Gulf Power®

5 November 2019

Jason Aldridge
Compliance and Review Supervisor
Florida Division of Historical Resources
R. A. Gray Building
500 South Bronough Street, Room 423
Tallahassee, FL 32399-0250

RE: Cultural Resources Assessment Survey for the Gulf Power North Florida Resiliency Connection Transmission Line Project in Columbia, Suwannee, Madison, Jefferson, Leon, Gadsden and Jackson Counties, Florida (FDHR Project File # 2019-4593)

Dear Mr. Aldridge:

Enclosed please find copies of the final reports and supporting documentation for the three (3) cultural resources assessment surveys preformed for the Gulf Power Company (Gulf Power) North Florida Resiliency Connection (NFRC) Transmission Line Project in Columbia, Suwannee, Madison, Jefferson, Leon, Gadsden and Jackson Counties, Florida. This information is being provided in support of a Florida Department of Environmental Protection, South District request concerning application number 12-0378587-001-EI and US Army Corps of Engineers (USACE) permit application number SAJ-2019-02766. This effort was divided into three phases or segments, with each project phase or segment evaluated by a different cultural resource management firm. Phase I was conducted by SouthArc, Inc.; Phase II was performed by SEARCH, Inc. The final Phase III segment was evaluated by Janus Research.

These studies were designed to comply with Section 106 of the *National Historic Preservation Act* (NHPA) of 1966 (Public Law 89-665, as amended), as implemented by 36 CFR 800 - *Protection of Historic Properties* (incorporating amendments effective August 5, 2004); the revised Chapter 267, Florida Statutes; Rule 1A-46 of the Florida Administrative Code; and the recommendations set forth in Module 3 of the Florida Division of Historical Resources Cultural Resource Management Standards and Operational Manual (February 2003). The purpose of these investigations was to identify any potential historic properties (e.g., archaeological sites, historic structures, and historic features) within the Area of Potential Effects (APE) defined for this project and assess their eligibility for listing in the National Register of Historic Places.

The NFRC project will increase the capacity of the existing transmission network in the Gulf Power Sinai Cemetery area and the Florida Power and Light Company (FPL) Raven area in a reliable manner consistent with North American Electric Reliability Corporation (NERC) and other applicable transmission system standards. The transmission connection between the Gulf Power and FPL transmission networks will improve resource and transfer capabilities while providing flexibility for power flows between the two systems and both existing and future substations, resulting in greater resiliency.

The NFRC project will be constructed using monopole, self-supporting structures (poles), with some exceptions where locations require heavy turn angles and the poles require guy wires. The aerial overhead transmission lines will have three phases and an optical wire/overhead ground wire, which can also be used for communications. Permanent patrol roads will not be constructed. However, vegetation clearing and the

use of temporary construction mats will be required throughout the project area in order to construct the project safely. Typical land requirements for the permanent easements necessary to construct and operate the transmission line will be either 15-ft. wide easements when adjacent to non-limited access road rights-of-way (ROWs) or 60-ft. wide easements otherwise. Approximately 2,000 poles will be installed for this project, typically varying in height from 75 to 110 ft. above ground elevation. Poles will either be spun concrete or steel and will be approximately 3 to 4 ft. in diameter. Pole foundations will be either direct embedded or augered cast-in-place concrete. Pole spacing will typically vary from 400 to 600 ft., depending on physical features and site conditions along the ROW.

Coordination with your office (FDHR Compliance and Review Section) began early in the NFRC project planning process. Given the length of the Project corridor, a research plan was developed for each of the three project phases. These plans were reviewed internally by Gulf Power before they were submitted to the FDHR. On March 22, 2019 representatives of Gulf Power held a conference call with you and Lindsay Rothrock to discuss the overall project approach and to provide the Phase-specific research plans. In a letter to the Florida Department of Environmental Protection dated August 23, 2019, Kristen Hall with FDHR acknowledged this early coordination.

With this submittal, I am respectfully requesting your review of, and comments on and/or concurrence with, the results, conclusions, and recommendations presented in the final reports and supporting documentation for the three (3) cultural resources assessment surveys. Please note that due to access concerns and safety issues related to downed trees from Hurricane Michael, not all of the easements through which the project passes could be fully evaluated during these investigations. Therefore, additional studies necessary to complete these investigations will be required. A Programmatic Agreement (PA) outlining the steps to be taken to complete the identification of historic properties, evaluate the effects of the project on historic properties, and resolve any adverse effects on historic properties will be developed and executed in coordination with your office and the USACE Jacksonville District in order to complete the Section 106 compliance process.

Yours Sincerely,

Richard W. Estabrook

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Gulf Power Company/Florida Power & Light Company

Cc: Benny Luedike, Environmental Manager, FPL
Robin Moore, Archaeologist, USACE Jacksonville District