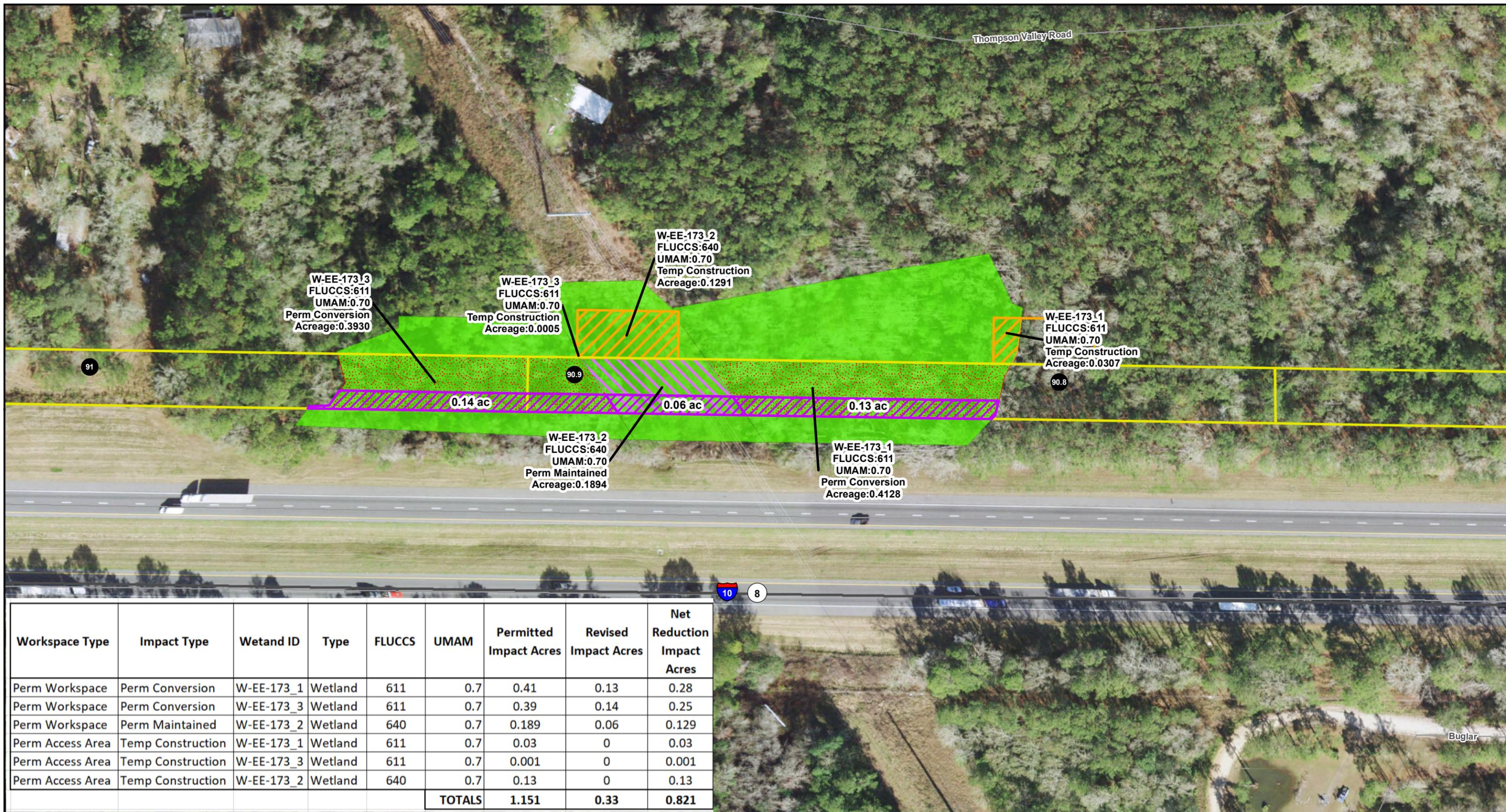


FLORIDA POWER & LIGHT COMPANY
NORTH FLORIDA RESILIENCY CONNECTION
PERRY HDD CROSSING 11
PLAN AND PROFILE

JOB NUMBER	165700	REV	1
DRAWING NUMBER	P1-4		

165700 Plan & Profile REV 0.dwg

Attachment B—Wetland Impacts



- LEGEND**
- Mile Post
 - ▭ Project Boundary
 - ▭ Access Area
 - ▨ Revised Impact Area (0.33 ac)
 - ▨ Perm Conversion
 - ▨ Perm Maintained
 - ▨ Temp Construction
 - ▨ Wetland



ATTACHMENT B
REVISED WETLAND IMPACTS
AT PROPOSED HDD AREA
 COUNTY: Jefferson

SCALE: 1 in = 100 feet FILE NAME: NFRC_WetlandsJDv5_ImpactsHDDd
 DRAWN BY: unash DATE: 4/12/2021 4:46:01 PM

Sources: FDOT, 2018; ECT, 2019, E&E, 2019; Golder, 2019; ESRI, 2018

NORTH FLORIDA RESILIENCY CONNECTION

EPL 038412
 NAD 1983 StatePlane Florida Albers
 20210415
 UTM Zone 18N
 UTM EPS 9003 Feet

Attachment C—Inadvertent Release Plan

Methods for Protection of Water Quality for Directional Bored Wetland and Water Crossings

Florida Power & Light Company (FPL) and contractors will implement the following Best Management Practices (BMP's) to minimize the potential for adverse environmental impacts during Horizontal Directional Drilling (HDD) activities:

- BMP's for erosion control at the drilling and drill rig staging area shall be implemented and maintained at all times during drilling and back-reaming operations to prevent siltation and turbid discharges in excess of State Water Quality Standards pursuant to Rule 62-302, F.A.C. Methods shall include, but are not limited to placement of turbidity screens, staked silt containment fence, hay bales, and/or earthen berms to contain the drilling mud. Erosion and turbidity control measures shall be implemented and maintained throughout construction in accordance with permit requirements.
- FPL's contractor is responsible for knowing and operating within the soil limiting pressure thresholds and utilize BMP's to control drilling fluid pressure during HDD operations.

To provide an additional level of resource protection, the following measures shall be implemented:

- FPL's contractor will identify prior to commencement of construction an environmental scientist/biologist with experience in water quality monitoring and habitat protection to be used in the event of an inadvertent release of drilling fluid.
- At all times, adequate protection will be taken to avoid unpermitted impacts to wetlands and waterbodies, including those with special classification (i.e. aquatic preserves and Outstanding Florida Waters). Upon discovery of a release of drilling fluid into waterbodies or wetlands, the contractor shall cease drilling and back-reaming operations and implement the actions and measures detailed below.
- A vactor truck shall be readily available in the event of an inadvertent release into wetlands or surface waters.
- A spill clean-up kit (i.e., absorbent pads/boom, goggles, gloves, etc.) shall be on-site and available at all times.

Should an inadvertent release of drilling fluid occur, the following measures shall be taken:

- All construction activity contributing to the release shall cease immediately and turbidity containment devices shall be deployed in a manner that minimizes escape of drilling fluid into surrounding areas.
- The inadvertent release will be reported to FPL's designated Construction / Production Lead and Environmental Services. No work shall continue until required notifications are made to all applicable regulatory agencies, including but not limited to the Florida Department of Environmental Protection (FDEP). Work shall resume upon FPL receiving approval from the applicable agencies.
- If there is less return drilling fluid than what was projected to be recovered, drilling crews, including underwater divers (as necessary) shall immediately begin searching for the missing material. If drilling fluid or surface fractures are identified within the waterbody or wetland, then the below Drilling Fluid Containment Plan shall be immediately implemented.

Drilling Fluid Containment Plan:

- In the event of an inadvertent release of drilling fluid into wetlands or surface waters during HDD activities, FPL Environmental Services will report the release to FDEP and other agencies as quickly as practical, but not to exceed 24 hours following detection of the release event.
- The following shall be adhered to upon guidance and authorization from FDEP:
 - Clean-up activities shall commence upon securing any specialized equipment that ensures a safe and thorough clean-up response, and in no instance more than 24 hours after discovering the release.
 - Scientist/biologist will oversee the clean-up activities and ensure suction hoses, if used, are guided to minimize both the removal of natural bottom material and disturbance of any existing vegetation.
 - Released material will be carefully removed to avoid impacts to seagrasses and/or resources.
 - Escaped drilling fluid will be pumped into filter bags located on uplands or directly into a vactor truck or tank.
 - Recovered drilling fluid shall be disposed of at an approved upland location.
 - A barge vendor will be contacted to transport a vactor truck as needed to respond to in-water clean-up.
 - After containment/recovery of the drilling material/resources, a detailed written report shall be submitted to FDEP, within ten business days. The report shall include the location of the inadvertent release, amount of drilling fluid discharged and the amount of drilling fluid recovered, the process in which the drilling fluid was recovered, and a depiction of the area that was affected by the release.

Rev.03.09.2021