



April 21, 2017

Ms. Cindy Mulkey, Program Administrator
Office of Siting Coordination
Florida Department of Environmental Protection
2600 Blairstone Road, MS 5500
Tallahassee, FL 32399-2400

RE: Florida Power & Light Company
FPL Levee-Midway 500kV Transmission Line
Transmission Line Siting Act Certification No. TA89-0
Post-Certification Submittal – RAI Response

Dear Ms. Mulkey,

Florida Power & Light Company (FPL) is pleased to submit the attached response to the Florida Department of Environmental Protection's (FDEP) request for additional information for Levee-Midway Transmission Line Corridor (TA89-07), dated April 5, 2017. The questions in the RAI are listed in *italics* and FPL's responses are provided in **bold**:

A. South Florida Water Management District (SFWMD)

1. *Attachments B, C, D and E were identified as "to be provided". Please submit those items.*

Attachments B, C, and D are attached for reference. Please note that the Attachment B has been updated from the previous version submitted the FDEP on March 22, 2017.

Attachment E was intended to address how the project will affect the SFWMD's Communication System(s), which will not occur as a result of this project. No direct or indirect impacts from FPL's proposed transmission lines to the SFWMD radio network are anticipated. Radio and television communications are within the jurisdiction of the Federal Communications Commission (FCC), and FPL has provided assurance it will work with any entity experiencing radio and television interference as a result of the proposed transmission lines to resolve the interference issue.

With respect to SFWMD's radio network and microwave relay stations, FPL acknowledges that these are critical public safety facilities and should not be interrupted. No interference issues are anticipated. However, in the unlikely event that interference is attributable to FPL's line, FPL will correct all interference issues with SFWMD's system that are caused by the addition of FPL's proposed transmission line.

2. *The Segment 3.1 submittal in 2015 did not include installing the actual lines. Will that be submitted separately?*

Please accept the enclosed materials to supplement FPL's Post Certification Submittal for Phase 3.1. Attachment A2 includes plan views of corner pads 476, 497 and 501, which are within Phase 3.1 and depict distances from the nearest pole and anchor centerlines to the toe

of the adjacent levee. Also included is Phase 3.1 - Figure 3, which shows the distances from the centerline of nearest pole to the toe of the adjacent levee.

3. *Table A1 for both Phase 3.2 and 3.3 states the configuration of the access roads and pads have been revised. It is also indicated that FPL will apply for a modification of the original ROW Permit 9713 to capture the revisions and details of temporary access to construct.*

- a. *Will FPL be submitting the permit modification to cover both phases at the same time or each phase separately? Will each phase be constructed separately? What is the anticipated timetable for construction?*

FPL submitted an application package to modify SFWMD ROW Permit 9713 for Phases 3.2 and 3.3 on April 7, 2017. The submittal includes revisions to roads and pads and details of temporary access for construction of the project along with construction timeframes.

- b. *The application fee for modification of Permit 9713 for each phase submitted will be \$300.*

The application fee of \$300.00 was submitted with the SFWMD application package on April 7, 2017

- c. *Details for temporary access to construct including vehicles (maximum loads) and equipment used, ingress-egress points of for access routes (including distances), duration of use and estimated number of daily trips will need to be provided as part of the application. (Please see attached criteria for temporary access use of District rights of way.)*

Temporary access details were included in the SFWMD application package submitted on April 7, 2017.

- d. *There are three (3) laydown areas proposed along the north side of C-9. These appear to be the same as previously authorized under the previous modification of Permit 9713 for Phase 3.1 issued Aug. 26, 2016. Are any other laydown areas proposed within District ROWs?*

FPL is proposing an additional five (5) laydown areas for the projects, i.e., three along Pines Blvd on the east side of the Levee L-33, and two on the south side of the L-30 Canal. Please see Attachment A3d - Figure 9 for details.

4. *For Phase 3.2, one of the structure pads (#502) is within the western side of Everglades Holiday Park (EHP) and appears to overlap a service road. Broward County Parks & Recreation has applications in house for District permits (ERP and ROW) for improvements to EHP. It is recommended that FPL contact the county (Martin Gross, Construction and Engineering – Parks Planning and Design section, 954-577-4646) to determine if there are potential conflicts that need to be resolved.*

FPL has initiated contact with Mr. Martin Gross (Broward County Construction and Engineering-Parks Planning and Design) to discuss coordination of the proposed FPL and EHP projects. Attachment A4 includes Figure 3 - RAI (EHP), which shows the FPL Right-of-Way and Structure 502 in relation to the referenced existing access road, with an overlay of the proposed EHP Park improvements.

To alleviate construction activities within the park, FPL is proposing to replace the originally proposed east/west access road, south of the park entrance (levee L-33 to pad 503), with an

access road east of Pines Blvd. This will reduce construction and future maintenance traffic through EHP to only FPL Structure 502 and the attached conductors for adjacent spans. The remainder of construction activities will be completed using the proposed Pines Blvd. Access Road. Additional wetland impacts are not proposed.

FPL intends to closely coordinate with EHP to minimize impacts to their operation from construction. Over the entire construction period for the transmission lines, construction crews and equipment will be present at each work location (e.g. Structure 502) at irregular intervals for short durations. These durations will vary for each phase of construction but will usually be only a few days.

After construction, FPL operations and maintenance traffic is expected to be minimal. This typically includes regular inspection of the poles, conductors, insulators, hardware, access areas, and vegetation in proximity to the facilities. The inspections will primarily consist of ground patrols (truck) but may also include aerial (helicopter/airplane) patrols. Electric transmission lines normally require minimal maintenance; however, FPL will inspect the transmission lines on a regular basis to look for problems caused by weather, vandalism, vegetation regrowth, etc.

5. *Since this work will impact federal levees, Section 408 authorization will be required. District staff will request the approval from the USACE on behalf of FPL. Detailed drawings will need to show existing and design levee cross sections and elevations at the work locations. Specify the datum on drawings with elevations. Earthwork specifications and construction details are needed for the placement of fill over the levee slopes. Pole locations are not defined for all locations. If these are to be added later, they will need to meet USACE levee setback requirements. Poles and foundations should be kept a minimum of 15 feet from the levee toe, or farther for burial depths greater than 15 feet.*

Pole and Anchor distances are shown in plan-view in Attachments A2 and A5. Cross sections at corner pads and levee roads and pads adjacent to levees are presented in Attachment A5.

Fill material for road and pad construction will be clean fill and base material, with sub-base fill compacted to 95% of the American Association of State Highway and Transportation Officials (AASHTO) Test T-180, and base course fill compacted to 98% of the AASHTO Test T-180. Base course shall have a Limerock Bearing Ratio (LBR) 100 value.

Poles and anchors for the structures in proximity to federal levees will meet U.S. Army Corps of Engineers (USACE) levee setback requirements of a minimum of 15 ft. for each transmission line structure.

- a. *Broward County segment: The corridor is outside the L-33 levee limits, except for the access road near the north end. Since it appears that some improvements are proposed on the levee crown and landside slope at that location, details of this work are needed (plan and profile views showing any fill or other improvements to be placed, material specifications, etc.). Please provide a cross section through the levee and access road shown on Figure 4A, perpendicular to A-A at the new road center line.*

The proposed access road from the levee L-33 to pad 503 has been eliminated. The proposed access point to pads 503-531 has been revised to Pines Blvd. FPL proposes to extend Pines Blvd. to the west to the proposed FPL north/south access road. The plan and profile view of the Pines Blvd extension over the L-33 Levee is presented in Attachment A5a.

- b. *Miami-Dade segment - The portion of the work along the L-30 levee (1.3 miles +/-) will require Section 408 authorization similar to the segment along L-68A that was approved last year. Pole placement must meet USACE levee requirements location 541 looks like it may not, and Figure F-2 appears to show anchors located too close to the levee toe (less than 15 feet). See the previous Section 408 package provided for Segment 3.1 for guidance. The levee design information that will need to be shown on the drawings for both L-33 and L-30 can be obtained by contacting Teri Swartz, at (561) 682-2505 or tswarz@sfwmd.gov.*

The pole and anchor locations for structures 536 and 541 have been revised to provide a minimum distance of 30 ft. to the levee toe from the centerline of poles and anchors. The details of pad configurations relative to the levee locations are provided in Attachment A5. Pad 541 has been revised to include a ramp that is proposed from the levee road to the pad to enhance access to the project.

B. Miami-Dade County Division of Environmental Resources Management

1. *Chapter 24 of the Code of Miami-Dade County requires that all fill material placed in wetlands shall be clean fill. The fill material shall not contain solid, chemical or hazardous waste and shall be free of exotic and nuisance plant seeds. Conformance to these requirements meets the applicant's local government regulatory obligation included in the Conditions of Certification.*

All fill material proposed to be placed within the certified transmission line ROW shall meet the clean fill/soil criteria, pursuant to the definition of Chapter 24-5 of the Code of Miami-Dade County. FPL requires that incoming material shall be tested according to local, state and federal requirements/regulations. Constituents of concern include PAH, PCB, TRPH, Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, and Silver. FPL requires that total concentrations of the constituents shall be below the Soil Cleanup Target Levels (SCTL) as per FDEP Chapter 62-777 and the more stringent of either Residential (direct exposure) or Leachability standard would apply. Due to the large volume of incoming material for said project, FPL plans to take monthly samples from the selected quarry for the duration of the project.

2. *The Permittee shall notify and submit to Miami-Dade County all semiannual narrative reports submitted to the agencies referenced in the Conditions of Certification for the certified corridor from the Miami-Dade/Broward Line to Levee Substation.*

FPL will provide semi-annual reports documenting construction activities completed during the period within Miami-Dade County (MDC). Reports will be provided to MDC designated staff in January and June of each year during construction.

3. *The certified corridor from the Dade/Broward Line to Levee Substation will cross canal reservations, canal rights-of-way or other proprietary areas of Miami-Dade County. Additional information regarding the placement of all structure pads, access/maintenance roads, culverts, fill materials or other related activities that may occur within canal reservations, canal rights-of-way or other proprietary areas of Miami-Dade County is required. In addition, the Permittee shall submit to Miami-Dade County, prior to the commencement of construction of any portion of the transmission line, a complete list of construction activities that may obstruct, divert, control, impound, or cross canal reservations, canal rights-of-way or other proprietary areas of Miami-Dade County.*

The locations of MDC canal reservations, easements, and proprietary areas relative to the 200 ft. wide FPL transmission line right-of-way (ROW) are shown in Attachment A5. The ROW was selected based on input from agencies, Conditions of Certification, and the Stipulation between FPL and MDC in Appendix F of the Conditions of Certification. Exhibit C, Item 5 of the stipulation limited ROW position to the east side of the Miami-Broward levee except at Thompson Park resulting in a westerly location as stated in the following excerpt from the stipulation:

“Item 5. From the Levee Substation north to the southern boundary of Thompson Park, except for the portion of the corridor which goes in an east-west direction, the corridor shall be limited to 400 feet immediately east of the east bank of the Dade-Broward Levee, which is the levee to the west of the Dade-Broward Levee Canal.”

Details regarding fill and structure locations, construction details, and crossings by overhead power lines for the Wellfield Protection Canal and the Pennsucco Canal were previously provided in the TLSA Post Certification Submittal. At each crossing the low point of the

overhead lines will be maintained a minimum of 40 ft. above the highest prevailing ground surface within the crossing area.

FPL determined that utilizing the existing Well Protection Canal berm would minimize the potential impacts for listed species and wetlands while providing economical construction costs and reliability of service. FPL has utilized existing linear facilities, such as existing berms, in the past to minimize impacts to the environment. Requested access points, i.e. at 122nd Avenue and at the Pennsuco Canal, in addition to those included in the ROW Occupancy Permit 9713 permit are depicted graphically in the Attachment B1c.

These access points will be used as ingress and egress for trucks hauling in rock fill material and exiting empty. The haul trucks are typically 10 - and 12 - wheel dump trucks with a maximum gross vehicle weight of 64,000 lbs. and an empty weight of 26,000 lbs. The trucks have an 8 ft. wide wheel track and an 18.5 to 22 ft. long wheelbase. The estimated cubic yards of fill material needed were used to estimate 75 trips per day for dump truck traffic. In addition to the dump trucks, other equipment using the levees include pans, bulldozers, excavators, graders, front end loaders as presented Table DEP RAI1, Attachment B1c. FPL will work with MDC to avoid conflicts of access and use.

FPL will video record and document the pre-use levee condition. In addition, a pre-use survey (toe to toe) will be conducted of the sections of Well Protection Canal berm, 122nd Avenue and Pennsuco Canal Road that will be used for access and equipment traffic. A post use survey showing grades at the same locations as the pre-use survey will be prepared when construction is completed. The areas of proposed fill along the levees will be cleared and grubbed prior to placement of fill. The integrity of the levees will be maintained by FPL at their existing condition throughout the duration of the proposed use. The Pennsuco Canal Road will be improved by clearing up to a 20 foot-wide path along the road and restoring /grading the existing road to a maximum 14 foot width.

4. *The certified corridor from the Dade/Broward Line to Levee Substation will cross canal reservations, canal rights-of-way or other proprietary areas of Miami-Dade County. Additional information regarding the placement of structure pads, access/maintenance roads, culverts, fill materials or other related activities that may occur within canal reservations, canal rights-of-way or other proprietary areas of Miami-Dade County is required. Based on the information provided by FPL, Miami-Dade County may require the proposed facilities to be relocated out of canal reservations, canal rights-of-way or other proprietary areas of Miami-Dade County.*

The locations of MDC canal reservations, easements, and proprietary areas relative to the 200 ft. wide FPL transmission line ROW are shown in Attachment A5. The 200 ft. TLISA ROW was selected based on input from agencies, Conditions of Certification, and in Appendix F of the Conditions of Certification. Exhibit C, Item 5 of Appendix F, limited ROW position to the east side of the Miami-Broward levee except at Thompson Park resulting in a westerly location as stated in the following excerpt from the stipulation:

“Item 5. From the Levee Substation north to the southern boundary of Thompson Park, except for the portion of the corridor which goes in an east-west direction, the corridor shall be limited to 400 feet immediately east of the east bank of the Dade-Broward Levee, which is the levee to the west of the Dade-Broward Levee Canal.”

5. *The certified corridor from the Dade/Broward Line to Levee Substation will cross canal reservations, canal rights-of-way or other proprietary areas of Miami-Dade County. The placement of structure pads, access/maintenance*

roads, culverts, fill materials or other related activities may also occur within canal reservations, canal rights-of-way or other proprietary areas of Miami-Dade County. The Permittee shall not engage in any activity that interferes with Miami-Dade County's use and operation of canal reservations, canal rights-of-way or other proprietary areas of Miami-Dade County.

The locations of MDC canal reservations, easements, and proprietary areas relative to the 200 ft. wide FPL transmission line right of way (ROW) are shown in Attachment A5. The ROW was selected based on input from agencies, Conditions of Certification, and the Stipulation between FPL and Miami-Dade County in Appendix F of the Conditions of Certification. Exhibit C, Item 5 of the stipulation limited ROW position to the east side of the Miami-Broward levee except at Thompson Park resulting in a westerly location as stated in the following excerpt from the stipulation:

"Item 5. From the Levee Substation north to the southern boundary of Thompson Park, except for the portion of the corridor which goes in an east-west direction, the corridor shall be limited to 400 feet immediately east of the east bank of the Dade-Broward Levee, which is the levee to the west of the Dade-Broward Levee Canal."

Since the location was selected through the TLSA process and easements have been obtained in the selected location, the original corridor is no longer available. Therefore, the construction cannot be relocated out of the designated ROW. FPL will work with MDC to avoid conflicts of access and use.

6. *In areas where the transmission line will be located within canal reservations, canal rights-of-way or other proprietary areas of Miami-Dade County, the Permittee shall conduct surveys of the structural integrity of County levees, if utilized, and obtain Miami-Dade County's concurrence regarding the location, nature, and type of any specific levee improvements proposed by the Permittee.*

FPL has requested information on the existing Wellfield Protection Canal Berms from MDC. Upon receiving and review of the information, FPL may conduct additional studies, if needed. These may consist of items such as geotechnical analysis and field surveys.

7. *The Permittee shall notify and submit to Miami-Dade County a plan to address all requirements outlined in Section II.E.3 of the Conditions of Certification.*

FPL will use appropriate stormwater Best Management Practices (BMPs) to prevent the offsite erosion and sedimentation during construction. Prior to start of construction, FPL's contractor will provide the FDEP a "Notice of Intent" to construct the project pursuant to the "Generic Permit for Stormwater Discharge from Large and Small Construction Activities" (Chapter 62-21.300 F.A.C.). The contractor will develop a Stormwater Pollution Prevention Plan (SWPPP) and conduct weekly stormwater inspections (or more frequently as required) for the project. The contractor will utilize turbidity curtains, silt fence, hay bales, and other approved containment devices to prevent impacts to wetlands/surface waters outside of the construction corridor.

All erosion/sedimentation control measures will be staked/secured appropriately and will remain in place until "All soil disturbing activities at the site have been completed, and that a uniform vegetative cover with a density of at least 70% has been established or equivalent permanent stabilization measures have been employed." FPL will be responsible for educating construction personnel prior to the commencement of construction activities on

the importance of proper installation and maintenance of the erosion/turbidity control devices.

8. *The Permittee shall notify and submit to Miami-Dade County a plan for any dewatering operation and provide reasonable assurances to Miami-Dade County that no adverse impacts to surface or ground waters in the surrounding areas will occur as a result of the operation.*

The proposed construction activities do not require any dewatering activities.

9. *The Permittee shall provide information to demonstrate compliance with the stipulated Conditions of Certification including protection of the Northwest Wellfield Protection Area, pursuant to DOAH Case No. 89- 279 between FPL and Miami-Dade County.*

FPL shall not use herbicides for ROW maintenance in the NW Wellfield Protection Area as stated in the following excerpt from the Stipulation between FPL and MDC in Appendix F of the Conditions of Certification, Exhibit C, Item 1:

“Item 1 Herbicides shall not be used in ROW maintenance in the Northwest Wellfield Protection Area in Dade County”.

C. Broward County

1. Public Works Department

- a. There are possible concerns with the overhead line structures proposed to be sited within Everglades Holiday Park. More information on the construction details is needed to evaluate potential impacts to park operations. The proposed structures and foundation pad appear to be sited directly over and adjacent to an existing road that provides access to the west area of the Park and it appears that FPL proposes to utilize the Park for both construction phase and long-term maintenance access.*

FPL has initiated contact with Mr. Martin Gross (Broward County Construction and Engineering-Parks Planning and Design) to discuss coordination of the proposed FPL and EHP projects. Attachment A4 includes Figure 3 - RAI (EHP), which shows the FPL Right-of-Way and Structure 502 in relation to the referenced existing access road, with an overlay of the proposed EHP Park improvements.

To alleviate construction activities within the park, FPL is proposing to replace the originally proposed east/west access road, south of the park entrance (levee L-33 to pad 503), with an access road east of Pines Blvd. This will reduce construction and future maintenance traffic through EHP to only FPL Structure 502 and the attached conductors for adjacent spans. The remainder of construction activities will be completed using the proposed Pines Blvd. Access Road. Additional wetland impacts are not proposed.

FPL intends to closely coordinate with EHP to minimize impacts to their operation from construction. FPL Structure 502 is approximately 20' away from the existing road edge of pavement. Over the entire construction period for the transmission lines, construction crews and equipment will be present at each work location (e.g. Structure 502) at irregular intervals for short durations. These durations will vary for each phase of construction but will usually be only a few days. FPL intends to coordinate grading of the proposed structure pad area with the existing road for uniformity and allow the access to remain unaltered within EHP.

After construction, FPL operations and maintenance traffic is expected to be minimal. This typically includes regular inspection of the poles, conductors, insulators, hardware, access areas, and vegetation in proximity to the facilities. The inspections will primarily consist of ground patrols (truck) but may also include aerial (helicopter/airplane) patrols. Electric transmission lines normally require minimal maintenance; however, FPL will inspect the transmission lines on a regular basis to look for problems caused by weather, vandalism, vegetation regrowth, etc.

- b. Currently, it appears that the proposed FPL transmission line will stay west of US 27, so we don't believe it poses any concern for us at the Broward County Landfill. However, there could be concerns if any projects were sited on the east side of US 27, adjacent to the Broward County Landfill.*

Acknowledged. FPL is not proposing any permanent structures on the east side of US 27.

2. Parks and Recreation Division

- a. Construction details of pad 502 which appears to be located directly over the park road providing access to the west portion of Everglades Holiday Park. We need to be able to evaluate any potential impacts to this access road.*

Please see Attachment A4 showing the location of FPL Structure 502 adjacent to the existing road. FPL intends to closely coordinate with EHP to minimize impacts to their operation from construction. FPL Structure 502 is approximately 20' away from the existing road edge of pavement. Please see responses C1a for additional information.

- b. *FPL's proposed access to pad 502 for construction and long-term maintenance. If this access is proposed to be from Griffin Road and through the Everglades Holiday Park site, how does FPL intend to acquire access rights through Everglades Holiday Park.*

Access through EHP has been reduced to the activities required to construct, operate, and maintain structure 502 by relocating the proposed access to Pines Blvd. Access to EHP for these activities is authorized by SFWMD permit 9713, which is attached for reference.

In addition, please see Attachment A1 for easement information which provides access over the Grantor's (Broward County's) adjoining lands and Attachment A4, Figure 3 EHP for the FPL ROW location relative to EHP and its proposed improvements. The access over adjoining land is stated in the following excerpt from easement P3.2-E100.1:

"...and the right of reasonable ingress and egress for personnel and equipment of Grantee, its contractors, agents, successors or assigns, over the adjoining lands of the Grantors for the purpose of exercise and enjoying the rights granted by this easement and any or all of the rights granted hereunder."

- c. *To preempt Broward County's concerns with potential permanent impacts to the west park access road and potential significant impacts to park operations during construction, it is recommended that FPL relocate pad 502 to the south with access to 502 by means of extending the proposed access road from pad 503.*

The typical transmission line is designed with span lengths of approximately 1,300 ft. The distance between poles on pads 501 and 502 has been designed to be 1,700 ft. to cross the three canals north of structure 502. Moving the structure would increase the span between the two structures. The pole to the north of 502 is an angle dead end, which must be guyed and anchored to handle the forces associated with the adjacent spans of conductors. Increasing the span length to the south (to pole 502) would increase these forces and the associated guying/anchoring requirement to the north. The guys and anchors would be longer; and would extend further into the wetlands, with greater wetland impact.

The construction of a road between structures 501 and 502 would also require additional wetland impacts that are not approved by the TLSA Conditions of Certification (COC). Wetland impacts were reduced to the minimum amount to construct the project in compliance with the COCs. FPL is also required by the COCs to utilize existing roads when feasible to construct the transmission line. Structure 502 is positioned 20 ft. south of the west park access road and is not anticipated to significantly affect park operations during construction, operation, and maintenance of the structure.

- d. *FPL should know that there are major construction activities scheduled to occur within and adjacent to Everglades Holiday Park. Construction of the SFWMD S-9 Bridge Replacement is scheduled to begin in April 2017, with an associated 1½ year construction period. A reconstruction of the Everglades Holiday Park Site, which includes a major reconfiguration of internal park roads and parking, and new water, sewer,*

lighting, and fire protection infrastructure, is scheduled to begin in the spring of 2018. Additional information regarding FPL's intended or anticipated use of FPL Response 2d. Everglades Holiday Park and adjacent state lands or South Florida Water Management District lands for access, storage, and construction is requested.

FPL intends to require access of the park roads only for construction of Pad 502 and its associated pole/wire installation. Pad 502 is isolated from the remainder of the access road construction so the rest of the proposed transmission line improvements are not time dependent upon Pad 502 construction. Therefore, FPL proposes to work with Broward County and its Park Manager, to identify "windows" when construction of Pad 502 is most convenient for both parties. FPL will request its contractors to work within these "windows" to minimize effects to the construction of the park improvements. Staging will generally be kept within or immediately adjacent to the 200 foot wide FPL ROW. Any additional areas will be identified and coordinated with EHP prior to use. At the conclusion of construction, Pad 502 will be seeded or sodded and the temporary work or laydown areas will be restored and stabilized to pre-existing conditions.

3. *Environmental Protection and Community Resilience Division*

- a. *The East Coast Protective Levee is required to be certified pursuant to 44 CFR 65.10 to receive FEMA accreditation. During the most recent update to the FEMA Flood Insurance Rate Maps, SFWMD performed a series of improvements to the Broward County portions of the East Coast Protective Levee to enable the levee to meet the FEMA accreditation standards and provide protection from the base flood. According to the SFWMD, \$18 million in required levee improvements included: isolated seepage repairs (to address high exit gradients), isolated increases in crest elevation, flattening of eastern portions of the levee and construction of downstream toe berms along levee alignments.*

Acknowledged.

- b. *The proposed project must not adversely impact the levee's compliance with the FEMA accreditation standards, which currently require the levee crest be at least a foot higher than the height of maximum wave run-up associated with the 100-yr design storm event including projected wind speed and direction effects. It is noted that the report prepared for the Post Certification Levee-Midway 500kv Transmission Line references the AMEC report titled "Volume 1, Freeboard Assessment Report, Technical Evaluation of East Coast Protective Levee, Broward County", the estimated 100-year storm water elevation of 8.4 ft. NAVD in this area from said report, and proposes road and pad elevations at elevation 8.9 ft. NAVD to provide 0.5 feet of freeboard. The AMEC modeling performed to determine the maximum wave run-up and set-up should be evaluated to ensure the levee crest will maintain the required one foot of freeboard post construction of the proposed transmission line improvements.*

Water Conservation Area 3A (WCA) is 770 square miles. Because of the large surface area of the WCA relative to the road, the expected change in elevation is negligible. As provided in Attachment C3b, per Table 19 of the AMEC report titled "Volume 1, Freeboard Assessment Report Technical Evaluation of East Coast Protective Levee, Broward County, Florida", the available freeboard from a 100-year storm with wave run up from Category I hurricane ranges from 6.6 to 7.7 ft. for Levee L-33. In addition, the effect of the road installed approximately 1,300 ft. from the L-33 Levee, will likely reduce the predicted wave height, since it will divide the reach of the wind into two sections.

Therefore, the FPL project fill would have a negligible effect on levee wave run up and the FEMA minimum required one foot freeboard should not be adversely affected.

- c. *In addition, it is recommended that the USACE WPA project address potential changes in seepage resulting from construction of the transmission lines to ensure that the Broward County Water Preserve Area (WPA) project, recommended as part of CERP, is not adversely impacted in its objective to manage seepage losses for Water Conservation Area (WCA) 3A/3B.*

Since the road and pad construction does not involve removal of vegetation and root mat except in areas involving melaleuca tree stump removal, we do not expect any significant effect on the current seepage rates related to the levees. Drilled shaft construction for pole and anchor foundations in Broward County will be approximately 1,200 ft. from the L-33 Levee and would not adversely impact seepage rates related to the levees.

- d. *Work proposed along the levee is not in a protected natural land associated with the County bond program or in an area that would have direct impacts to the County's land preservation program obligations.*

Acknowledged.

Thank you for your attention and consideration of this RAI response. If you have any questions regarding this submittal, please do not hesitate to contact Daniel Moretz at 561-681-2914

Sincerely,



Jena S. Mier
Manager, FPL Licensing and Permitting