Gulf Power®

November 22, 2019

Ms. Kimberly Pearce
Florida Department of Environmental Protection
Northeast District
8800 Bay meadows Way West
Jacksonville, Florida 32256
Transmitted via electronic submittal

RE: Responses to Request for Additional Information (RAI)
Environmental Resource Permit Application 12-0378587-001-EI
North Florida Resiliency Connection Project

Dear Ms. Pearce:

Gulf Power Company (GPC) is pleased to submit the enclosed documents in response to your Department's August 27th, 2019 Request for Additional Information (RAI) regarding GPC's Environmental Resource Permit application for the North Florida Resiliency Connection (NFRC) project.

The responses are provided in question and answer format in the same sequence as was received in the RAI. Several of the written responses reference attachments, which are clearly identified in the table of contents included herein.

As discussed, GPC is incorporating minor changes resulting from engineering and design refinements since the original submittal. These minor changes are depicted in the updated tables and maps included as attachments. These changes result in a net reduction of total wetland impacts to the overall project.

The project team at Gulf Power Company looks forward to continuing to work with the Department during the review process.

Sincerely,

Loretta Cranmer

Loretta Cranmer
Director, Environmental Services

Enclosures

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Response to First Request for Additional Information

Columbia, Suwannee, Madison, Jefferson, Leon, Gadsden, and Jackson Counties – Environmental Resource Permitting Program
Site Name: North Florida Resiliency Connection Project
Site ID: 378587
DEP Application No.: 12-0378587-001-EI

The following is in response to the Request for Additional Information (RAI) requested by the Florida Department of Protection (FDEP) on August 27, 2019 related to Gulf Power Company's (GPC's) Environmental Resource Permit application for the North Florida Resiliency Connection (NFRC) project. The responses are provided in question/answer format in the same sequence as was received the RAI.

Regulatory Review

1. *The UMAM summary tables (Table 10) appear to have been rounded inappropriately when listing impacts. Additionally, the UMAM summary does not appear to address secondary impacts to wetlands adjacent to the impact areas. Please revise the impact tables, UMAM calculations, and project drawings to include secondary impacts to adjacent wetlands and proper rounding of the numbers. In addition, please submit separate UMAM worksheets for each wetland impact/conversion area – specifically one sheet for the impacts to forested wetlands and another sheet for the conversion to herbaceous wetlands. The Department will conduct site inspections to review and confirm wetland boundaries and UMAM scoring. The wetlands located within the project boundary must be flagged for the Department to verify the delineation. Revisions to the calculations and/or mitigation proposal may be required, pending completion of the field work. After final concurrence and approval of the wetland delineation and UMAM scoring, please provide a Letter of Reservation from the geographically appropriate mitigation banks for the appropriate amount and type of Mitigation Bank Credits. [Section 10.3, AH, Vol.I]*

Response:
In the ERP application submittal there is a UMAM summary table (Table 8) and three Functional Loss tables (Table 9) which are separated by the three different types of wetland impacts, including permanent fill, temporary construction, and permanent conversion. The rounding provided as an example was correct, as the wetland identified had zero acres of impact, so the extended functional loss associated with that particular wetland was similarly zero.

Secondary wetland impacts will be avoided through the implementation of Best Management Practices (BMPs) to avoid erosion/sedimentation within areas adjacent to construction.

As requested, representative UMAM worksheets for the conversion of forested to herbaceous wetlands for temporary clearing of forested wetlands are attached. Representative UMAM worksheets are provided for each forested wetland and both impact types as a group rather than for each individual wetland, as the same wetland types are generally similar in functional value throughout the proposed construction area. The specific wetland ID for each area of conversion or temporary clearing is identified on each of the UMAM worksheets.

Please refer to Attachment A for UMAM worksheets organized by wetland and grouped by county. Please see Attachment B for the representative UMAM worksheets which are organized by type of wetland impacts.

Agency site inspections have been in progress since October 29, 2019, and to date, field inspections verifying wetland boundaries have occurred in Jackson, Leon and Suwannee counties, where either real property interest documentation has been acquired or property access permissions from landowners have been obtained. Appropriate mitigation will be determined once the wetland boundaries have been sufficiently reviewed, and if required, mitigation reservation letters will be provided to the Department.

Please note that since the ERP application was submitted in August 2019, minor engineering and design changes have occurred, resulting in minor changes to wetland impacts. The minor changes have been detailed in the updated ERP Table 8 (Wetland and Waterbody Impacts), included as Attachment C. The revised table shows the wetland impacts as submitted in the original application, updated impacts denoted in red, and the delta between the two. The refinements to the project as a result of the engineering and design changes result in a net reduction of overall wetland impacts which span the length of the project.

Additionally, the wetland impact maps included as Figure 5 in the original ERP application have been updated to reflect minor project changes. Please refer to Attachment D for the updated Figure 5 Impacts Maps, which are organized by county and reflect the revised wetland impacts.

Finally, as part of ongoing title searches, GPC has become aware of two conservation easements (CE) in Gadsden County that will require modifications to allow for the transmission line. DEP Permit number 20-0198475-001 is referenced in one of the CEs and DEP permit number 20-0200305-001 is referenced in the other CE.

2. *Page A-5 of the application states, "GPC has obtained or is currently negotiating agreements with landowners for temporary and permanent easements for both construction and maintenance access." Please provide documentation of Real Property Interest in all project areas. If RPI for project construction is not yet acquired, the Department will require permission from property owners prior to starting the field work. [Section 4.2.3(d), AH, Vol.I]*

Response:
As of November 21, 2019, easements have been acquired on 334 of 1,034 parcels. For those properties, where Real Property Interest has not been acquired, GPC is continuing to seek

permission to access properties from landowners so that agency staff can conduct the necessary field inspections. Documentation of Real Property Interest in all project areas will be provided prior to construction.

Agency site inspections have been ongoing since October 29, 2019, and to date, field inspections verifying wetland boundaries have occurred in Jackson, Leon and Suwannee counties where either real property interest documentation has been acquired or property access permissions from landowners have been obtained. Field inspections with agency staff are expected to continue throughout the application review process.

3. The application indicates crossing of several waterbodies and wetlands including some that are Outstanding Florida Waterbodies. Attachment C.7 describes a typical temporary bridge detail, however, the location and use of these bridges are not indicated. Please provide construction details and potential impacts of all wetland and waterbody crossings, including those that are temporary in nature. These details and impacts should include, but are not limited to: navigation, public health/safety, and water quality impacts. [Section 10.2, AH, Vol.I]

Response:
As seen in Attachment C (Updated Impacts Table) and Attachment D (Updated Impacts Maps), the temporary and permanent impacts to wetlands and other surface waters are detailed by location. Additional detailed response is provided in the response to Question 9, below. The specific crossing method will be determined based on site specific conditions as detailed below, none of which are expected to create additional temporary or permanent impacts to wetlands or other surface waters.

Because the type of crossing method used will be somewhat contingent on the site conditions at the time of construction, a Wetland and Waterbody Access Construction Criteria Manual is being developed that will provide guidance to the contractors on specific criteria and conditions under which prescribed crossing methods will be used. Refer to Attachment E for an outline of the Wetland and Waterbody Access Construction Criteria Manual, which will address how navigation will be maintained, public health & safety will be protected, and water quality impacts will be avoided.

Additionally, please refer to Attachment F, which includes the proposed wire stringing crossing method of each navigable river crossing. In general, the wire stringing type is determined by the distance from shore to shore and is not anticipated to create additional wetland impacts to those already identified in the updated impact tables and maps.

a.) It is notice that the project seems to cross surface waters or wetlands without bridge or fill or other ways between Transmission Poles No. 9-10, 14-16, 26-27, 580-601, 744-745, 1118, 1129, 1142, 1809-1810, 1811-1813, 1815-1816, 1818-1819, 1823-1824, 1827-1831, 1888-1889, 1708-1709, 1788-1800, 1803-1804, 1838-1839, and 1864. Please verify and make sure that design covers all project areas. Refer to Part II of Section E of ERP Application and Rule 62- 330.301(1), F.A.C.

Response:
Included as a table with corresponding map exhibits, please see Attachment G, which provides crossing details for each location mentioned above. Additional details as to the best management practices to be implemented for the various wetland and waterbody crossings will be provided in the Wetland and Waterbody Access Construction Criteria Manual that is currently being developed and outlined in Attachment E.

4. Staging area 5 appears to be adjacent to a wetland. Please update the drawings to provide a distance from the wetland to the temporary staging area. [Section 10.2.1, AH Vol.I]

Response:
Staging area 5 has been relocated to a different area on the same property, further away from the adjacent wetland. Updated drawings depicting each of the eight temporary staging areas, that are proposed to be wholly located in uplands. The updated drawing for Staging area 5 shows the distance between the temporary staging area and adjacent wetlands. Please refer to Attachment H.

5. The staging areas all have a circled H. What does this represent? What materials will be used to construct it? [Rule 62-330.020(2), FAC]

Response:
At the time of submittal, helicopter pads on each of the staging areas were contemplated. The circled H depicted the location of the helicopter pads on each staging area. Since the submittal, the use of helicopter pads has been reconsidered and the pads have been omitted from the revised drawings, which are provided as Attachment H.

6. The transmission line route traverses sensitive karst terrain in the areas around the Suwanee River and the Santa Fe River. Please proved information on how this construction and operation of this project is protective of these sensitive areas. [Section 5.9, SRWMD AH, Vol.II]

Response:
Gulf Power Company (GPC) is sensitive to the karst areas encompassed by the project, including those areas around the Suwannee River and Santa Fe River, and is committed to protecting these sensitive areas within the project area through diligence in engineering and construction.

During the engineering phase of the project, GPC is incorporating the following design activities, including field investigations:

- **Desktop review of known karst regions within the project limits**
- **Utilizing environmental assessments and soil investigations to determine the potential existence of the karst terrain in the transmission corridor and take engineering measures to avoid these locations with pole placement.**

- **During field investigations, development of a mitigation plan for voids encountered during subsurface testing that will use data collection methods such as soil borings and Standard Penetration Tests.**
- **Development of a plan to grout each soil boring location, specifically, those locations located in wetlands. Casing will be used, as required, to grout the 4-inch diameter holes in wetlands. Dense clay pellets, which absorb water and swell, will be used to plug each borehole. These clay pellets are environmentally friendly.**
- **Development of construction Standard Operating Procedures (SOPs) addressing assessment, operations and communications.**
- **Engaging a local consultant with expertise in geology, hydrogeology, and geotechnical engineering to oversee geotechnical investigations, including oversight of sub-consultants.**
- **Providing a geotechnical engineer during the sampling/testing process to monitor on-site conditions.**
- **Engineering permanent casing options for use during construction.**

During construction, a bentonite slurry will be used during the foundation installation process. The bentonite slurry effectively seals the augered hole and, used in combination with water and proper drilling technique, keeps the hole open and prevents sloughing of the surrounding soil. In addition, casings may be used to prevent lateral migration of the drilling slurry. The bentonite slurry is also environmentally friendly.

In addition, as part of the construction/operations process, GPC will develop SOPs that will include the following three plans:

- **Assessment Plan**
- **Operations Plan**
- **Communication Plan (Internal and External)**

Specifically, the assessment plan will describe the pertinent steps, and associated personnel necessary, to adequately monitor construction activity as it relates to the karst regions. As previously mentioned, individuals who have expertise in environmentally sensitive areas, such as the karst terrain, will lead a coordinated effort between the engineering and construction disciplines to plan work carefully such that potential risks are adequately mitigated.

The operations plan will establish and document the operations and maintenance activities associated with the transmission line. These items will include activities such as routine patrols (ground and aerial), implementing the mowing and spraying program, and vegetation management. As part of this work, field reconnaissance of the area will be completed with focus on activities such as notable changes to surrounding terrain and identification of operational/maintenance issues and vandalism. Established access points will be consistently utilized to avoid disturbance of additional land area or impact to sensitive features.

A project-specific communication plan will be developed to establish the timely and proper notification of key project personnel. This plan will include a flowchart identifying the sequence of notification and key contact information for individuals involved in the execution of the plan. In addition, secondary contacts will be established should the primary point of

contact be unavailable. Furthermore, this plan will be periodically reviewed and updated to reflect changes in content.

7. Thank you for the Public Interest Test language provided. It appears this project can be deemed "not contrary to the public interest." However, it is unclear on how this project can be deemed "clearly in the public interest." Please provide a statement on how this project can be deemed "clearly in the public interest." [Section 10.2.3, AH, Vol.I]

Response:
In addition to the significant public benefits provided in the Public Interest Statement included in the application, Gulf Power Company (GPC) provides the below following information to demonstrate that the project is clearly in the public interest.

First, reliability will be enhanced for both GPC's and Florida Power & Light's (FPL's) customers. All else equal, having access to more generation resources makes a utility system more reliable. The NFRC line does not currently exist. Consequently, neither GPC nor FPL have the same access to the other system's generating units that the new line will allow. The additional access to additional resources that the new line will provide will enable both systems to have one more path to generation resources than is currently the case. This results in both the GPC and FPL systems becoming more resilient when faced with generating unit outages and/or failures of other transmission lines whether caused by storms or mechanical failure. In addition, the NFRC line will provide other utilities the potential to tie their systems into the new line, thus adding resiliency (and perhaps economic benefits) to their systems as well. (For example, the City of Tallahassee is currently exploring the possibility of tying its system into the NFRC line to benefit the City.)

Second, as discussed in the application, the NFRC project creates more than 200 jobs as part of the development and project construction. From the initial bidding phase for construction, Gulf Power Company encourages contractors to source from the local labor pool. Depending on the skill mixture required for a specific scope/phase of a project, a typical project may access up to 50% of the needed personnel locally. In addition to personnel directly hired by the prime contractor, there are also 2nd tier contractors whose services, by either the size or nature of the service provided, will be sourced from local companies (hay bales for ROW protection, redi-mix concrete for foundations, gravel, trash disposal, rentals, etc.). Finally, due to the scale of the project, service industries indirectly related to construction (hotels, restaurants, etc.) will see a surge in business with a commensurate increase in the number of employees.

Third, the NFRC project will provide significant tax benefits to every county the project crosses. Since the time of filing of the original application, GPC has refined the tax benefits based on more conservative factors. Based on current assumptions, NFRC is projected to provide approximately $73 million in property tax benefits to counties. Those benefits include, by County:

County	Miles	Anticipated tax revenue over next 30 years
Columbia	25	$11 million
Gadsden	33	$14 million
Jackson	3	$1 million
Jefferson	26	$11 million
Leon	26	$11 million
Madison	33	$14 million
Suwannee	25	$11 million

Fourth, lower cost energy will be available to GPC's customers from FPL's generating fleet. GPC's current generation units (power plants) are less fuel-efficient than FPL's generation units. GPC's generating units use almost 40% more fuel to produce a kWh of electricity than FPL's units use. Because the NFRC line provides access to FPL's significantly lower cost generating units around the clock, 365 days a year, GPC's customers will benefit from lower energy costs that are made possible by the NFRC line. Additionally, GPC will incur significantly less cost in obtaining the energy if a new transmission line is built rather than paying annual fees to obtain the energy over existing transmission lines. Over the projected 47-year life of the NFRC line, the NFRC is projected to result in a savings ranging from $148 to $296 million over obtaining the energy through existing transmission.

Fifth, lower costs for new generation units will be possible for GPC's customers. For future maintenance of electric reliability, GPC will need to either build new generating units in its service territory, or rely on the NFRC line and access to FPL's system of generating units. GPC forecasts have shown that utilizing the NFRC line will result in GPC having to construct less new generation capacity. For example, GPC forecasts indicate that in the year 2023, the NFRC line would result in GPC needing to have 250 megawatts (MW) less of system generating capacity. This is projected to save GPC customers $175 million in just the capital cost of building a new generating unit alone. In addition to this capital cost savings, there would be additional cost savings from not having to pay annually for fuel, operations, maintenance, etc. for a new unit. In addition to cost savings, having to build and operate less new generation will likely result in lower air emissions in GPC's service area.

Sixth, solar facilities built in GPC's area will not only serve GPC's customers, but can serve FPL's customers as well. Part of GPC's generation planning is to make significant improvements to its fleet of generating units. Part of that effort will be to install new solar photovoltaic (PV) facilities. These new solar facilities will deliver energy to GPC's customers and will do so with no fossil fuel usage and zero emissions. Initial projections show that it may be possible to build approximately 2,000 MW of new solar in GPC's area that are cost-effective by the year 2030. Such an assumption would mean that the total solar megawatt-hours (MWh) output in the afternoon on many spring and fall days is projected to be greater than the entire GPC area electrical load for at least several hours. The existence of the NFRC line will allow this "excess" solar MWh output to be transmitted back over the line for the

benefit of FPL's customers instead of the excess solar MWh being curtailed. During these hours, the ability to import zero emission MWh from GPC's area into FPL's service territory will also result in lower air emissions in FPL's territory.

Finally, regarding any public safety concerns related Electric and Magnetic Fields (EMF), the Siting Office of your Department has established standards for EMF from transmission lines. The Applicant will comply with all State rules and regulations, including any reporting requirements as it pertains to EMF and the proposed project.

The above benefits show a clear public benefit under the first criterion of the public interest test related to public health, welfare, and safety. The other six criteria are at least neutral. All seven criteria taken together, with the additional information above, shows this project is clearly in the public interest.

Stormwater Review

8. *The application describes eight temporary work areas to be used during construction for staging of materials and contractor trailers. The staging areas show a crushed limerock perimeter road and an interior made of crushed rock over geotextile fabric. These materials are considered semi-impervious or impervious. Additionally, the application describes the construction of a fiber-optic repeater station in Jefferson County. Stormwater treatment and attenuation may be required if project includes new impervious and semi-impervious surfaces of more than 4,000 sq ft subject to vehicular traffic or more than 9,000 sq ft new impervious and semi-impervious surfaces. It appears the permitting thresholds requiring stormwater treatment will be exceeded. Typical Staging Area shows a Cross Section A-A, which is a design for perimeter roads around the staging area. Please extend the cross section to show entire staging area. Additional information and project modifications related to surface water runoff and treatment may be required, pending review of additional project details. [Rule 62-330.020(2), FAC]*

Response:

The combination of the eight (8) temporary staging areas and the permanent repeater station will exceed the 9,000 sq. ft. threshold. As such, GPC will provide stormwater treatment for runoff and attenuation for each.

GPC reviewed each staging area and has provided for the first 1" of runoff through storage in the voids between the #57 limerock that will be utilized at each staging area. GPC has performed extensive testing on the void ratio of #57 limerock and has determined a void ratio of 40% to be a conservative value. Based on the area of the staging areas (12 – 16 acres) utilizing the voids for storage is adequate. However, to ensure that the staging areas cause no harm to the neighboring properties and to provide an additional safety factor for unknowns, GPC will install a swale/berm system around the low side(s) of each staging area to provide 1 foot of freeboard. GPC will also install dry retention ponds sized for attenuation.

Typical cross-section drawings have been included to show the staging areas in their entirety. Please see detail on page 5 of Attachment H.

Stormwater design and calculations for five of the eight temporary staging areas are included in Attachment H. General layout drawings of the remaining three temporary staging areas are provided at this time for reference. Landowner negotiations are on-going regarding these three temporary staging areas, and once the final locations are determined, site specific stormwater design and calculations will be submitted.

The location of the proposed repeater station has changed to a location in Madison County. The repeater station will be evaluated similarly to the temporary staging areas. However, the true impervious area of the repeater station is less than the 9,000 sq. ft. threshold, therefore, it's been determined that the #57 limerock combined with a berm / swale system is adequate without the need for additional dry retention. Since the initial application, it's been determined that there will be monthly trips to the repeater station. Therefore, in order to support the monthly traffic to access the 2,400 sq.ft. repeater station site, a 2,269 sq. ft. at-grade (#57 limerock) access drive and apron is proposed, which is less that the 4,000 sq.ft. threshold. See Attachment I for details pertaining to the proposed repeater station and access drive. Stormwater design and calculations for the repeater station will be submitted after collection of the necessary field data (e.g. soil borings and percolation tests) is completed.

9. *Please provide a typical cross section for all situations of fill (upland, wetland or surface water, for any purpose, at any onsite or offsite location, with matting or other materials). If one cross section cannot fit all situations, please provide one for each situation. Please note that culvert design shall be provided and supported by calculation if fill will be above grade. Since mats can be as high as 24 inches, they may not be used in all situations. Please address and specify in the design drawings how to avoid blockage of flow when a mat is used. In no time the project shall cause any flooding condition. Refer to Part II of Section E of ERP Application and Rule 62-330.301(1), F.A.C.*

Response:
Please see the response to question 8 above which describes the situations where fill will be placed in uplands.

Other than certain transmission line structures and guy anchors, there will be no other permanent fill placed in wetlands. Temporary matting will be utilized throughout the project as a best management practice when working in wetlands. GPC recognizes the need to ensure that blockage of flow is prevented. The project traverses several different types of terrain where matting will be used. GPC will ensure that existing flow will not be impeded or blocked during the use of matting. Typical drawings showing the use of matting are provided in Attachment J.

In addition, GPC will include requirements in its construction documentation package that address each scenario where matting will be used during clearing and transmission line construction. A final Wetland and Waterbody Access Construction Criteria Manual (outlined in Attachment E) will be submitted to the Department for review and made part of the construction contract documents for contractors and sub-contractors to adhere to. Additionally, GPC will provide on-site supervision during the construction process to ensure

that the contractors abide to the specifications and requirements of the Wetland and Waterbody Access Construction Criteria Manual.

Proprietary Review

10. Any crossings on State Owned Uplands will require authorization/permission from the State of Florida for proposed work on State Owned Uplands. Any crossings on Water Management District Property will require authorization/permission from the appropriate Water Management District. In addition, any crossings in areas currently under easement by FDOT will require authorization/permission from FDOT. [Rules 18-21.004(3)b. and 18-2.018, F.A.C.]

Response:
On June 28, 2019, Gulf Power Company submitted its Application for the Use of State Owned Uplands. Additionally, the appropriate authorizations are being sought for areas where the project affects lands owned or managed by the Water Management District. Similarly, appropriate authorizations from Florida Department of Transportation (FDOT) will be obtained prior to conducting activities that require FDOT approval.

11. Sufficient Upland Interest in the riparian parcels adjacent to the Sovereign Submerged Land Easements is required to be submitted to the Department prior to execution of the Easement. [18- 21.009(1)(c), FAC]

Response:
Gulf Power Company is in the process of acquiring easements within the riparian parcels adjacent to the thirteen crossings of the identified twelve Sovereignty Submerged Lands (SSL). Documentation that demonstrates sufficient upland interest will be provided to the Department prior to the execution of the SSL easements.

12. Thank you for submitting the easement sketches for the Sovereignty Submerged Lands crossings. These easements are currently under review to ensure they meet Department requirements. Additional requests for corrections may be asked once the reviews of the easement sketches are finalized. [Rule 18-21.009(1)(e), F.A.C.]

Response:
Noted. Gulf Power Company looks forward to your completed review.

13. Thank you for submitting the Proprietary Noticing recipients as required by subsection 18-21.005(3), F.A.C. It appears the Department is missing the noticing labels for the Jefferson County crossings. Please provide. The Department will request additional noticing information once the easement sketches are approved by the Department.

Response:
The noticing labels for the Jefferson County crossings were inadvertently omitted from the original submittal when the final document was being compiled. Enclosed as Attachment K, please find the labels for those additional six property owners.

14. Please submit the easement processing fee of $669.00. [18-21.009(1)(g), FAC]

Response:
Since this was an electronic submittal, the easement processing fee of $669.00 (check #0103478) will be sent via mail to the Northeast District Office.

NOT A COMPLETENESS ITEM: *Dewatering may require authorization from the Department's Wastewater Section. Please contact Robert Martin, P.G. at Robert.L.Martin@floridadep.gov or at 904-256-1613.*

Response:
As required, dewatering permits will be obtained prior to construction from the appropriate agencies.