



25 January 2021

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: Addendum Cultural Resources Assessment Survey Reports 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:

Attached via electronic mail are copies of the addendum reports and supporting documentation for the three (3) cultural resource assessment surveys performed for the Gulf Power Company (Gulf Power) North Florida Resiliency Connection (NFR) 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, request concerning application number 12-0378587-001-EI and US Army Corps of Engineers (USACE) permit application number SAJ-2019-02708. 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 segment was conducted by Commonwealth Heritage Group, Inc. (formerly SouthArc, Inc.); Phase II segment 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. This effort is now being governed by the *Programmatic Agreement Among the US Army Corps of Engineers, the Florida State Historic Preservation Officer, the Poarch Band of Creek Indians and Gulf Power Company Regarding the Gulf Power Company North Florida Resiliency Connection Transmission Line in Columbia, Suwannee, Madison, Jefferson, Leon, Gadsden and Jackson Counties, Florida*.

These reports detail the approximately seven (7) percent of the corridor that was inaccessible for testing during the initial assessment surveys. These assessments also include four (4) additional Staging Areas that will be used to store materials and equipment. A fifth Staging Area (Area 8) was included in Janus's original assessment survey report for the Phase III segment of the corridor. These reports also include some additional survey and testing that was recommended by your office for lands within the Lake Talquin State Forest and the Wakulla State Forest. The Commonwealth report also includes additional site boundary testing

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that was recommended by Larry Haikey, the Tribal Historic Preservation Officer (THPO) for the Poarch Band of Creek Indians. This additional testing at several sites that had been previously evaluated better defined the site boundaries but did not change the NRHP eligibility recommendations for these resources.

With this submittal, I am respectfully requesting your review of, and comments on and/or concurrence with, the results, conclusions, and recommendations presented in these addendum reports and supporting documentation for the three (3) addendum cultural resource assessment surveys. Per Section I(a) of the *Programmatic Agreement*, the Consulting Parties have agreed to a thirty (30) calendar day review for all documents and deliverables.

Yours Sincerely,

A handwritten signature in blue ink that reads "Richard W. Estabrook". The signature is written in a cursive style with a large initial 'R'.

Richard W. Estabrook, Ph.D. RPA
Environmental Services Senior Project Manager - Archaeologist
Florida Power & Light Company/Gulf Power Company

Cc: Robin Moore, Archaeologist, USACE Jacksonville District
Larry Haikey, Tribal Historic Preservation Officer (THPO), Poarch Band of Creek Indians
Benny Luedike, Environmental Manager, FPL
Franck Leblanc, Director, FPL Environmental Services, Power Delivery