

## NFRC ERP Application Attachment J—Public Interest Test

*1. Please describe how the proposed activity will not be contrary to the public interest, OR if such an activity significantly degrades or is located within an Outstanding Florida Water (OFW), that the regulated activity will be clearly in the public interest (Refer to AH I Section 10.2.3).*

The North Florida Resiliency Connection (NFRC) project is part of Gulf Power Company's (GPC's) ongoing investment to enhance electric service reliability and resiliency. Project benefits include the following:

- Builds on GPC's overall strategy to improve reliability
- Leverages both the GPC and Florida Power & Light Company (FPL) systems to create annual savings for GPC customers
- Uses concrete transmission poles that have the benefit of strength, have a longer life of 50+ years, require minimal maintenance, and are fire- and corrosion-resistant
- Is resilient to power outages from major storms and hurricanes by storm-hardening the energy grid
- Creates more than 200 jobs as part of the development and project construction
- Generates more than approximately \$100 million in property tax revenue over the next 30 years

*a. Please describe how the project will be designed to avoid adverse effects to public health, safety, or the welfare or the property of others.*

The project will be constructed, operated, and maintained in accordance with the National Electrical Safety Code (NESC), 2017 Edition. The NESC is an American National Standards Institute standard that covers electrical clearances and loading and strength requirements, including extreme wind.

Codes and standards of other agencies and standard organizations that provide rules, guidelines, and conditions for particulars not specified by NESC but used to design and construct proposed transmission lines include the following:

- Occupational Safety and Health Administration (OSHA) rules, which provide requirements for safe minimum approach distances during construction

- American Society of Civil Engineers Manual of Practice No. 74, Guidelines for Electrical Transmission Line Structural Loading, 2009, and Standard No. 048 11, Design of Steel Transmission Pole Structures, if using steel structures
- Federal Aviation Administration guidelines (Title 14, Part 77, Code of Federal Regulation [CFR]), which cover requirements in the vicinity of airports, if applicable
- Florida Department of Environmental Protection (FDEP) standard for EMF from transmission lines and substations [Specific Authority 403.061(7), 403.523(1) FS. Law Implemented 403.061(30), 403.523(14) FS. History – New 3-21-89, Amended 1-7-93, Formerly 17-274.450, 17-814.450, Amended 6-1-08]
- Florida Department of Transportation (FDOT) 2017 Utility Accommodation Manual

These codes, guidelines, and standards provide design parameters with the goal of protecting public safety.

*b. Please describe how the project will be designed to avoid adverse effects to the conservation of fish and wildlife, including endangered or threatened species, or their habitats.*

During field surveys of the right-of-way, observances of all federally and state-listed species and their habitats as well as other sensitive areas were noted. Additionally, existing agency records were reviewed for other known and historical occurrences. This information was shared with the project team during the route development process to consider avoidance of these features. Listed species are to be addressed in conditions to this permit application. GPC has proposed performing preclearing listed species surveys according to agency survey protocols in the time of year most likely to observe such species' presence. These survey data results will be shared with regulatory agencies to provide for avoidance or mitigation to any listed species potentially affected by the project.

Due to the overhead nature of the project, impacts will largely be associated with construction and installation of the transmission structures and will be temporary in nature. Best management practices (BMPs) and coordination with regulatory agencies will be practiced to confirm appropriate measures are taken to avoid adverse effects to wildlife and habitat.

*c. Please describe how the project will be designed to avoid adverse effects to navigation or the flow of water or cause harmful erosion or shoaling.*

Construction impacts will be minimized by use of appropriate BMPs. Attachment C contains the BMP exhibit. Once construction has been completed and the transmission structures have been installed, preexisting elevations and topography will be restored to preconstruction conditions. No in-water work is proposed in navigable waters. For navigable waterways, such as the Apalachicola and Suwannee rivers, GPC will employ construction techniques and BMPs, such that impediments to navigation will not occur.

*d. Please describe how the project will be designed to avoid adverse effects to the fishing or recreational values or marine productivity in the vicinity of the activity.*

The project crosses no marine or estuarine environments, so fisheries and recreation associated with those habitats will not be impacted.

The project will be constructed across several freshwater habitats or near rivers, lakes, and creeks, but fishing or recreational activities near these resources would experience only minor and temporary disturbances from the presence of machinery and construction workers. Construction of the project is expected to take approximately 6 months, so localized disturbances will be limited in duration. Special construction techniques and BMPs will be used at water body crossings to minimize adverse effects on fishing or other recreational activities.

*e. Will the project be of a temporary or permanent nature?*

The clearing for the project will be of a temporary nature within the construction right-of-way. Once the transmission line is installed, a 15- to 60-ft-wide permanent right-of-way will remain based on site-specific conditions. A portion of that permanent right-of-way will be maintained free of certain man-made structures and free of deep-rooted woody vegetation. Part of the commitment to safe, reliable electric service includes a preventative maintenance program that annually clears tree limbs and branches. The transmission line easement will be inspected routinely for trees or limbs that might interfere with powerlines and cause outages.

*f. Please describe how the project will be designed to avoid adverse impacts to significant historical and archaeological resources, under the provisions of section 267.061, F.S.*

GPC has hired several cultural resources firms that have coordinated an extensive search of available records and field surveys of the entire right-of-way. The resulting report will be shared with the federal and state historic resources agencies when data collection is completed and the report has been finalized. The cultural resources firms will coordinate closely with the State Historic Preservation Office to confirm all known or newly discovered sites are preserved intact or recovered.

*g. Please describe how the project will be designed to avoid adverse effects to the current condition and relative value of functions being performed by areas affected by the proposed regulated activity.*

For the most part, existing land uses and low-growing vegetation on the right-of-way will not change after construction is completed. Property owners whose property is crossed by a proposed easement will be compensated for the use of their land and for any damages to their land due to construction or operation of the project. Those owners will, in most cases, be able to continue use of that right-of-way following installation. Wetlands functions will not be lost; however, the wetland type may be altered, but appropriate mitigation will be provided. No roadways or navigable waterways will be permanently affected by placement of transmission lines.