

**ENVIRONMENTAL ASSESSMENT FORM
FOR
AIRPORT DEVELOPMENT ACTIONS**

**FEDERAL AVIATION ADMINISTRATION
ORLANDO AIRPORTS DISTRICT OFFICE
SOUTHERN REGION AIRPORTS DIVISION**

Airport Name: Tallahassee International Airport

Proposed Action: Construction and Operation of FL Solar 4, LLC and Tallahassee International Airport Solar Project 2

This Environmental Assessment becomes a Federal document when evaluated and signed by the responsible FAA official.

Responsible FAA Official: *Scott Starnall*

Date: 6/21/2019

This Environmental Assessment (EA) Form is intended for use in the Federal Aviation Administration (FAA) Orlando Airports District Office (ORL/ADO) only, and with the approval of an ORL/ADO Environmental Protection Specialist (EPS). The Airport Sponsor must discuss the use of this EA Form with an ORL/ADO EPS before beginning the EA scoping and environmental analysis process. An electronic version of this EA Form is available upon request from an ORL/ADO EPS.

APPLICABILITY

The purpose of an EA is to determine whether a proposed action has the potential to significantly affect the human environment (see FAA Order 1050.1F, Paragraph 4-3 for more information on determining significance). An EA is a concise public document that briefly provides sufficient evidence and analysis for determining whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significance (FONSI). An EA, at a minimum, must be prepared when the proposed action does not normally require an EIS (see Paragraph 3-13, Actions Normally Requiring an Environmental Impact Statement) and:

- 1) Does not fall within the scope of a Categorical Exclusion (CATEX) (see FAA Order 1050.1F, Paragraph 5-6 *The Federal Aviation Administration's Categorical Exclusions*);
- 2) Falls within the scope of a CATEX, but there are one or more Extraordinary Circumstances (see FAA Order 1050.1F, Paragraph 5-2 *Extraordinary Circumstances*).

INSTRUCTIONS

Introduction: This EA Form is based upon the guidance in FAA Order 1050.1F – *Environmental Impacts: Policies and Procedures*, and the related publication FAA Order 1050.1F Desk Reference (1050.1F Desk Reference). The Order provides the FAA policies and procedures to ensure agency compliance with the National Environmental Policy Act (NEPA) (42 United States Code [U.S.C.] §§ 4321-4335), the requirements set forth in the Council on Environmental Quality (CEQ), Title 40, Code of Federal Regulations (CFR), parts 1500-1508, *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act* (CEQ Regulations), and Department of Transportation (DOT) Order 5610.1C, *Procedures for Considering Environmental Impacts*. The CEQ Regulations establish procedures for complying with NEPA. In accordance with 40 CFR § 1507.3 of the CEQ Regulations, the Order contains the FAA’s implementing procedures, which supplement those regulations. The 1050.1F Desk Reference provides details on current guidance and updated technical information. This includes information about permits, licenses, consultations, and other forms of approval or review; up-to-date details on technical information such as FAA-approved tools for analyzing noise and air emissions; overviews of special purpose laws and requirements; and specific responsibilities and guidance for gathering data, assessing impacts, consulting other agencies, and involving the public.

Early Planning: Environmental issues should be identified and considered early in a proposed action’s planning process to ensure efficient, timely, and effective environmental review. Preparation for any applicable permit application and other review process requirements should be part of the planning process to ensure that necessary information is collected and provided to the permitting or reviewing agencies in a timely manner. The Airport Sponsor should identify known environmental impact categories that the Action and alternatives (if any) could affect, including specially protected resources. These tasks should be completed at the earliest possible time during Action planning to ensure full consideration of all environmental impact categories and facilitate the FAA’s NEPA process. Sufficient planning and Action justification must be available to support the environmental review.

IMPORTANT

The Airport Sponsor must contact their ORL/ADO Program Manager if the Proposed Action is not depicted on the Airport’s conditionally-approved ALP. The ORL/ADO will determine if an update to the ALP is required. If an interim ALP update is required, coordination and approval can take up to 90 days and must be finalized prior to an environmental decision.

The Proposed Project is depicted on the Airport’s draft ALP. The draft updated ALP depicting the Proposed Project has been submitted to the FAA for review and approval.

A Proposed Action’s pre-application for federal funding (design or construction) must include an environmental finding in accordance with NEPA. Pre-applications are normally due in the ORL/ADO in January in order to receive a grant for the following fiscal year. The Airport Sponsor should allow 6-12 months prior to submitting a pre-application to the ORL/ADO for federal funding to complete the EA process.

The Airport Sponsor is not applying for the FAA funds for the design and construction of the Proposed Project.

1. PROPOSED ACTION LOCATION

Airport Name and Identifier: Tallahassee International Airport (TLH)
Airport Address: 3300 Capital Circle SW
City: Tallahassee **County:** Leon
State: Florida **Zip Code:** 32310

2A. AIRPORT SPONSOR INFORMATION

Point of Contact: Alisha Wetherell, Project Engineer, Tallahassee International Airport
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3. PREPARER INFORMATION

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4. PROPOSED ACTION

Describe the Proposed Action with sufficient detail in terms that are understandable to individuals who are not familiar with aviation or commercial aerospace activities. List and describe all components of the Proposed Action including all connected actions. Summarize how the Proposed Action fits into the Airport’s ALP. Attach an exhibit of the Airport’s conditionally approved ALP depicting the Proposed Action, and an exhibit of the Proposed Action on a recent airport aerial. Summarize costs, including any mitigation costs, if applicable. Discuss how the Proposed Action will be funded. Provide a timeframe identifying when the Proposed Action is to be constructed and operational.

Introduction

The City of Tallahassee has requested environmental approval from the Federal Aviation Administration (FAA) for the installation of solar power energy generating equipment at the Tallahassee International Airport (TLH or Airport). In accordance with the National Environmental Policy Act, the City, as Airport Sponsor, has prepared this Environmental Assessment (EA) with assistance from the City of Tallahassee Electric Utility (Utility) and FL Solar 4 LLC. If approved, the project would construct and operate a nominal 40-megawatt AC (40 MWac) solar photovoltaic energy generating facility (Solar Farm 2 or solar farm) within the property limits of TLH.

Airport Background

TLH is owned and operated by the City of Tallahassee. The Airport is located in Leon County, on the southwest side of Tallahassee, at 3300 Capital Circle SW (**Attachment A: Figure 1 –Project Location**). TLH is a Part 139 Class I airport, which is an airport serving scheduled operations for air carrier aircraft designed for at least 31 passengers. A commercial service airport is defined as a public airport in a State that the Secretary determines has at least 2,500 passenger boardings each year and is receiving scheduled passenger service. A non-hub airport is a commercial service airport that has less than 0.05 percent of the passenger boardings¹. TLH is classified as a Non-hub Commercial Service airport. The Airport’s existing facilities include two runways (RW):

- RW 18-36, which is 7,000 feet long and 150 feet wide, and
- RW 9-27, which is 8,000 feet long and 150 feet wide.

TLH focuses primarily on customer service by providing facilities for commercial airline service and operation of general aviation aircraft as well as providing for military and air cargo aircraft operations, implementing advanced technology and practicing good environmental stewardship.

Proposed Project

TLH’s Solar Farm Project consists of two phases. Phase 1 is a 120-acre solar farm located south of Runway 18-36 that was constructed in 2017 which is depicted as Solar Farm 1 in **Figure 1 – Project Location**. The Proposed Project consists of the construction and operation of the second phase of a solar farm facility at TLH (**Figure 1 – Project Location**). To facilitate the installation of the solar farm, the Airport will lease 317.37 acres of property to the Utility. Approximately 307 acres of the 317.37-acre site will be used to construct the solar panels and arrays and associated structures. The Utility would then contract with a private company (FL Solar 4) to construct, own, operate and maintain the solar farm. The solar farm capacity is 55 megawatt (MW) direct current (dc) or 45 MW

¹ <https://www.law.cornell.edu/uscode/text/49/47102>

alternating current (ac). The Proposed Project interconnection will be limited to 42 MWac of electrical power that could be fed to the City of Tallahassee's electrical grid. An additional 8,256 linear feet of existing Airport internal unpaved roads would be widened to 20 feet and improved to provide access to the Proposed Project resulting in 8.22 acres of improved unpaved road. The temporary north Airport internal access road is approximately 2,780 feet in length or 2.54 acres and the south Airport internal access road is approximately 5,476 feet in length or 5.68 acres.

The solar farm facility will involve the installation of solar photovoltaic modules arranged in arrays, 18 Power Conversion Stations (PCS) with inverters, an electric substation, electric utility poles, stormwater treatment system, internal 14-foot wide access roads, and associated telecommunication equipment and electrical collection system comprised of underground cables and combiner boxes, and strengthening and widening of two existing Airport internal unpaved access roads (**Attachment A: Figure 2- Project Area**). A minimum of a 300-acre parcel is required to accommodate a nominally rated 40-MWac solar farm.

Proposed Project Location Anticipated Impacts and Permitting

The Proposed Project would be located on airport property, which is owned by the City. The solar farm will be constructed on a 307-acre area of the 317.37 leased site that is located on the western region of the Airport, west of Runway 18-36. (**Attachment A: Figure 2 - Project Area**). The proposed location of the solar farm site has been previously cleared of vegetation except for a few trees, tree stumps, and shrubs that remain. Based upon the review of available literature, Geographic Information System (GIS) data and mapping, and environmental and cultural resource field surveys conducted in February, March, and May of 2016, and in May, August, October and December 2018, the Proposed Project is not anticipated to have impacts on floodplains, wetlands, and cultural, historic and archeological resources. Gopher tortoise using the Proposed Project area will be relocated to nearby Apalachicola National Forest Gopher Tortoise Research Center, a state-permitted gopher tortoise recipient site.

Draft ALP

TLH's draft Airport Layout Plan (ALP) depicts the location of the Proposed Project which is currently under FAA review.

Lease Terms

The proposed lease term would be for 20 years with three renewal options for up to another 15 years that could extend the lease for a total of 35 years, the anticipated operational life of the solar facility.

Funding

The project is being financed using funds from the sale of electricity by the City of Tallahassee. The project will not utilize any federal or state funding.

Design, Construction and Operation

Schedule

A summary of the Proposed Project’s development schedule is presented in **Table 1**. Development of the design plans and preparation of the necessary permit applications to construct the Proposed Project is being done concurrently with the EA development. Construction is anticipated to commence in spring 2019. Construction duration is estimated at seven months. The solar farm is anticipated to be operational sometime in December 2019.

Table 1

SOLAR FARM 2 DEVELOPMENT SCHEDULE

Development Phase	Anticipated Duration
Environmental Assessment	December 2018 to April 2019
Design and Permitting	July 2018 to April 2019
Construction	May 2019 to December 2019
Operational	December 2019

Conceptual Design

The conceptual design for the solar farm consists of a total of 126,700 First Solar 435-watt modules organized into arrays and linked into parallel strings. The modules will be mounted on fixed tilted racks with steel pile supports. Each of the arrays will connect to one of 18 PCS with 2,500-volt inverters within the project area. Electricity from the inverters will be conveyed to the BP 34, the project substation through a medium voltage collection system (**Attachment A: Figure 3 –Conceptual Layout**). BP 34 will be connected to the City electric grid through a “tap” that involves three 40-foot electric utility steel poles and associated transmission line materials (**Attachment A: Figure 2 – Project Area**). The solar farm arrays will be separated from the adjacent National Forest property by a 30-foot perimeter buffer area which would include a 12-foot grass buffer, a security perimeter fence within a 4-foot grass buffer, and 14-foot wide access road.

Construction

Approximately 15 pieces of equipment (on average) are anticipated to be onsite daily during construction. The first part of construction would involve heavy equipment for clearing, grubbing and grading. The second part would involve smaller equipment for installing facility equipment and conducting finish work. Construction staging would occur within the limits of the Proposed Project Site. This area is also designated for the storage of the job trailer and construction equipment. No fill material is anticipated to be brought onto or exported from the Proposed Project site. Current plans for site grading are phased so that grading of an area would take place shortly before facility installation to minimize exposed soil at any one time and minimize dust and potential erosion. Erosion and sediment control measures will be implemented prior to, during and after construction is completed.

Fixed-tilt arrays would be constructed in rows oriented in two different azimuths (an optimal 180 degrees and a modified 214 degrees). These different orientations were selected to avoid creating glare and maximize energy production. The modules would be positioned at a fixed tilt angle to receive solar energy. The optimal angle for this location is normally 25 degrees, which was also modified to 30 degrees in certain portions of the array to avoid creating glare seen by aircraft utilizing the airport.

Arrays are proposed to be arranged as follows:

- Subarray 1 (North) is oriented 180 azimuth, due south, with 25-degree tilt
- Subarray 2 (Mid) is oriented 214 azimuth, with 25-degree tilt
- Subarray 3 (South) is oriented 214 azimuth, with 30-degree tilt (**Attachment A: Figure 3 –Conceptual Layout**).

Access

Access to the Proposed Project site will be through an existing Airport internal unpaved road west of Capital Circle Southwest and north of Runway 18 End and an existing Airport internal unpaved road south and west of Runway 36 End, north of Springhill Road (**Attachment A: Figure 3 – Conceptual Layout**). Both internal unpaved Airport access roads can only be used by authorized Airport personnel and are secured by a locking gate. These roads would be widened to 20 feet and improved to meet City of Tallahassee emergency vehicle access and accommodate construction equipment, construction material delivery, and operations and maintenance access after construction is completed. These standards include compaction of native subgrade material and six (6) inches of #4 crushed limestone rock as a road surface. Roadside ditches and side slopes would be designed to accommodate storm water runoff. The north Airport internal access road would be used during construction only and will be abandoned after construction of the Proposed Project is completed. The south Airport internal access road would be used to access the Proposed Project during and after construction is completed.

Construction Cost

The Proposed Project's construction cost is estimated at approximately \$48,000,000.00

Operation and Maintenance

Operation and maintenance activities associated with the Proposed Project would be minimal and will be provided by FL Solar 4, LLC. The facility would operate during daylight hours only. The facility does not require full-time employees to be onsite. The system is remotely monitored, and maintenance personnel are dispatched as needed. The site security is achieved via electronic surveillance and local law enforcement or facility personnel that are dispatched as needed. Access to the Proposed Project site will be through the secured access road.

Airport operations personnel would routinely patrol the site. Solar company staff would be onsite on an as-needed basis to check that the facility is functioning optimally. At times when major maintenance or repair is required, additional workers or contractor laborers would be utilized by the solar company

Long-term operation would include periodic maintenance and equipment servicing per the manufacturer's recommendations. Moving parts, such as motorized circuit breakers/disconnects, and inverter ventilation equipment would be maintained on a regular basis. Additional maintenance would take place as required.

Vehicles that would be used as part of maintenance may include trucks, all-terrain forklifts, and loaders. Water trucks would be used to wash the solar panels as needed. Larger off-road equipment may be brought onsite on an as-needed basis for replacement or repair purposes.

Decommissioning

The solar modules and some of the other components of the solar farm are expected to have a useful life of at least 35 years; however, solar industry experience indicates that the operational life of the solar facility could be up to 40 years. The Proposed Project is expected to have a useful life of 25 to 30 years, but for planning purposes the Proposed Project has a life of 35 years. At the end of 35 years, the Proposed Project site may be decommissioned and restored to the conditions found prior to the start of construction.

Activities associated with decommissioning of a solar farm are expected to be similar to those in the initial construction. When the Utility terminates the project, and if an upgrade is not considered, the Utility would sell, reuse, or recycle salvageable items, as appropriate; unsalvageable material would be disposed of at authorized sites.

5. PURPOSE AND NEED

(1) Describe the underlying purpose and need for the Proposed Action. Present the problem being addressed, describe what the Airport Sponsor is trying to achieve with the Proposed Action, and take into account the FAA’s primary mission to provide the safest, most efficient aerospace system in the world. The purpose and need of the Proposed Action must be clearly explained and stated in terms that are understandable to individuals who are not familiar with aviation or commercial aerospace activities. The purpose and need must be supported by recent data. To keep this section brief, incorporate by reference any supporting data, inventories, assessments, analyses, or studies. This can include but is not limited to FAA compliance or standard changes, letters from users showing need per FAA design standards, letters of commitment from current or prospective tenants, based aircraft data, fuel data, scheduled service, critical aircraft needs, TAF and Master Plan forecasts, capacity issues (actual use/need of aircraft or airline, or scheduled commercial service. **IMPORTANT: If the Airport Sponsor intends to request Federal funding, the purpose and need for the Proposed Action must be justified by recent airport planning analysis and concurred with by ADO management before initiating the EA.**

PURPOSE AND NEED

The Proposed Project is part of the City of Tallahassee’s strategy to diversify fuel supply, reduce the City’s reliance on fossil fuels and reduce carbon emissions generated with electric power generation. This strategy began with the Green Initiatives Annual Report of 2008 and later updated in the City’s *Green Print - “A Roadmap to a More Sustainable Future”*. As part of the City’s operations, the Airport and the Utility are included in the strategy. The 20 MWac Solar PV project, located at the airport, is Phase 1 of the strategy. The Proposed Project is phase 2 of the City’s strategy and will provide 40-megawatt AC of solar photovoltaic generation to the City of Tallahassee’s electrical system. The purpose of the Proposed Action is to generate clean energy, increase energy independence, and decrease the reliance on electricity generated by fossil fuel power plants. The project also brings price certainty to the City’s electric customers by fixing the price of a portion of the energy charge for 20 plus years. The Airport, through its planning process, determined that the project site has very limited aeronautical and non-aeronautical use and the Proposed Project would be the best use of the property. The Proposed Project is necessary to increase economic contribution from non-aviation uses on Airport property. As more companies become aware of their impacts to the environment, they are now considering the sustainable and carbon reduction goals of the property owners in their decisions to relocate. The Proposed Project supports these decisions by providing an economic and sustainable development at the Airport, contributes to the Airport’s economic diversification and helps reduce the City of Tallahassee’s carbon footprint.

(2) Identify the Airport Sponsor’s requested FAA Federal action in the space below. For the FAA Office of Airports (ARP), a Federal action may include one or more actions (See FAA Order 5050.4B, Paragraph 9.g.). Note: The information provided in this EA Form allows the FAA to determine if a Finding of No Significant Impact (FONSI) can be issued because the proposed action’s environmental impacts, with no additional mitigation,

would not be significant, or a mitigated FONSI can be issued because the proposed action's environmental impacts, with additional mitigation, would not be significant (see FAA Order 1050.1F, Paragraph 6-2.3a). FAA environmental findings on an Action do not constitute FAA decisions or approvals regarding Federal funding of the Action.

FEDERAL ACTIONS

Unconditional approval of the portion of the TLH Airport Layout Plan (ALP) that depicts the proposed solar farm array and connected actions pursuant to 49 U.S.C. Sections 47107(a)(16), 40103(b), 44718 and Title 14 CFR Parts 77, 157, and 139. Approval to release a portion of the TLH property for non-aeronautical use pursuant to U.S.C. §47153.

6. ALTERNATIVES (INCLUDING THE PROPOSED ACTION)

There is no requirement for a specific number of alternatives or a specific range of alternatives to be included in an EA. Alternatives are to be considered to the degree commensurate with the nature of the proposed Action and agency experience with the environmental issues involved. The Sponsor's preferred alternative, if one has been identified, should be indicated. For alternatives considered but eliminated from further study, the EA should briefly explain why these were eliminated. Note: An EA may limit the range of alternatives to the proposed action and no action when there are no unresolved conflicts concerning alternative uses of available resources. This means that you may limit the range of alternatives to the proposed action and no action if you can establish consensus based on input from interested parties that there are no unresolved conflicts, or if there are no reasonable alternatives that would be substantially different in design or effects. If you are able to do this, you must document the basis for concluding consensus and identify the parties that participated; and, you must discuss why there are no reasonable alternatives that would be substantially different in design or effects. This is why the Purpose and Need is important in helping define the range of alternatives.

(1) Discuss in comparable format to that listed below the Proposed Action and alternatives. Discuss how the Proposed Action and alternatives were developed e.g. recent planning study or Master Plan Update. Attach figures for the Proposed Action and alternatives to aid in understanding the physical layout and differences in the alternative configurations.

For each alternative:

a. Discuss to what extent an alternative meets the Purpose and Need.

b. Discuss if an alternative is technically and economically feasible e.g. operational considerations/regulations, safety considerations, constructability, infrastructure requirements, property acquisition requirements, and costs.

c. Discuss potential social, socioeconomic, and/or environmental resource impacts for each alternative e.g. business or residential relocations, road relocations or closures, environmental resources protected under federal statutes (wetlands, floodplains, and listed species, and Section 4(f), or Section 106 resources).

d. For each alternative considered but eliminated from further study, summarize why it is not considered reasonable. Note: *To be reasonable, an alternative must respond*

to the purpose and need, be technically and economically feasible, and be reasonably consistent with the land use plan for management of the area.

ALTERNATIVES DEVELOPMENT

An alternative siting analysis was conducted to evaluate potential on-airport locations for the solar farm (**Attachment A: Figure 4 –Solar Farm Alternative Locations**). Five on-airport alternatives were developed based on the availability of developable land, taking into consideration efforts to minimize interruption to airport service, potential issues associated with construction cost, constraints presented by environmental resources and associated regulations, and compliance with FAA design standards, federal grant obligations and Part 139 certificate requirements which ensure the safe operation of the airport. Following are brief descriptions of each alternative solar farm site:

1) Alternative A

This alternative is located in Parcel A, which is approximately 75 acres in size. It is in the northern part of the Airport, east of Runway 18-36 and on the west side of Capital Circle SW (**Attachment A: Figure 4 –Alternative Locations**). This parcel is located outside of the Runway Protection Zone (RPZ). The site is maintained upland dominated by grasses, is mowed regularly, and contains suitable habitat for gopher tortoises. It can be accessed from Capital Circle SW. This alternative does not contain wetlands and construction can be completed with no wetland impact. The most recent Airport Master Plan has determined this parcel to be best suited for aviation related commercial development.

2) Alternative B

Alternative B is located in Parcel B, which is approximately 28 acres in size. It is in the eastern part of the Airport, northeast of the eastern end of Runway 9-27 and south of Capital Circle SW (**Attachment A: Figure 4 –Alternative Locations**). This parcel is located outside of the RPZ. The site was historically pine flatwoods, but it has been cleared and now land cover consists of some remnant trees, tree stumps and shrubs. It contains suitable habitat for gopher tortoises. This alternative does not contain wetlands and construction can be completed with no wetland impact. The most recent Airport Master Plan has determined this parcel to be best suited for aviation related commercial development.

3) Alternative C

Alternative C is located in Parcel C, which is approximately 58 acres in size. It is in the eastern part of the Airport, northeast of the eastern end of Runway 9-27 and north of the intersection of Capital Circle SW and Springhill Road and immediately east of Alternative B (**Attachment A: Figure 4 –Alternative Locations**). This parcel is located outside of the RPZ. The site was historically a coniferous plantation. It has been cleared and currently land cover is characterized by some remnant trees, tree stumps, and shrubs. The site contains

suitable habitat for gopher tortoises. This alternative does not contain wetlands and construction can be completed with no wetland impact. The most recent Airport Master Plan has determined this parcel to be best suited for airport-compatible land uses that include, but would not be limited to, surface freight logistics, light industrial, commercial allied aviation services, and/or manufacturing.

4) Alternative D

Alternative D is located in Parcel D, which is approximately 174 acres in size. It is in the eastern part of the Airport, northeast of the eastern end of Runway 9-27, east of the intersection of Capital Circle SW and Springhill Road and immediately east of Alternative C. This parcel is located outside of the RPZ. The site was historically an upland hardwood/pine flatwood/longleaf pine xeric oak forest that was cleared and now contains remnant trees, tree stumps and shrubs. Based on a review of Northwest Florida Water Management District land cover mapping, 7.3 acres of wetlands and 3.4 acres of surface waters occur along the site's eastern border. Construction of the Proposed Project at this site will result in unavoidable wetland impact. The uplands within the site contain suitable habitat for gopher tortoises. (**Attachment A: Figure 4 –Alternative Locations**). The most recent Airport Master Plan has determined this parcel to be best suited for airport-compatible land uses that include, but would not be limited to, surface freight logistics, light industrial, commercial allied aviation services, and/or manufacturing.

5) Proposed Project

The Proposed Project is located in Parcels F and G, which is approximately 321 acres in size. It is in the western part of the Airport and east of Runway 18-36 and the eastern end of Runway 9-27 (**Attachment A: Figure 4 –Alternative Locations**). Parcel F was historically a pine plantation and Parcel G was historically fallow upland and pine plantation that was cleared and now is predominantly shrub with remnant trees and tree stumps. A wetland is located at the northern area of the parcel. The Proposed Project's construction limits stop short of the wetland thereby avoiding wetland impact (**Attachment A: Figure 3 – Conceptual Layout**). The site contains suitable habitat for gopher tortoises. The latest Airport Master Plan has identified this parcel as best suited for airport compatible commercial or utility development that would likely include commercial aircraft maintenance, repair and overhaul, air cargo freight and logistics, flight training, light industrial, solar power generation and/or manufacturing. The proposed solar farm site is located outside of the RPZ (**Attachment A: Figure 2 –Project Area**).

(2) Although the No Action alternative does not meet the purpose and need, NEPA, and it's implementing regulations requires consideration of the No Action alternative. The No Action alternative, when compared with other alternatives, enables the

identification of the potential environmental impacts of the Proposed Action and alternatives. Describe the consequences of the No Action alternative e.g. what are the operational, safety, efficiency, economic effects, and environmental effects of taking no action.

NO ACTION ALTERNATIVE

Under the ‘No Action’ alternative, the proposed construction of the Phase 2 solar power generation infrastructure at TLH would not be implemented. This alternative would not support the City’s strategy to reduce the City’s reliance on fossil fuels and reduce carbon emissions generated from electric power generation. Nor would the No Action alternative increase economic contribution from non-aviation uses on Airport property, support economic and sustainable development at the Airport, contribute to the Airport’s economic viability or help reduce the City of Tallahassee’s carbon footprint.

The No Action alternative does not meet the purpose of and need for the Proposed Project. However, in accordance with *NEPA; FAA Order 1050.1F, Environmental Impacts: Policies and Procedures*; and *FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions*, the EA retains the No Action alternative and discusses the environmental consequences of the Proposed Project and No Action alternative in comparative form.

(3) You must provide a summary table depicting the alternatives analysis that compares the Proposed Action, alternatives considered, and the No Action alternative based on the screening criteria discussed in (1) a. through d.

Provide summary table of alternative analysis

ALTERNATIVES ANALYSIS

None of the alternatives would be anticipated to have negative social or socioeconomic impacts because they would be constructed on airport property and would not cause relocations or impacts to minority or low-income communities. The absence of gopher tortoise was not used as a criterion because each alternative contains suitable habitat for the gopher tortoise. Therefore, the presence of gopher tortoise was not a differentiator among the alternatives.

For the purposes of this EA, the following screening criteria were developed to identify feasible and practical alternatives:

- 1) At least 300 acres of contiguous airport property suitable to accommodate the proposed solar energy infrastructure;
- 2) Construction would not result in wetland impacts;
- 3) Would comply with FAA airport design standards, including RPZ land use compatibility guidelines; and
- 4) Located where glare from the solar farm would be consistent with FAA guidance/policy.

Using these screening criteria, Alternatives A, B, C and D were eliminated from further analysis because they are less than 300 acres in size. More importantly, Alternatives A, B, C and D are not consistent with FAA guidance/policy with regards to glare because their locations would produce unacceptable glare that would obstruct air traffic control tower visibility and be a safety risk for pilots. Grouping Alternatives B, C, and D together would provide a total of 260 acres and would still not meet the 300-acre criteria. A comparison of the alternatives is also provided in **Table 2**.

The Proposed Project, the Airport Sponsor’s Preferred Alternative, was carried forward for detailed analysis because it can accommodate facility requirements for a 40 MWac solar farm, allows for siting outside of the RPZ and avoids glare hazards that obstruct the view from the ATCT and aircraft pilots using the Airport or operating aircraft within the air space surrounding the Airport. Although Alternative F/G contains wetlands, the wetlands are located outside the proposed construction area and the Proposed Action would not result in wetland impact.

Screening Criteria	Alternative					Proposed Project
	No Action	A	B	C	D	
Provides at least 300 acres of suitable contiguous airport property for development	No N/A	No 76 acres	No 27 acres	No 56 acres	No 161 acres	Yes 325 acres
Complies with FAA airport design standards, including RPZ land use compatibility guidelines	N/A	Yes	Yes	Yes	Yes	Yes
Construction can be completed with no wetland impacts.	N/A	Yes	Yes	Yes	No 10.79 acres	Yes
Located where glare from the solar farm would be consistent with FAA guidance/policy	Yes	-	-	-	-	Yes
<i>Retained for with Detailed Analysis in the EA</i>	Yes	No	No	No	No	Yes

LEGEND:
N/A = not applicable

7. AFFECTED ENVIRONMENT

Succinctly describe the existing conditions in the Proposed Action’s *direct impact area* (construction footprint) and airport vicinity (land use and cover, terrain features, level and type of urbanization, biotic resources, noise sensitive sites (residential, churches, schools, parks, recreational facilities, etc.)). This *indirect impact area* should be large enough to include the area within the composite DNL 65 dB noise contour for the Proposed Action and retained alternatives (if any). The discussion of the affected environment should be no longer than is necessary to understand the impacts of the alternatives; data and analyses should be presented in detail commensurate with the importance of the impact. Discuss any actions taken or issues raised by the local community or citizen groups pertinent to the Proposed Action. If not already provided, attach a graphic and recent aerial of the area with the Proposed Action’s and retained alternatives direct and indirect impact areas clearly identified.

Existing conditions in the Proposed Project direct impact area and airport vicinity are discussed in the following paragraphs in the order of categories listed in FAA Order 1050.1F. For the purposes of describing the Affected Environment and Environmental Consequences, the direct impact area includes the Solar Farm including the new electrical substation, the tap that will connect the substation to the local grid, and the access roads that will be improved to provide access during and after construction is completed. The direct impact area totals 315.2 acres in size (including the 307-acre solar farm and 8.2 acres of access road improvements).

Air Quality

The Airport is located in Leon County, which is designated as an Attainment Area for all National Ambient Air Quality Standards (NAAQS) criteria air pollutants.²

Biological Resources

Critical Habitat

Pursuant to the Endangered Species Act and for NEPA disclosure, information regarding federally listed species and their designated critical habitats that may be present in the Proposed Project was reviewed. Information obtained using the U.S. Fish and Wildlife Service (USFWS) critical habitat mapping tool³ indicated that no federally-designated critical habitats occur within and in the vicinity of the Proposed Project. Therefore, no further discussion of critical habitat is necessary.

Protected Species

The Florida Natural Areas Inventory (FNAI) tracking list for Leon County,⁴ the Leon County list of federally protected species from the USFWS Environmental Conservation

²EPA, “Green Book,” https://www3.epa.gov/airquality/greenbook/anayo_fl.html, accessed October 10, 2018.

³ USFWS, “ECOS Environmental Conservation Online System,” <http://ecos.fws.gov/ecp/report/table/critical-habitat.html>, August 8, 2018.

⁴ FNAI, “Tracking List,” <http://www.fnai.org/trackinglist.cfm>, March 2018 (August 8, 2018.).

online System (ECOS) website,⁵ and search generated from the USFWS ECOS Information for Planning and Consultation (IPaC) website⁶ for the direct impact area were utilized to identify federally-protected species that have been documented to occur within Leon County and in the vicinity of the Proposed Project. The federally-listed species for the County include four mussels [the purple bankclimber (*Elliptoideus sloatianus*), shiny-rayed pocketbook (*Lampsilis subangulata*), Ochlockonee moccasinshell (*Medionidus simpsonianus*), and oval pigtoe (*Pleurobema pyriforme*)], as well as the gulf sturgeon (*Acipenser oxyrinchus desotoi*), the West Indian manatee (*Trichechus manatus*), the wood stork (*Mycteria americana*), the piping plover (*Charadrius melodus*), and the American alligator (*Alligator mississippiensis*). Since there is no aquatic or shoreline habitat in the limits of the Proposed Project, there is no potential for impact to these protected species, and no additional evaluation of them is necessary. The remaining five federally-protected species (four listed under the Endangered Species Act and one protected under the Bald and Golden Eagle Protection Act) documented for Leon County and two additional species that are classified as candidates for federal listing under the Endangered Species Act are listed in **Table 3**.

FNAI documents a total of 28 plant species that either have a state legal status of “threatened” or “endangered” as occurring within Leon County. Of these 28 species, only four have habitat requirements that are similar to habitat in the Proposed Project. These four species are bent golden-aster (*Pityopsis flexuosa*), giant orchid (*Pteroglossaspis ecristata*), Flyr’s Brickell-bush (*Brickellia cordifolia*), and mock pennyroyal (*Stachydeoma graveolens*). FNAI also lists four state-protected reptiles (including Barbour’s map turtle and the alligator snapping turtle, which would not be found in the limits of the proposed project due to lack of suitable aquatic habitat). Of these state-protected reptiles, the gopher tortoise (*Gopherus polyphemus*) and the Florida pine snake (*Pituophis melanoleucus mugitus*) are either known to occur or could potentially occur within the limits of the Proposed Project. Excluding the federally-listed wood stork and red-cockaded woodpecker, FNAI lists four state-protected birds (three of which are wading birds or shorebirds that would not be present at the Solar Farm Area of Potential Effect (APE) due to lack of suitable aquatic habitat). The remaining state-protected bird, the southeastern American kestrel could use habitats in the limits of the Proposed Project. State-protected species identified by FNAI as occurring in Leon County that utilize habitats similar to those found in the Proposed Project are shown in **Table 3**.

A general environmental and protected species survey was conducted from May 7 through May 21, 2018. Additional survey during the bloom period for bent golden-aster was performed from August 27 through August 28, 2018. Supplemental survey was conducted along the access road improvement areas on October 30 and 31, 2018, during the fruiting period for bent golden aster. State-protected species observed during the field surveys include the gopher tortoise and bent golden aster. (**Attachment A: Figure**

⁵ USFWS, “Environmental Conservation Online System” <https://ecos.fws.gov/ecp/>, (August 8, 2018.)

⁶ USFWS, “IPAC Information for Planning and Consultation,” <https://ecos.fws.gov/ipac/>, August 8, 2018.

5 – Wetlands and Gopher Tortoise Burrows and Figures 6A and 6B – Bent Golden Aster Occurrences). No other state- or federally-protected species were observed during the surveys. The paragraphs below describe the potential for state- and federally-listed species to occur within the Proposed Project.

**Table 3
FEDERAL AND STATE PROTECTED SPECIES DOCUMENTED
FOR LEON COUNTY, FLORIDA**

Scientific Name	Common Name	Federal Status	State Status	Observed in Proposed Project
<i>Notophtalmus perstriatus</i>	Striped Newt	C	-	No
<i>Haliaeetus leucocephalus</i>	Bald Eagle	BGEPA	-	No
<i>Picoides borealis</i>	Red-cockaded Woodpecker	E	E	No
<i>Schwalbea americana</i>	American chaffseed	E	E	No
<i>Myotis grisescens</i>	Gray Bat	E	E	No
<i>Drymarchon corais couperi</i>	Eastern Indigo Snake	T	T	No
<i>Gopherus polyphemus</i>	Gopher Tortoise	C	ST	Yes
<i>Pituophis melanoleucus mugitus</i>	Florida Pine Snake	-	SSC	No
<i>Falco sparverius paulus</i>	Southeastern American Kestrel	-	ST	No
<i>Brickellia cordifolia</i>	Flyr’s Brickell-bush	-	SE	No
<i>Pityopsis flexouosa</i>	Bent Golden-aster -	-	SE	Yes
<i>Pteroglossaspis ecristata</i>	Giant Orchid -	-	ST	No
<i>Stachydeoma graveolens</i>	Mock Pennyroyal -	-	SE	No

Sources: USFWS, Ecological Conservation Online System, Federally Listed Species in Leon County, Florida, accessed August 8, 2018; USFWS Information for Conservation and Planning, accessed August 8, 2018; and FNAI tracking list for Leon County, accessed August 8, 2018.

Notes:

BGEPA = Protected under the federal Bald and Golden Eagle Protection Act; C = Candidate for federal listing under the Endangered Species Act; E = Listed as endangered under the Endangered Species Act; T = Listed as Threatened under the Endangered Species Act; SSC = classified as a species of special concern by the State of Florida; ST = classified as Threatened by the State of Florida; SE = classified as Endangered by the State of Florida;

Striped Newt

As a species that is considered a candidate for listing under the Endangered Species Act, the striped newt does not currently receive any statutory protection under the Endangered Species Act, and it also does not currently have any special protection status by the State of Florida. Striped newts spend most of their adult lives in xeric uplands including sandhills, scrub, and to a lesser extent, pine flatwoods. They breed in depression marshes or hammock ponds. The only marsh wetland habitat that may be suitable breeding habitat for this species near the Proposed Project is located approximately 1,350 feet south of the southwest corner of the Proposed Project. Based on a review of available historical aerial photography, this wetland does not appear to dry down completely, so it is likely to contain species of predatory fish that would render it unsuitable as breeding habitat for the striped newt. No evidence of striped newts was



observed during the field surveys (**Attachment A: Figure 5 – Wetlands and Gopher Tortoise Burrows**).

Bald Eagle

The bald eagle is a large bird of prey with brown plumage on its body and white plumage on its head and tail feathers. The bald eagle forages primarily on fish in open waters of rivers, estuaries, and lakes, but also marsh edges and tidal swamp. It nests in large trees in forested swamps, floodplain forests, pine forests, hardwood forests and in isolated trees near areas where it feeds. Most of the trees have been removed from the area of the Proposed Project and there is no suitable foraging habitat in close proximity to the project. The nearest documented bald eagle nest is approximately 3 miles southeast of the Proposed Project⁷. No bald eagles or bald eagle nests were observed during the survey.

Red-cockaded Woodpecker

The red-cockaded woodpecker nests and forages within pine dominated forests that have low to no understory of shrubs due to frequent fire events. With the exception of a 0.28-acre area at the northernmost end of the Proposed Project, the area containing the Proposed Project has been cleared of trees as part of TLH's Wildlife Hazard Management Plan (WHMP). The area that still contains trees does not contain mature pines and it is not managed to prevent growth of understory. No red-cockaded nest cavity trees were observed in this area. No suitable habitat for this species occurs within the limits of the Proposed Project.

American Chaffseed

American chaffseed typically occurs on moist to dry sandy soils, often in ecotonal areas between wetlands and drier uplands. It is typically found within pine flatwoods and pine savannas and is often in areas that experience frequent fire or that have fluctuating water tables that help to maintain open habitat conditions. The one extant documented occurrence of this species in Florida is on land in Leon County that is actively managed to remain in an open condition for quail by use of regular prescribed burns.⁸ The Proposed Project was formerly pine forest, but fire has been excluded from the area due to the proximity of the Airport and the visibility requirements of aircraft operations. The Proposed Project area was likely not suitable for chaffseed due to dense overgrowth of the understory prior to its being cleared in 2015. The Proposed Project area is also drier than the typical habitat types occupied by this species. No American chaffseed was observed during the field surveys.

⁷ FWC Bald Eagle Nest Locator Application

<https://public.myfwc.com/FWRI/EagleNests/nestlocator.aspx>, March 13, 2019

⁸ USFWS, "American Chaffseed Recovery Plan,"

<https://www.nrc.gov/docs/ML0719/ML071970329.pdf>, September 29, 1995 (January 3, 2019).



Gray Bat

The gray bat roosts in caves and feeds above waterways within wooded areas.⁹ No caves or surface waters occur within the Proposed Project. No evidence of the gray bat was observed during the field surveys.

Eastern Indigo Snake

Eastern indigo snakes occupy large home ranges where they utilize a variety of habitat types. They are often associated with gopher tortoises because they use gopher tortoise burrows as den sites. Suitable habitat for the eastern indigo snake is found within the Proposed Project. It is possible that indigo snakes utilize gopher tortoise burrows or other small cavities within Proposed Project or that the area of the Proposed Project is within the home range of one or more indigo snakes that may occasionally traverse the site, but no evidence of indigo snakes was found during the surveys.

Gopher Tortoise

Gopher tortoises utilize dry upland habitats including sandhills, scrub, xeric oak hammock, and dry pine flatwoods. A total of 53 potentially occupied burrows were found within the Proposed Project during the May 2018 gopher tortoise survey (**Attachment A, Figure 5, Wetlands and Gopher Tortoise Burrows**).

Florida Pine Snake

The Florida pine snake typically occurs in areas with open canopies and dry sandy soils such as sandhills, pastures and successional areas on former sandhills, pine scrub, and scrubby flatwoods.¹⁰ The Florida pine snake is known to utilize burrows of other species such as pocket gophers and gopher tortoises. Potential habitat for the Florida pine snake is present throughout the Proposed Project, but this species was not observed during the field surveys.

Southeastern American Kestrel

Southeastern American kestrels forage in open areas of pine habitat, along woodland edges, prairies, and pastures that have suitable standing dead timber or utility poles for nesting nearby.¹¹ Since the area of Proposed Project was cleared as part of the Airport's Wildlife Hazard Management Plan (WHMP), it represents suitable foraging habitat for kestrels. No kestrels were observed during the field surveys.

Flyr's Brickell-bush

This species typically occurs in sunny openings within dry upland woods of mixed pines and oaks, frequently those with southern red oak and loblolly pine. It is also reportedly

⁹ FNAI, "Gray Bat," http://www.fnai.org/FieldGuide/pdf/Myotis_grisescens.PDF, (September 17, 2018).

¹⁰ FNAI, "Florida Pine Snake," http://www.fnai.org/FieldGuide/pdf/Pituophis_melanoleucus_mugitus.pdf, (September 17, 2018).

¹¹ FNAI, "Southeastern American Kestrel," http://www.fnai.org/FieldGuide/pdf/Falco_sparverius_paulus.PDF, (September 17, 2018).



found on ravine slopes with overstories of spruce pine, live oak, and southern magnolia. Ravine slopes do not occur in the Proposed Project. Prior to clearing, habitat in the Proposed Project may have been similar to the dry mixed pine hardwood community described, but the overstory species composition was different (longleaf pine or slash pine instead of loblolly). Flyr's brickell-bush was not observed during the protected species surveys.

Bent Golden Aster

This species typically inhabits dry areas with sandy soil, and is usually in clearings within sand pine, slash pine, and/or longleaf pine habitat. This species was found in thirteen areas within the direct impact area of the Proposed Project as shown in **Attachment A: Figures 6A and 6B Bent Golden Aster Occurrences**), which depict the locations of the polygons containing bent golden aster and the approximate number of stems observed in each polygon.

Mock Pennyroyal

Mock pennyroyal occurs in sandhills and within drier areas in pine-palmetto-wiregrass flatwoods. Portions of the project area appear to provide suitable habitat for this species, but it was not observed during the general protected species surveys.

Giant Orchid

Giant orchid typically inhabits sandhill, scrub, pine flatwoods, and pine rockland habitats. It is dependent on fire events to maintain openings so that it can persist.¹² Since most of the Proposed Project was forested for over 20 years prior to its being cleared in 2015, and since fire has been suppressed on the area surrounding the airfield, this species is not likely to occur within the Proposed Project. It was not found during the general protected species surveys.

Migratory Birds

Based upon the results of the general environmental and protected species surveys that was conducted from May 7 through May 21, 2018, multiple abandoned nests were observed within shrubs in the Proposed Project's limits. The abundant shrubs and occasional live oak and laurel oak trees within the limits of the Proposed Project provide suitable nesting habitat for migratory birds that utilize such habitat for nesting. Open habitat that could be used by ground nesting birds is also available, but maintenance of the open areas may occur at a frequency that would limit nesting by such species.

Climate

The City of Tallahassee GreenPrint is a broad, non-regulatory strategic sustainability plan that was developed to help the City establish a roadmap to a more sustainable future. As part of GreenPrint, the City partnered with the University of Florida Institute of Food and Agricultural Sciences (IFAS) Climate Change Advisory Committee in 2013 and

¹² FNAI, "Giant Orchid," http://www.fnai.org/FieldGuide/pdf/Pteroglossaspis_e cristata.pdf, (September 17, 2018).



implemented a Hazard Mitigation Strategy for properties located in low lying areas that have the potential for flood damage in 2014. At this time, a formal Climate Adaptation Plan for the City of Tallahassee has not been developed. The City of Tallahassee has a progressive alternative energy program and the Airport's Sustainability Management Plan has identified increase in energy conservation as one its main goals. The City has already completed construction of a 20-megawatt solar farm at the Airport, which was phase 1 of the Airport Solar Project. The Proposed Project is phase 2 of the Airport Solar Project. Implementation of such solar projects has a positive impact on greenhouse gas emissions because they produce energy without burning fossil fuels.

Hazardous Materials, Solid Waste and Pollution Prevention

According to the results of the Phase I Environmental Site Assessment (ESA) that was conducted for the Proposed Project, no documented hazardous waste storage, disposal, generating, or spill sites occur within the limits of the Proposed Project^{13,14,15}. The property has a history of military use that may have included such activities as use as a firing range and other military training activities, but the investigators that prepared the report found no documentation or other evidence indicating that there were environmental contamination impacts resulting from this history of military use.

Offsite sources of contamination were determined to be unlikely to have any effect on the property that will be developed for the Proposed Project.

Historical, Architectural, Archeological, and Cultural Resources

Potential for historic and archaeological resources within the Area of Potential Effect (APE) for the Proposed Project was investigated in two separate Phase I Cultural Resources Assessment Surveys (CRAS).^{16,17} The APE represents the limits of construction for the Proposed Project (the direct impact area) and is the area that will be subject to alteration and disturbance of surface and subsurface soils that could directly or indirectly cause alterations in the character or use of historic or archaeological resources, if any such resources exist within the APE. The first CRAS, entitled Phase I Cultural Resource Investigations of the Tallahassee International Airport Solar Farm Project (2016 CRAS), was prepared in March 2016 for the 20 megawatt solar farm project that has

¹³ Environmental and Geotechnical Specialists, Inc. *Phase I Environmental Site Assessment for 40 Megawatt AC Solar Project at Tallahassee International Airport, Tallahassee, Florida. 2018*

¹⁴ Environmental Consulting and Technology, Inc, *Phase I Environmental Site Assessment for Solar PV Projects Tallahassee International Airport. March 2016.*

¹⁵ Environmental and Geotechnical Specialists, In. *Phase I Environmental Site Assessment for the Airport Unpaved Access Road for the FL 4 LLC Airport Solar Project 2, Tallahassee International Airport, Tallahassee, Florida. 2019*

¹⁶Search, *Phase I Cultural Resource Investigations of the Tallahassee International Airport Solar Farm Project, Leon County, Florida, March 2016.*

¹⁷ Achaеological Consultants, Inc, *Cultural Resource Assessment Survey of the City of Tallahassee Solar Farm 2 at Tallahassee International Airport, Leon County, Florida, July 2018.*



already been constructed at TLH. In addition to the area where the 20 megawatt solar farm (Solar Farm 1) was constructed, the 2016 CRAS evaluated large portions of the APE for the Proposed Project. The second CRAS, entitled Cultural Resource Assessment Survey of the City of Tallahassee Solar Farm 2 at Tallahassee International Airport (2018 CRAS) evaluated the remainder of the Proposed Project's APE. In addition, an addendum to the 2018 CRAS was prepared in December 2018 to evaluate potential presence of historic or archaeological resources in the area of the unpaved access road improvements.¹⁸

Each CRAS included a review of the Florida Master Site File (FMSF) documentation and a field survey. These studies found no archaeological sites or historic structures that are listed, determined eligible, or that appear eligible for listing on the NRHP within the APE for the Proposed Project.

Land Use

The existing land use within the Proposed Project is characterized by Tallahassee/Leon County GIS data as "Transportation/Communications/Utilities" and it is zoned as "Government Operational-2." The Government Operational-2 designation is assigned to districts that are zoned to provide for the operation and provision of services by local, state, and federal government; including, but not limited to, publicly owned commercial service airports. According to Northwest Florida Water Management District Florida Land Use, Cover and Forms Classification System (FLUCCS) data, the vegetation communities present within the boundary of the Proposed Project include (**Attachment A: Figure 7 – Existing Land Cover**):

- 2100-Cropland and pasture (58.10 acres)
- 3100-Herbaceous (dry prairie) (22.39 acres)
- 4340-Upland mixed-coniferous/hardwood (10.78 acres)
- 4410-Coniferous plantations (149.26 acres)
- 4430-Forest regeneration areas (72.87 acres)
- 8110-Airports (1.76 acres)
- 8140-Roads and highways (0.04 acre)

However, the 2015-2016 FLUCCS data was apparently collected prior to the removal of trees within the previously forested portions of the Proposed Project in 2015. The areas shown as upland mixed-coniferous/hardwood and all but 0.06 acre of the area shown as coniferous plantations has been clear-cut and is currently better described as forest regeneration areas.

The Proposed Project is bordered by the TLH airfield to the east and the Apalachicola National Forest to the north, south, and west.

¹⁸ Archaeological Consultants, Inc, Addendum Cultural Resource Assessment Survey Technical Memorandum, FI Solar 4 LLC/Tallahassee International Airport Solar Project 2, Leon County, Florida, December 2018.



Water Resources – Floodplains and Wetlands

According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer data, there is one area of 100-year floodplains at the northernmost end of the parcel that was leased for the Proposed Project, however this area of floodplains is outside of the limits of the Proposed Project (**Attachment A: Figure 8 – FEMA 100-Year Floodplains**)

A wetland delineation was performed within the limits of the Proposed Project in May of 2018. Although one wetland does occur at the northernmost end of the parcel that was leased for the Proposed Project, this wetland is north of, and outside of, the limits of the Proposed Project (**Attachment A: Figure 5 – Wetlands and Gopher Tortoise Burrows**).

8. ENVIRONMENTAL CONSEQUENCES –IMPACT CATEGORIES

Environmental impact categories that may be relevant to FAA actions are identified below in sections (1) through (14). Construction and secondary (induced) impacts should be addressed within the relevant environmental impact category. FAA-specific requirements for assessing impacts are highlighted in FAA Order 1050.1F, Appendix B *Federal Aviation Administration Requirements for Assessing Impacts Related to Noise and Noise-Compatible Land Use and Section 4(f) of the Department of Transportation Act (49 U.S.C. § 303)*. Methodologies for conducting the analyses are discussed in detail in the 1050.1F Desk Reference. The latest FAA-approved models must be used for both air quality and noise analysis. A list of approved models for each type of analysis is available in the 1050.1F Desk Reference.

Note: *The Desk Reference may be cited only as a reference for the methodologies and processes it contains, and may not be cited as the source of requirements under laws, regulations, Executive Orders, DOT or FAA directives, or other authorities. It further notes that you should cite the original source when citing requirements from laws, regulations, or other authorities.*

FAA Order 1050.1F, paragraph 4-3.3, Significance Thresholds and Exhibit 4-1, provide a significance determination table for the Proposed Action and retained alternatives (if any) based on the analysis in sections (1) through (14) below. Note: Quantitative significance thresholds do not exist for all impact categories; however, consistent with the CEQ Regulations, the FAA has identified factors that should be considered in evaluating the context and intensity of potential environmental impacts.

******IMPORTANT******

Environmental impacts for the following categories must be calculated for the year of project implementation and the planning horizon year in this EA Form. The implementation year represents the first year in which the Proposed Action would be fully operational. The planning horizon year typically represents the implementation year plus five years. Sometimes if appropriate due to project phasing or if requested by a reviewing agency, impact analysis may need to be conducted for intermediate years. Coordinate with an FAA ORL-ADO environmental specialist before conducting an intermediate year impact analysis.

Significance determination table



Not applicable. The Proposed Project is not anticipated to have significant impacts.

(1) AIR QUALITY

The FAA has a responsibility under NEPA to include in its EA’s sufficient analysis to disclose the extent of a project’s impact on the attainment and maintenance of the National Ambient Air Quality Standards (NAAQS) and any applicable state air quality standards. Thus, a project’s impact on air quality is assessed by evaluating whether it would cause a new violation of a NAAQS or contribute to a new violation in a manner that would increase the frequency or severity of the new violation. Very small projects sometimes can be evaluated qualitatively or by comparison to a previous project for which a quantitative air quality analysis is available. However, if a project requires the preparation of an EA, it is likely that a quantitative, project-specific air quality assessment would be needed. This can be accomplished by first identifying the emissions sources associated with a project, and then estimating the emissions for each retained alternative. Knowing the emissions may help to characterize a project’s impact for the EA. The FAA’s *Air Quality Handbook* provides information on how to conduct an air quality analysis.

https://www.faa.gov/regulations_policies/policy_guidance/envir_policy/airquality_handbook/

(a) Compared to the No Action alternative, will the Proposed Action or any of the retained alternatives cause or create a reasonably foreseeable increase in air emissions due to implementation? If the action will not cause a reasonably foreseeable emission increase, a *qualitative* air quality assessment is justifiable for disclosure purposes under NEPA. Provide an explanation of the conditions and rationale upon which this finding is based along with any supporting data, reasoning and/or justification. The assessment should explain how or why implementation of the Proposed Action or any of the retained alternatives will not cause or create a reasonably foreseeable increase in air emissions. **Note:** *Examples of projects and actions that will likely cause or create a reasonably foreseeable increase in emissions include those that will cause or create an increase in aircraft operations and/or ground access vehicle trips. Other projects such as runway/taxiway improvements, roadway modifications, and/or parking facility expansions, may cause or create reasonably foreseeable increases in emissions by changing aircraft and vehicle travel patterns. By comparison, examples of projects and actions that will not likely cause or create increases in emissions include land acquisition programs or the upgrading of airfield lighting systems.*

Discuss the potential for a reasonably foreseeable increase in air emissions:

Based on a review of data available on the U.S. Environmental Protection Agency website (https://www3.epa.gov/airquality/greenbook/anayo_fl.html), Leon County is classified as being in attainment with respect to all of the National Ambient Air Quality Standard criteria pollutants.

The Proposed Project is not anticipated to affect the type of aircraft or number of aircraft that utilize TLH. Furthermore, the Proposed Project is not anticipated to affect runway and taxiway utilization, flight tracks and their utilization, flight profiles, TLH’s fleet mix, Airport approach and departure procedures or aircraft idle time. The Proposed Project could potentially decrease emissions because it would supplement power generation from coal with clean power from solar. A temporary increase in air emissions is anticipated during construction. Compared to the No Action alternative, the Proposed Project will not impact air quality.



(b) Is the Proposed Action located in a nonattainment or maintenance area for any of the NAAQS established under the Clean Air Act? **If the Proposed Project is in a nonattainment or maintenance area, identify for what pollutant(s), and do not complete this EA Form without first contacting an ORL-ADO EPS for further guidance. Note:** To review the current list of areas designated nonattainment, see the U.S. Environmental Protection Agency reference book, *The Green Book Nonattainment Areas for Criteria Pollutants* at www.epa.gov/oaqps001/greenbk/.

Document area status:

No. The Proposed Project is located in an attainment area.

(c) If the action is located in an attainment area and will cause a reasonably foreseeable emission increase, you must prepare an emissions inventory for NAAQS priority pollutants and Green House Gases (GHG's) and disclose the results. **You must contact an ORL-ADO EPS before conducting an air quality analysis. Note:** As the *Aviation Emissions and Air Quality Handbook* explains, there are different types or components of an air quality analysis that can be undertaken depending on project/action type, the change(s) to the emission sources affected, and other relevant factors. There is no single, universal criterion for determining what type of analysis is appropriate for FAA-supported projects or actions. As an aid in selecting the appropriate air quality assessment methodology, see Figure 4-5 (*Air Quality Assessment Examples*) in the *Aviation Emissions and Air Quality Handbook*. Figure 4-5 identifies the types of air quality analyses (i.e., emissions inventory, dispersion modeling, etc.) that may be appropriate for FAA-supported projects and actions. Listed by project/action type, each assessment method is generally symbolized as High, Medium or Low in terms of the likely applicability of the analysis to the project/action type. Review the *Aviation Emissions and Air Quality Handbook* to understand how to prepare the analysis (including selecting the analysis years, identifying the emission types and emission sources of interest, obtaining and/or developing the necessary input data, and running the appropriate models and/or supplemental analyses.

****IMPORTANT****

As of May 29, 2015, the FAA accepted modeling tool for predicting air emissions is the Aviation Environmental Design Tool (AEDT). The most current version of this model, currently AEDT2b *must* be used for any new analysis started after that date. Please contact an ORL-ADO Environmental Specialist if you have any questions regarding the emissions analysis or the current version of the model to use in your analysis.

Provide the emissions inventory for the No Action Alternative, Proposed Action and Retained Alternatives for the EA Study Years including both direct and indirect emissions that are reasonably foreseeable which includes operational as well as construction emissions.

Not applicable.

Discuss the results of the emissions inventory and make a determination if the impacts are considered significant.

Not applicable.

(2) BIOLOGICAL RESOURCES (INCLUDING FISH, WILDLIFE, AND PLANTS)



(a) Using the Florida Land Use and Cover Classification System (FLUCCS), provide an assessment of the Proposed Action’s and retained alternatives (if any) direct impact area (construction footprint) and indirect impact area (area indirectly impacted through facility lighting, noise contours, air emissions, and changes to water quality or quantity caused by construction equipment or facility operations). Attach a figure and table (for direct and indirect impact areas) with acreages per land use cover type to assist in the explanation.

Quantitatively discuss potential direct and indirect impacts:

Table 4 provides a summary of the potential direct and indirect impacts to Florida land use cover designations within the limits of construction of the Proposed Project (**Attachment A: Figure 7 – Existing Land Cover**).

Table 4		
SUMMARY OF LAND COVER IMPACTS		
Land Cover Designation	FLUCCS Code	Direct Impact^a
Cropland and pasture	2100	58.10 acres
Herbaceous (dry prairie)	3100	22.39 acres
Upland mixed-coniferous/hardwood ^b	4340	10.78 acres
Coniferous plantations ^b	4410	149.26 acres
Forest regeneration areas ^c	4430	72.87 acres
Airports	8110	1.76 acres
Roads and highways	8140	0.04
TOTAL		315.2 acres
<p>LEGEND: ^aEstimated area calculated in GIS from Land Cover mapping ^bAlmost all of these areas have been cleared and are actually currently type 4430. One small 0.06-acre area of coniferous plantation remains forested within the 4410 polygon at the north end of the Proposed Project. ^c72.63 acres of these areas have been cleared and are correctly identified as 4430. The 4430 polygon at the northern end of the Proposed Project also contains a small 0.24-acre area that is actually forested coniferous plantation, 4410.</p>		

Direct Impact

The area within the limits of the Proposed Project will be cleared, grubbed and graded, so it is anticipated that the entire 315.2 acres would be directly impacted. A total of 123,700 First Solar 435-watt modules organized into arrays and linked into parallel strings. The modules will be mounted on fixed tilted racks with steel pile supports. No concrete footers will be utilized. Based on the conceptual design there would be 18 power conversion stations (PCS) distributed across the solar farm. Each PCS would be constructed on a concrete slab measuring approximately 12 feet by 25 feet. In addition, components of the power substation such as the control house, breaker, and transformer



would be constructed on concrete slabs. The construction of these impervious surfaces would be direct permanent impacts. Access road improvements will directly impact 8,256 linear feet of existing Airport internal unpaved roads that would be widened to 20 feet, thereby totaling 8.2 acres so this impact would have minimal effect to wildlife habitat. In addition, 11.7 acres of the Proposed Project area will be used for the construction of a new stormwater treatment pond (**Attachment A: Figure 3- Conceptual Layout**).

Indirect Impact

No indirect impacts have been identified for this resource. No impact from the digger derrick associated with pole installation is anticipated since the new poles for the tap would be installed in an existing utility easement that is regularly disturbed by maintenance equipment and vehicles.

(b) Describe the potential for the Proposed Action and retained alternatives (if any) to result in long-term or permanent loss of plant or wildlife species, to directly or indirectly affect plant communities, and/or involve the displacement of wildlife. Cross reference Category (14) Water Resources, if jurisdictional water bodies or wetlands are present.

Quantitatively discuss potential direct and indirect impacts:

The Proposed Project would not affect jurisdictional waterbodies or wetlands, therefore there are no anticipated impacts to surface water or wetland habitats (**Attachment A: Figure 5 – Wetlands and Gopher Tortoise Burrows**).

Much of the area within the limits of the Proposed Project, as previously described, was cleared in 2015 under the TLH wildlife hazard management program. This area is now a shrub-dominated community that totals approximately 251 acres. Approximately 0.3 acre of pine forest at the northern end of the Proposed Project were not cleared under the WHMP. The remaining 63.9 acres of the Proposed Project consists of herbaceous dominated communities that are occasionally mowed by TLH maintenance staff. All 315.2 acres will be cleared, graded, and developed for use as a solar farm. The area where the tap from the Proposed Project would be constructed to provide connectivity from the substation to the utility network is an existing electric utility easement that is regularly maintained to provide clear space and maintenance access for the overhead utility lines. The tap will be located within this easement near the southwest corner of the Proposed Project. Disturbance for the tap will consist of installation of three utility poles.

The shrub communities that will be impacted by the proposed project are typical for what would be expected following the clearing of a pine plantation. This is not a unique community type for this region. Similarly, the herbaceous communities that will be impacted are dominated by early successional species that are typical for fallow field



type sites that are disturbed frequently enough to prevent establishment of shrubs. Since the Proposed Project is bordered on three sides by the Apalachicola National Forest there is abundant wildlife habitat adjacent to the project (**Attachment A: Figure 7 - Existing Land Cover**). Gopher tortoises that will be displaced by the Proposed Project will be relocated to the Apalachicola National Forest Gopher Tortoise Research Site, which is a Florida Fish and Wildlife Conservation Commission (FFWCC)-approved site with long term protection and appropriate habitat for their continued survival.

(c) Using U.S. Fish and Wildlife (FWS) and National Marine Fisheries Service (NMFS) flora and fauna species lists for the Action vicinity, describe the potential for the Proposed Action and retained alternatives (if any) to directly or indirectly affect any federally-listed or candidate species of flora or fauna or designated critical habitat protected under the Endangered Species Act (ESA), the Marine Mammal Protection Act (MMPA), or affect Essential Fish Habitat (EFH) identified under the Magnuson-Stevens Act. You must attach records of consultation with FWS and NMFS, as appropriate, in an appendix to the EA. **Note:** *If the Proposed Action and retained alternatives (if any) would potentially affect federally protected or candidate species, or designated critical habitat, **do not complete this EA** and immediately contact an FAA ORL-ADO EPS.*

Quantitatively discuss the potential for the Proposed Action and retained alternatives to directly or indirectly impact federally-protected species and designated critical habitat:

As described previously, the Proposed Project does not contain wetlands, surface waters, or shoreline habitats so it does not contain suitable habitat for aquatic species and wetland dependent species including the federally protected mussels, the American alligator, the Gulf sturgeon, the West Indian manatee, the piping plover, and the wood stork. The project would have no effect on those species.

Suitable upland xeric habitat for the striped newt occurs within the Proposed Project, but no ephemeral depression marsh occurs in the proposed project. The only marsh wetland habitat that may be suitable breeding habitat for this species near the Proposed Project is located approximately 1,350 feet south of the southwest corner of the Proposed Project. Based on a review of available historical aerial photography, this wetland does not appear to dry down completely, so it is likely to contain species of predatory fish that would render it unsuitable as breeding habitat for the striped newt. No evidence of striped newts was observed during the field surveys. No effect to the striped newt would be anticipated as a result of the Proposed Project.

The bald eagle typically nests in large trees in areas near large bodies of water where they feed. Almost all of the trees have been removed from the Proposed Project as an airport wildlife hazard management measure. No suitable foraging habitat for the bald eagle is located in the immediate vicinity of the Proposed Project, and the nearest documented eagle nest is over 3 miles southeast of the project. The project would have no effect on the bald eagle

Red-cockaded woodpeckers require a habitat characterized by an overstory of mature pines with an understory that is clear of large shrubs and immature trees due to frequent fire or other disturbance. The Proposed Project does not contain this type of habitat and would have no effect to this species.



The Proposed Project does not contain any cave habitat or waterways and therefore does not contain roosting or foraging habitat for the gray bat. The construction within the Proposed Project would have no effect on this species.

Due to the fact that most of the area within the Proposed Project was forested for over 30 years prior to the implementation of the Airport's WHMP in 2015, which initiated the clearing of the wooded portions of the Proposed Project; and due to the fact that fire is suppressed on TLH property; the Proposed Project has not historically contained suitable habitat for American chaffseed due to closed canopy conditions and abundance of shrubby understory species. Therefore, it is unlikely that chaffseed would volunteer at the site now that it is more open. American chaffseed was not observed during the general protected species survey of the Proposed. The construction within the Proposed Project would have no effect to this plant species.

The Proposed Project does contain gopher tortoise burrows (**Attachment A: Figure 5- Wetlands and Gopher Tortoise Burrows**). Gopher tortoises east of the Mobile Bay, which includes Florida, is a candidate species eligible for Endangered Species Act protection. Because it is not a federally listed species, it receives no statutory protection under the Endangered Species Act. However, potential impacts to the gopher tortoise will be assessed and is discussed in the next section, the potential for the Proposed Action to directly or indirectly affect any state-listed species protected in the State of Florida.

The Proposed Project contains suitable habitat for the eastern indigo snake. To avoid and minimize impact to the eastern indigo snake, the construction contractor will be required to follow the USFWS "Standard Protection Measures for the Eastern Indigo Snake" throughout construction. Correspondence with the USFWS provides instruction that in the event that an eastern indigo snake is found in one of the gopher tortoise burrows, construction activities would stop and the USFWS would be notified. This procedure is also described in the eastern indigo snake standard protection measures. The USFWS has been provided a copy of the Draft EA. Additionally, the updated Eastern Indigo Snake Programmatic Effect Determination Key was reviewed for the Proposed Project and a copy of the results is contained in **Attachment D2**. As described in the key, the Proposed Project will impact more than 25 active gopher tortoise burrows. All active and inactive gopher tortoise burrows will be evacuated prior to the commencement of construction activity. If an indigo snake is encountered during gopher tortoise evacuation work, the snake will be allowed to vacate the area before gopher tortoise burrow evacuation activities can resume. Holes, cavities, and snake refugia other than gopher tortoise burrows will be inspected each morning before planned work of a particular area, and, if occupied by an indigo snake, work will stop and will not commence until the snake has vacated the vicinity of proposed work area. The Proposed Project may affect, not likely to adversely affect the eastern indigo snake.



Critical Habitat

As described in the Affected Environment section, no federally designated Critical Habitats for listed species are located in or near the area to be impacted by Proposed Action.

(d) Using Florida Fish and Wildlife Commission (FWC) flora and fauna species lists for the Action vicinity, describe the potential for the Proposed Action and retained alternatives (if any) to directly or indirectly affect any state-listed species protected in the State of Florida. You must attach records of consultation with state jurisdictional agencies such as the FWC and Florida Department of Environmental Protection (DEP), as appropriate, in an appendix to the EA.

Quantitatively discuss the potential for the Proposed Action and retained alternatives to directly or indirectly impact state-protected species and designated critical habitat:

State Protected Species

Potentially occupied gopher tortoise burrows occur within the limits of the Proposed Project (**Attachment A: Figure 5 – Wetlands and Gopher Tortoise Burrows**). To minimize unavoidable impact to the gopher tortoise and their habitat, a gopher tortoise survey will be conducted within 100 percent of the suitable habitat within the limits of the Proposed Project, approximately 90 days prior to construction. A Gopher Tortoise Conservation Permit will be applied for, burrows will be excavated and tortoises that are recovered will be relocated to the Apalachicola National Forest Gopher Tortoise Research Site per the conditions of the permit. Other commensal species captured as a result of gopher tortoise burrow excavation and relocation efforts will be released within suitable habitat on TLH property outside of the limits of the Proposed Project. Prior to construction, potentially occupied gopher tortoise burrows will be excavated, and gopher tortoise found will be relocated to the Apalachicola National Forest Gopher Tortoise Research Center, which is an FFWCC-approved recipient site. Shortly after, silt fence will be installed around the perimeter of the site with at least the lower eight inches of the fence buried to prevent gopher tortoises from wandering onto the Proposed Project site.

The Florida pine snake is a gopher tortoise burrow commensal that could also potentially utilize habitats within the limits of the Proposed Project. Commensals that are found as part of gopher tortoise relocation efforts would be relocated to an adjacent area on TLH property outside of the Proposed Project. No significant effects to the Florida pine snake are anticipated.

No other state-protected animal species that occur on the FNAI list for Leon County would be affected by the construction within the Proposed Project.

One state-listed plant species, bent golden aster, was found in 15 locations within the limits of the Proposed Project. Regarding state protected plant species, the Florida Department of Agriculture and Consumer Services (FDACS) regulates the harvest of protected plant species for commercial purposes but does not restrict landowners from destruction of listed plants on their own property. "The clearing or removal of regulated plants from a canal, ditch, survey line, building site, or road or other right-of-way by the



landowner or his or her agent” is exempt from Florida’s endangered and threatened native plant protection regulations per 581.185(8)(b) F.S. Therefore, state regulations for protection of state-listed plants are not a constraint to development. No mitigation is required for unavoidable impact to state protected species.

The City of Tallahassee has additional regulations that apply to conservation of state-listed plants. A City of Tallahassee Natural Features Inventory and an Environmental Impact Assessment has been submitted to the City of Tallahassee Growth Management Department for approval. As mitigation for the unavoidable impacts to the bent golden aster, approximately 71 stems of bent golden aster would be relocated to a 3.95-acre grass buffer located along the western border of the Proposed Project next to the Apalachicola National Forest. Construction will not commence until an Environmental Management Permit has been obtained from the City of Tallahassee.

FWC Coordination

A copy of the initial coordination with FWC and FWC’s concurrence letter that the Proposed Project is not anticipated to have direct impacts to threatened species is contained in **Attachment D3 – State Agency Correspondence**. Further coordination with FWC will be conducted as part of the Florida Department of Environmental Protection (FDEP) Environmental Resource Permit (ERP) process and to apply for and secure a Gopher Tortoise Relocation Permit for the Proposed Project.

Critical Habitat

There is no federally-designated critical habitat within the limits of the Proposed Project.

(e) Describe the potential for the Proposed Action and retained alternatives (if any) to directly or indirectly affect species protected under the Migratory Bird Act. You must attach a record of consultation with FWS in an appendix to the EA.

Quantitatively discuss the potential impacts:

The Proposed Project contains 63.9 acres of primarily herbaceous habitat that is occasionally mowed by maintenance staff. Due to maintenance activities this portion of the Proposed Project, it somewhat less suited to migratory birds. The remainder of the area in the Proposed Project is dominated by shrub habitat. This habitat is suitable for use as nesting habitat by migratory birds such as the gray catbird, mockingbirds, brown thrashers, cardinals and other migratory bird species that build nests in shrubby vegetation¹⁹The primary nesting season for migratory birds varies greatly among species and geographic locations, but generally extends from early April to mid-July. However, the maximum period for the migratory bird nesting season can extend from early January through August. In Tallahassee, migratory birds typically migrate in the spring and fall season because Tallahassee lies directly along the Atlantic Flyway, a migration route that

¹⁹ The Cornell Lab of Ornithology Birds of North America, <https://birdsna.org/Species-Account/bna/home> (March 15, 2019)



begins in the Caribbean and follows the Atlantic Coast between the Straits of Florida and the Gulf of Mexico, to the eastern Arctic and Greenland.

To avoid and minimize potential impact to migratory bird species, bird nests that are observed during the 100 percent gopher tortoise survey that will take place prior to construction, will be flagged. Nests with eggs or hatchling will be relocated to the nearest wildlife rehabilitation center. Although this may result in loss of some eggs, no birds will be taken during construction of the Proposed Project. FWS is being provided a copy of the Draft EA. (**Attachment D2 – Federal Agency Correspondence**).

Once the Proposed Project is constructed, the tap for the Proposed Project will be integrated into the City of Tallahassee’s Migratory Bird Management Plan (**Attachment F**). Occasionally nests may have to be removed, but this would be done in accordance with the plan and would be reported to the FFWCC. No significant migratory bird impacts are anticipated.

(f) Discuss any operational, avoidance, minimization or mitigation measures (including construction mitigation measures) that have been considered in the siting of the Proposed Action and retained alternatives (if any) to mitigate impacts to biological resources. Identify all required federal, state or local permits. **Note:** *Analyses for undisturbed areas including water bodies must be conducted in consultation with FWS, other Federal agencies (NMFS, EPA, USACE), and state agencies (DEP, FWC, and water management districts), having expertise on potentially affected biotic resources and their habitats. Federal and state-listed species lists must be consulted and the potential for occurrence in the Proposed Action area must be documented. Include an analysis of construction impacts and measures to avoid and minimize impacts to ensure that this document properly addresses both permanent and temporary, constructed-related impacts on these resources.*

Quantitatively discuss any operational, avoidance, minimization or mitigation measures:

As discussed in the alternative’s analysis, no other reasonable alternative was available except for the Proposed Project.

Minimization of Other Construction Impact

During construction, in order to minimize temporary impacts to air quality, noise, and water quality that can occur as a result of land disturbance and operation of heavy equipment, measures specified in FAA AC 150/5370-10G, *Standards for Specifying Construction of Airports* will be implemented. Additionally, erosion and sediment control measures will be incorporated in the permit plans as required by the FDEP ERP and a construction Stormwater Pollution Prevention Plan (SWPPP) will be prepared and implemented as required for the National Pollutant Discharge Elimination System (NPDES) permit for Large Construction Activities.



(3) CLIMATE

(a) Affected Environment - For airport actions, the study area is defined by the extent of the project changes (i.e., immediate vicinity of the airport) and should reflect the full extent of aircraft movements as part of the project changes. Consult the FAA’s Air Quality Handbook for more information on defining the study area. As explained in the 1050.1F Desk Reference, analysis of GHG emissions should be quantitatively assessed in certain circumstances, but otherwise may be qualitatively assessed. Where the analysis is quantitative, the affected environment section for climate should provide the quantitative data for the existing condition, which provides the baseline of existing GHG emissions in the study area. The affected environment section should also discuss the current level of preparedness in the study area with respect to the impacts of climate change. This involves describing current measures that are in place within the study area to adapt to the impacts of climate change (e.g., sea level rise, stronger or more frequent storms, etc.). This discussion should be concise and may be quantitative or qualitative, depending on the nature of the project area.

Describe the current Climate and level of preparedness conditions in the Study Area:

Climate
TLH lies within the central portion of the Florida panhandle at an elevation of approximately 82 feet above mean sea level. The City of Tallahassee has a warm humid temperate climate with hot summers and no dry season. The average temperature throughout the year is 68°F with an average high of 80°F and a low of 56°F.²⁰ The warm season is between May and September with average daily high temperature above 86°F. The cold season is between December and February with an average daily high temperature below 68°F. Precipitation varies throughout the year, but the wettest season is from June 1 through September 11.²¹

TLH and the Proposed Project are located between 40 and 120 above mean sea level and no portion of the Proposed Project is within a 100-year floodplain. The Proposed Project will be constructed to meet current building codes to address wind shear and changes in weather patterns from climate resiliency. The City is currently developing a Community Resilience Plan.²²

(b) Environmental Consequences - If GHG’s and climate are not relevant to the Proposed Action and alternative(s) (i.e., because there would be no GHG emissions), this should be briefly noted and no further analysis is required.

Qualitatively discuss the reasons that the Proposed Action and retained alternatives would not affect GHG’s or Climate Change:

²⁰ U.S. Climate Data, “Climate Tallahassee-Florida” <http://www.usclimatedata.com/climate/tallahassee/florida/united-states/usfl0479> (October 17, 2018).

²¹ Weather Spark, “Average Weather in Tallahassee,” <https://weatherspark.com/y/15552/Average-Weather-in-Tallahassee-Florida-United-States-Year-Round>, (October 17, 2018).

²² City of Tallahassee Resiliency Plan <https://www.talgov.com/publicsafety/resplan.aspx> . (March 13, 2019).



The Proposed Project supports the City’s goal to diversify the fuel supply, reduce reliance on fossil fuels and reduce carbon emissions generated with electric power generation, thus reducing GHG’s. As such, the Proposed Project would have a positive effect on GHG and climate change impacts.

(c) Where the Proposed Action or alternative(s) *would not* result in a net increase in GHG emissions (as indicated by quantitative data or proxy measures such as reduction in fuel burn, delay, or flight operations), a brief statement describing the factual basis for this conclusion is sufficient and no further analysis is required.

Describe the basis for “no-effect” conclusion:

The Proposed Project would not result in a net increase in Airport related GHG emissions because it will not affect the number of operations, fleet mix, runway use, taxiing times, flight patterns or approach and departure procedures at TLH. The Proposed Project will reduce GHG emissions to the extent that it replaces electric power generation from other sources. A temporary minor increase in GHG emissions is anticipated during construction. A minor increase in emissions is anticipated from vehicles during security patrols and maintenance events.

(d) Where the Proposed Action or alternative(s) *would* result in an increase in GHG emissions as *compared* to the No Action alternative for the same study year, the emissions should be assessed either qualitatively or quantitatively using the methodology described in FAA’s 1050.1F Desk Reference, Section 3.3.2 (Data Analysis). **Note:** Contact an ORL-ADO EPS prior to undertaking a quantitative analysis.

Explain

A temporary minor increase in GHG emissions is anticipated during construction. A minor increase in emissions is anticipated from vehicles during security patrols and maintenance events.

(e) Documentation - When CO2e is quantified, the metric tonnes (MT) CO2e results should be provided in a table or similar format that compares the alternatives directly. When fuel burn is computed, the MT CO2 equal to that fuel content should be documented and discussed. See Section 3.3.3 of 1050.1F. **Note:** *There are no significance thresholds for aviation or commercial space launch GHG emissions, nor has the FAA identified specific factors to consider in making a significance determination for GHG emissions. There are currently no accepted methods of determining significance applicable to aviation or commercial space launch projects given the small percentage of emissions they contribute. CEQ has noted that “it is not currently useful for the NEPA analysis to attempt to link specific climatological changes, or the environmental impacts thereof, to the particular project or emissions, as such direct linkage is difficult to isolate and to understand.” Accordingly, it is not useful to attempt to determine the significance of such impacts. There is a considerable amount of ongoing scientific research to improve understanding of global climate change and FAA guidance will evolve as the science matures or if new Federal requirements are established.*

Provide a discussion of the analysis including data tables comparing the No Action and retained alternatives for each study year:

Minor GHG emissions were not calculated.



(f) Reducing Emissions - Reduction of GHG emissions resulting from FAA actions contributes towards the U.S. goal of reducing aviation’s impacts on climate. For NEPA reviews of proposed FAA actions that would result in increased emissions of GHGs, consideration should be given to whether there are areas within the scope of a project where such emissions could be reduced. GHG emission reduction can come from measures such as changes to more fuel efficient equipment, delay reductions, use of renewable fuels, and operational changes (e.g., performance-based navigation procedures). However, GHG emission reduction is not mandated and will not be possible in all situations.

Discuss measures to reduce emissions associated with the Proposed Action:

The Proposed Project is anticipated to generate up to 55 MW dc or 42 MWac to the City’s electrical grid which would then reduce the City’s reliance on fossil fuels and reduce GHG emissions. According to Solar Mango’s CO2 emission reduction with solar calculator, a 42 MWac solar farm would have a CO2 emission reduction of 45,990 tons per year.²³

(g) Climate Adaptation - The environmental consequences section should include a discussion of the extent to which the proposed action or alternatives(s) could be affected by future climate conditions, based on published sources applicable to the study area. For example, a project area’s ability to sustain impacts caused by climate changes should be described (e.g., identify current robustness and height of seawalls for coastal airports). This discussion should include any considerations to adapt to forecasted climate change conditions.

Discuss potential climate conditions relevant to the Proposed Action:

A change in climate conditions that increases precipitation and results in less sunny days would reduce the Proposed Project’s ability to generate up to 42 MWac to supplement the City’s electric power needs.

(4) COASTAL RESOURCES

(a) Is the Proposed Action located within the Coastal Barrier Resources System (CBRS), as delineated by the U.S. Fish and Wildlife Service (FWS) Official CBRS maps? If the Proposed Action is located within the CBRS, **do not complete this EA** and immediately contact an FAA ORL-ADO EPS.

Explain:

No, the Proposed Project is not located within the Coastal Barrier Resource System (CBRS). The nearest element of the CBRS is located over 20 miles south of the Proposed Project.²⁴

(b) The Florida Department of Environmental Protection (DEP), Florida State Clearinghouse, Office of Intergovernmental Programs, will coordinate a consistency review of the Proposed Action under the following authorities: Presidential Executive Order 12372; § 403.061 (42), Florida Statutes; the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended; and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4347, as amended. The ORL-

²³ Solar Mango CO2 Emission Reduction with Solar Calculator, <http://www.solarmango.com/in/tools/co2-emission-reduction-results/> (March 15, 2019)

²⁴ USFWS, “Coastal Barrier Resources System Mapper,” <https://www.fws.gov/CBRA/Maps/Mapper.html> , (October 15, 2018).



ADO EPS must review the Draft EA prior to submittal to the Clearinghouse for consistency review. The Airport Sponsor then submits the Draft EA to the Clearinghouse. Contact the Clearinghouse (850-245-2161) for the required number of copies and format. The Clearinghouse will make a determination of the Proposed Action’s consistency with Florida’s Coastal Management Program (FCMP) based on information contained in the Draft EA. **Note:** *The FCMP consistency review process normally takes 30 to 45 days and is conducted during the public and agency review of the Draft EA. The Clearinghouse will send a consistency determination letter with state comments to the Airport Sponsor. The Airport Sponsor must include a copy of the consistency letter and the Airport Sponsor’s responses to any comments received from state agencies in an appendix to the Final EA submitted to the FAA ORL-ADO.*

Ensure that the Proposed Action is consistent with the enforceable policies of the FCMP (<http://www.dep.state.fl.us/cmp/federal/>). Acknowledge submittal of the Draft EA to the Clearinghouse for review.

A copy of this Draft EA was submitted to the Florida State Clearinghouse (FSC) for review on March 22, 2019. A copy of the FCMP consistency letter from FSC, dated May 6, 2019, and other FSC correspondence is included in the Final EA in **Attachment D3 – State Agency Correspondence**.

(5) DOT SECTION 4(f)

(a) Describe and identify on an attached figure all DOT Section 4(f) resources both on-airport and within the airport’s vicinity (or area encompassed by the composite DNL 65 dBA noise contour for the Proposed Action, reasonable alternatives (if any) and No Action alternative). Resources that are protected by Section 4(f) are publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance; and publicly or privately-owned land from an historic site of national, state, or local significance. Cross-reference Category (11) Noise and Compatible Land Use, as applicable.

Describe 4(f) resources and attach a figure if applicable:

No Section 4(f) resources are located within the Proposed Project site. The Apalachicola National Forest is located north, south, and west of the Proposed Project (**Attachment A; Figure 2 – Project Area**). It is the largest U.S. National Forest in the State of Florida and consists of 632,890 acres. Within the forest are recreational areas for hiking, camping, and horseback riding but none of these recreational areas are near TLH or the Proposed Project. Although portions of the National Forest have recreational use that would qualify as Section 4(f) resources, the National Forest land adjacent to TLH and the Proposed Project does not have, and is not managed for, recreational use. Therefore, the Proposed Project would not directly or indirectly affect Section 4(f) resources.

The Proposed Project would be constructed on Airport property and the tap connecting the Proposed Project to the grid would be constructed within easements held by the Utility. The Proposed Project will not affect TLH operations or fleet mix and therefore, compared to the No Action alternative, will not affect aircraft noise.

(b) Compared to the No Action alternative, would the Proposed Action and retained alternatives (if any) have a direct impact (physical use or “taking”) or indirect impact (constructive use) on any of any Section 4(f) sites or facilities? To assess constructive use refer



to "FAR Part 150, Appendix "A", Table 1, Land Use Compatibility With Yearly Day-Night Average Sound Levels" If **YES, do not complete this EA** and contact the FAA ORL-ADO EPS.

Discuss the results of the analysis:

The Proposed Project would have no direct (taking) or indirect (constructive use) impact on any Section 4(f) properties. The Proposed Project is located on TLH property and will not affect airport noise. No indirect impacts to Section 4(f) resources are anticipated.

(6) FARMLANDS--PRIME, UNIQUE OR STATE-SIGNIFICANT FARMLAND

(a) Compared to the No Action alternative does the Proposed Action and retained alternatives (if any) involve the acquisition of Prime, Unique or statewide and locally important farmland, or the conversion/use of these types of farmlands that are protected by the Federal Farmland Protection Policy Act (FPPA)? Contact the Florida Natural Resources Conservation Service (NRCS). For more information see: <http://www.nrcs.usda.gov/wps/portal/nrcs/main/fl/soils/>

If appropriate, attach record of coordination with the Florida NRCS, including a completed Form AD-1006. **Note:** *Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land, but not land used for water storage or urban built-up land. Also, the "Part 523-Farmland Protection Policy Manual" notes that lands identified as "urbanized area" (UA) on Census Bureau maps are not subject to the provisions of the FPPA. See <https://www.census.gov/geo/maps-data/maps/2010ua.html> for Census Bureau maps.*

Discuss analysis and add tables and graphics as appropriate:

According to the National Resource Conservation Service (NRCS) Web Soil Survey,²⁵ soils within the Proposed Project include four map unit types: Chipley fine sand, 0 to 2 percent slopes (8.9 acres); Kershaw sand, 0 to 5 percent slopes (193.5 acres); Kershaw sand, 5 to 8 percent slopes (108.5 acres); and Ortega sand, 0 to 5 percent slopes (4.3 acres, **Attachment A: Figure 9 – Soils Map**). All of these soils are rated as "not prime farmland" by the NRCS. The Farmland Conversion Impact Rating Form, AD 1006, is used to determine farmland impact. Since there are no prime, unique, or state important farmland soils, the form states that the FPPA does not apply. The Proposed Project would have no impact on farmlands as defined and protected under the Farmland Protection Policy Act. A copy of the NRCS determination letter is provided in **Attachment D2**.

(7) HAZARDOUS MATERIALS, SOLID WASTE, AND POLLUTION PREVENTION

(a) Compared to the No Action alternative, would the Proposed Action and reasonable alternatives (if any) violate applicable Federal, state, tribal or local laws or regulations regarding hazardous materials and/or solid waste management?

Explain:

No, the Proposed Project would not violate applicable Federal, state, tribal or local laws or regulations regarding hazardous materials and/or solid waste management.

²⁵ USDA, NRCS, "Web Soil Survey," <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>, (October 15, 2018).



(b) Compared to the No Action alternative, would the Proposed Action and retained alternatives (if any) involve a contaminated site (including but not limited to a site listed on the National Priorities List)? Describe how the Proposed Action site was evaluated for hazardous substance contamination. Reference electronic database searches and attach in an appendix any record of consultation with appropriate expertise agencies (e.g., US Environmental Protection Agency (EPA), Florida DEP).

Explain:

No, the Proposed Project will not involve use of any contaminated site. A Phase I ESA, including a limited field survey and regulatory records review, was conducted to evaluate the area within the limits of the Proposed Project for hazardous substance contamination. No contaminated sites were identified within the limits of the Proposed Project.

(c) Compared to the No Action alternative would the Proposed Action and retained alternatives (if any) produce an appreciably different quantity or type of hazardous waste?

Explain:

No, the Proposed Project compared to the No Action alternative would not produce an appreciably different quantity or type of hazardous waste compared to other alternatives. The solar transformers contain oil which is used for insulation. The Utility has trained personnel that tests the oil and if all test well, the oil may be replaced every 15 to 20 years. Oil is handled and disposed of according to current oil disposal regulations. The transformers are installed on concrete pads that serve as secondary containment.²⁶

(d) Compared to the No Action alternative, would the Proposed Action and retained alternatives (if any) generate an appreciably different quantity or type of solid waste or use a different method of collection or disposal and/or would exceed local capacity? If **YES**, are local disposal facilities capable of handling the additional volumes of solid waste resulting from the Action? A letter from the local waste management handling facility may be necessary.

Explain:

No, the Proposed Project compared to the No Action alternative would not generate an appreciably different quantity or type of solid waste or use a different method of collection or disposal and would not exceed local capacity. Construction of the Proposed Project would result in typical construction debris that would be transported to the nearest construction and demolition debris landfill which is located 5.5 miles northwest of the Airport and the Proposed Project. Hazardous materials such as gasoline and diesel would be used in construction equipment. However, spill prevention control and countermeasures would be implemented to prevent and contain hazardous materials spills during construction. No impact to local waste management handling facilities is anticipated during the construction of the Proposed Project. Once the facility is constructed it would not generate solid waste.

²⁶ Blue Oak Energy Distribution and Substation Transformers for Utility Solar Power Generation Facilities, <https://www.blueoakenergy.com/blog/distribution-and-substation-transformers-for-utility-solar-p> (March 15, 2019)



(e) Compared to the No Action alternative, would the Proposed Action and retained alternatives (if any) adversely affect human health and the environment with regards to hazardous materials or solid waste?

Explain:

No, the Proposed Project compared to the No Action alternative is not anticipated to adversely affect human health and the environment with regards to hazardous materials or solid waste. During the functional lifespan of the solar panels, the Proposed Project is not anticipated to generate hazardous materials or waste. The structural components of the Proposed Project would eventually need to be replaced over time as part of maintenance or during decommissioning. At such time, the waste that would be generated would be disposed of or recycled based upon disposal regulations in effect and available recycling options at the time of decommissioning.

(f) Is there a sanitary landfill containing municipal solid waste (MSW) located within 10,000 feet of a runway serving turbo-powered aircraft, or 5,000 feet of a runway serving piston-powered aircraft? **Note:** A sanitary landfill containing municipal solid waste (MSW) is incompatible with airport operations if the landfill is located within 10,000 feet of a runway serving turbo-powered aircraft, or 5,000 feet of a runway serving piston-powered aircraft. Refer to FAA Advisory Circular 150/5200.33 " Hazardous Wildlife Attractants on or Near Airports," and FAA Order 5200.5B, "Guidance Concerning Sanitary Landfills on or Near Airports."

Explain:

There are no sanitary landfills containing municipal solid waste located within 10,000 feet of any TLH runways serving turbine powered aircraft. The nearest solid waste facility or landfill is located approximately 5.5 miles from TLH and the Proposed Project.

(8) HISTORICAL, ARCHITECTURAL, ARCHEOLOGICAL, AND CULTURAL RESOURCES

(a) Describe and identify on an attached figure any known sites listed-in or eligible for listing on the National Register of Historic Places (NRHP) within the Proposed Action’s and retained alternatives (if any) Area of Potential Effect (APE), which is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties”. The APE includes the direct impact area (limits of ground disturbance) and as applicable the indirect impact area encompassed by the composite DNL 65 dBA noise contour of the Proposed Action, No Action, and retained alternatives (if any). Protected resources include historic sites, districts, objects, archaeological remains, historic structures, public parks, publicly-owned recreation areas, and wildlife or waterfowl refuges. Accomplish this review through searching the NRHP database, consultation with the Florida State Historic Preservation Officer (SHPO), local historic groups, local jurisdictions, federally recognized tribes in the State of Florida, and airport staff. Historic airport facilities (50 years or older) must be included. **Note:** If any known listed or eligible NRHP sites are identified within the Proposed Action’s APE (direct or indirect), you must immediately contact the ORL/ADO Environmental Specialist for further instruction regarding Section 106 of the National Historic Preservation Act (NHPA).

Describe and identify on attached figure (as applicable) any known sites in the direct and indirect impacts APE:



Retained alternatives are limited to the Proposed Project and the No Action Alternative. The APE for cultural and historical resources was defined as the limits of construction of the Proposed Project. As described in the Affected Environment, Item 7, the APE was evaluated for potential occurrence of historic, architectural, archaeological, and cultural resources during two separate Phase I CRAS Reports and an addendum which together provide complete coverage of the limits of the APE. The CRAS reports found that there are no NRHP-listed, eligible, or potentially eligible resources within the APE, and the Florida Department of State, Division of Historical Resources concurred with these findings (**Attachment D3** – State Agency Correspondence).

(b) Consultation with the SHPO and tribes should be conducted early in the process and prior to submittal of the preliminary Draft EA to the ORL/ADO EPS. Discuss Florida SHPO and tribal consultation responses below. **Records of consultation with the Florida SHPO and federally recognized tribes and their responses must be included in an appendix to the EA.** All public out-reach efforts should apply to these groups as well. **Note:** *Letters to the Florida SHPO and federally recognized tribes must come from the FAA. Draft letters for FAA signature. Discuss the proposed action and attach a figure identifying the area of potential effect (APE) on a recent aerial. Include in the discussion whether a cultural resource assessment study (CRAS) has been done for the APE. Provide a written effects determination along with supporting documentation to the SHPO/THPO and the consulting parties (see 36 CFR § 800.5). Make one of the following conclusions: (1) no historic properties present in the APE; (2) no adverse effect on historic properties; or (3) adverse effect on historic properties. You must review <http://www.dot.state.fl.us> for a list of federally recognized tribes, contacts and addresses. If any known listed or eligible NRHP sites are identified within the Proposed Action’s APE, you must immediately contact the ORL/ADO Environmental Specialist for further instruction regarding Section 106 of the National Historic Preservation Act (NHPA).*

Discuss Florida SHPO and tribal consultation responses.

SHPO Consultation

A letter was sent to the SHPO on July 13, 2018, with a copy of the results of the 2018 Phase I Cultural Resource Assessment Survey (CRAS). The SHPO already had a copy of the 2016 CRAS and had previously indicated concurrence with its findings on April 8, 2016, so they did not require an additional copy of it. A response from the SHPO indicating concurrence with the conclusions of the 2018 CRAS was provided on July 30, 2018. The July 30, 2018, letter also stated that the SHPO found that the Proposed Project would have no effect on historic properties listed, or eligible for listing in, the NRHP. Copies of the correspondence with the SHPO are contained in **Attachment D3**. The addendum to the 2018 CRAS that evaluated cultural resources for the access road improvements was provided to the SHPO on February 22, 2019.

Tribal Consultation

Consultation letters were sent by the FAA to the six federally recognized Indian tribes affiliated with Florida projects on March 11, 2019. Copies of tribal consultation letters are contained in **Attachment E**.

Only two Indian tribes responded. The Muscogee (Creek) Nation responded on March 19, 2019 and had no objections to the Proposed Project and requested that they be updated



should cultural material or human remains be encountered during construction. The Seminole Tribe of Florida responded on April 5, 2019 and had no objections to the Proposed Project. Similar to the Muscogee (Creek) Nation, they requested an update should archeological, historical or cultural resources be discovered during construction.

(c) Compared to the No Action alternative, would the Proposed Action or retained alternatives (if any) result in *direct effects* (physical disturbance or destruction, damage, alteration, isolation of the property from its surroundings, or moving a property from its historic location), or *indirect effects* (introduction of visual, auditory, or atmospheric elements that are out of character with the property or that would diminish the integrity of the property’s setting), on any NRHP property or NHRP-eligible property? Cross reference your response with other applicable impact categories such as noise and compatible land use, air quality and Section 4(f)/6(f) resources.

Discuss direct or indirect effects on NRHP or NHRP-eligible properties.

Based on the CRAS reports, the FAA has determined that there would be no direct impact to NRHP-listed or eligible properties to the SHPO and tribes. The SHPO and the Muscogee (Creek) Nation agreed with the findings of the CRAS reports that no direct impacts to NRHP-listed or NRHP-eligible properties would occur as a result of the Proposed Project. Additionally, the Muscogee (Creek) Nation and the Seminole Tribe of Florida stated that they have no objections to the project. Refer to SHPO correspondence in Attachment D3 and tribal correspondence in Attachment E.

No indirect impacts from noise, land-use compatibility, air quality, visual impact, or 4(f)/6(f) impacts would occur for this site as a result of the construction of the Proposed Project.

(9) LAND USE

(a) Compared to the No Action Alternative, would the Proposed Action and retained alternatives (if any) result in any impacts to off-airport land uses and/or require a change to the local comprehensive plan and zoning map?

Discuss any impacts to off-airport land uses or changes to a local comprehensive plan or zoning.

Neither the No Action alternative nor the Proposed Project would result in impacts to off-airport land use and/or require a change to the local comprehensive plan and zoning map because the Proposed Project would be constructed on Airport property. According to Tallahassee-Leon County zoning maps, the current zoning for the Solar Farm APE is Government Operation -2.²⁷ The current zoning allows for the construction of the Proposed Project and is consistent with the City of Tallahassee’s Comprehensive Growth Management Plan.

²⁷ <http://tlcgisinter.leoncountyfl.gov/zoning/> April 8, 2016



(b) Compared to the No Action alternative, would the Proposed Action and retained alternatives (if any) be located near or create a potential wildlife hazard as defined in FAA Advisory Circular 150/5200-33, "Wildlife Hazards on and Near Airports"?

Discuss potential wildlife hazards.

The Proposed Project would not affect or create potential wildlife hazards. Solar Farms are not wildlife attractants.

(c) If the Airport Sponsor is filing a federal Airport Improvement Program (AIP) grant application for construction of the Proposed Action, an executed letter from the Airport Sponsor to the FAA with the land use assurance language noted below must be attached as an appendix to this EA.

"Per 49 USC Section 47107(a)(10), that appropriate action, including adopting zoning laws, has been or will be taken to the extent reasonable, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including the landing and takeoff of aircraft."

Note: The Sponsor's assurance letter must be related to existing and future planned land uses in the airport vicinity.

Identify Draft EA Appendix that contains the Airport Sponsor's land use assurance letter or explain why one is not required.

The Airport Sponsor is not filing a federal AIP grant application for the construction of the Proposed Action. Therefore, a land use assurance letter is not required.

(10) NATURAL RESOURCES AND ENERGY SUPPLY

(a) Identify suppliers of energy resources found in the area such as power plants, water utilities, sewage disposal utilities, and suppliers of natural gas and petroleum, as applicable. Identify the approximate amount of other resources such as water, asphalt, aggregate, and wood a project would use in the construction, operation, and maintenance of a project and identify where the suppliers are located.

Discuss:

Energy Suppliers
The following are suppliers of energy resources within the City of Tallahassee:
Power Plants
1) City of Tallahassee Arvah B. Hopkins Generating Station – a natural gas generating station located 7 miles west of the City of Tallahassee.
2) City of Tallahassee Sam O. Purdom Generating Station – a natural gas electricity generating station located 20 miles south of the City of Tallahassee.
3) City of Tallahassee Substation 12 ICs – a natural gas generating station located 12 miles northeast of the City of Tallahassee.
Water Utilities



- 1) City of Tallahassee Water Utility

Natural Gas

- 1) City of Tallahassee Natural Gas Utility

Sewage Disposal Utilities

- 1) Thomas P. Smith Wastewater Treatment Facility - owned and operated by the City of Tallahassee.

Construction Materials Suppliers

- 1) Apalachee Ace Hardware
- 2) The Home Depot
- 3) Lowe’s Home Improvement
- 4) Fastenal
- 5) Capital City Lumber and Home Center
- 6) J.H. Doweling Construction Supply

Construction Materials

Unusual construction materials include three 40-foot electric utility metal poles which are ordered from a specialty supplier. The PV solar panels and other solar farm components have to be supplied by a solar farm supplier. All other construction materials required such as concrete, fencing, poles, wires, gravel, sod are normal materials that are not anticipated to be in short supply.

Maintenance

Water use requirements for maintaining solar power farms depend on the technology and weather and climate conditions. In general, solar farms use approximately 20 gallons of water per megawatt hour for cleaning solar collection surfaces.²⁸

(b) Compared to the No Action alternative, what effect would the Proposed Action and retained alternatives (if any) have on energy supplies or other natural resource consumption? Would demand exceed supply?

Explain:

Compared to the No Action Alternative, the Proposed Project would generate up to 42 MWac of clean solar electric power that would be fed into the City of Tallahassee’s electric grid.

(c) Identify whether the Proposed Action and retained alternatives (if any) would incorporate sustainable design features such as conservation of resources, use of pollution prevention measures, minimization of aesthetic effects, and address public (both local and traveling) sensitivity to these concerns.

Explain:

²⁸ SEIA, “Water Use Management,” <https://www.seia.org/initiatives/water-use-management>, 2018 (October 18, 2018).



In addition to providing clean power generation for the City, the Proposed Project would incorporate spill prevention, control, and countermeasures; stormwater pollution prevention; and conservation of resources through recycling of construction materials and debris where possible during the construction of the Proposed Project.

(11) NOISE AND COMPATIBLE LAND USE

(a) Determine if a noise analysis should be conducted per FAA Order 1050.1F, Appendix B . Airport operations must not exceed the threshold for both existing and forecast years (with and without the Proposed Action). If operations exceed the threshold, coordinate with the ORL/ADO EPS prior to conducting a noise analysis. **Note:** *No noise analysis is needed for projects involving Design Group I and II airplanes (wingspan less than 79 feet) in Approach Categories A through D (landing speed less than 166 knots) operating at airports whose forecast operations in the period covered by the NEPA document do not exceed 90,000 annual propeller operations (247 average daily operations) or 700 annual jet operations (2 average daily operations). These numbers of propeller and jet operations result in DNL 60 dB contours of less than 1.1 square miles that extend no more than 12,500 feet from start of takeoff roll. The DNL 65 dB contour areas would be 0.5 square mile or less and extend no more than 10,000 feet from start of takeoff roll. Also, no noise analysis is needed for projects involving existing heliports or airports whose forecast helicopter operations in the period covered by the NEPA document do not exceed 10 annual daily average operations with hover times not exceeding 2 minutes. These numbers of helicopter operations result in DNL 60 dB contours of less than 0.1 square mile that extend no more than 1,000 feet from the pad. Note that this rule applies to the Sikorsky S-70 with a maximum gross takeoff weight of 20,224 pounds and any other helicopter weighing less or producing equal or less noise levels. Airport forecasts must be consistent with the most recent FAA Terminal Area Forecast (TAF).*

Document the most recent TAF for the airport, the existing and forecast annual operations in the EA study years for the No Action alternative, the Proposed Action and any retained alternatives. Discuss whether the thresholds described above would be exceeded or not and whether a quantitative or qualitative noise analysis is appropriate for the Proposed Action.

The Proposed Project would not affect aircraft operations and fleet mix at TLH. No noise analysis is required.

(b) Aircraft noise screening may rule out the need for more detailed noise analysis if screening shows no potential for significant noise impacts. The Area Equivalent Method (AEM) can be used in evaluating proposed actions and alternative(s) at an airport which result in a general overall increase in daily aircraft operations or the use of larger/noisier aircraft, as long as there are no changes in ground tracks or flight profiles. If the AEM calculations indicate that the action would result in less than a 17 percent (approximately a DNL 1 dB) increase in the DNL 65 dB contour area, there would be no significant impact over noise sensitive areas and no further noise analysis would be required. If the AEM calculations indicate an increase of 17 percent or more, or if the action is such that use of the AEM is not appropriate, then the noise analysis must be performed using the Aviation Environmental Design Tool (AEDT) to determine if significant noise impacts would result. See the Area Equivalent Method (AEM) Version 7.0c User’s Guide, October 2012 for further information on conducting an AEM screening procedure. **Note:** *If more detailed noise analysis is required, the model must be used to determine if significant noise impacts would result from implementation of the Proposed Action. Information regarding the FAA’s AEDT 2b can be found in the 1050.1F Desk Reference and at <https://aedt.faa.gov/> .*



Explain the results of the AEM analysis if used.

Not applicable.

(c) Describe the affected environment for noise and noise compatible land use. Refer to the 1050.1F Desk Reference section 11.2, Affected Environment, for necessary information. The steps generally required to describe the affected environment for noise and noise compatible land are as follows:

- *Determine the study area for noise analysis.* An airport environs study area must be large enough to include the area within the DNL 65 dB contour, and may be larger.
- *Identify noise sensitive areas in the study area and pertinent land use information;* A noise sensitive area is defined in Paragraph 11-5.b (8) of FAA Order 1050.1F.
- *Describe **current** noise conditions in the study area.* Noise exposure contours must include DNL 65, 70, and 75 dB levels. Identify the number of residences or people residing within each noise contour where aircraft noise exposure is at or above DNL 65 dB. Identify the location and number of noise sensitive uses in addition to residences (e.g., schools, hospitals, nursing homes, parks, recreation areas, historic structures) that could be significantly impacted by noise. Use recent aerial photographs, GIS mapping and other resources to depict land uses within the noise study area.

Not applicable.

(d) Describe the potential noise impacts of the proposed action and alternative(s), if any, for each timeframe evaluated. Use the AEDT to provide noise exposure contours for DNL 5 dB increments for the DNL 65, 70, and 75 dB levels. For all comparisons analyzed, the analysis needs to identify noise increases of DNL 1.5 dB or more over noise sensitive areas that are exposed to noise at or above the DNL 65 dB noise exposure level, **or** that would be exposed at or above the DNL 65 dB level due to a 1.5 dB or greater increase, when compared to the No Action alternative for the same timeframe. For each modeling scenario analyzed, disclose, quantify and discuss:

- number of residences or people residing within each noise contour interval where aircraft noise exposure is at or above DNL 65 dB,
- the net increase or decrease in the number of people or residences exposed to each increment of noise
- location and number of noise sensitive land uses in addition to residences (e.g., schools, hospitals, nursing homes, parks, recreation areas, historic structures) exposed to DNL 65 dB or greater
- when DNL 1.5 dB increases to noise sensitive land uses are documented within the DNL 65 dB contour, also identify the location and number of noise sensitive land uses within the DNL 60 dB contour that are exposed to aircraft noise levels at or above DNL 60 dB but below DNL 65 dB and are projected to experience a noise increase of DNL 3 dB or more
- noise impact on noise sensitive areas within the DNL 65 dB contour.

Use multiple graphics to depict the noise contours and land uses and noise sensitive resources within the noise contours for all alternatives. Include arrival, departure and touch and go flight tracks. Graphics should be scaled and sufficiently large and clear to be readily understood.



Not applicable.

(e) Discuss whether there is a significant noise impact for the Proposed Action and retained alternatives (if any) compared to the No Action alternative. FAA Order 1050.1F Exhibit 4-1 provides the FAA’s significance threshold for noise i.e. *The action would increase noise by DNL 6 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65dB level due to a DNL 1.5dB or greater increase, when compared to the no action alternative for the same timeframe.* For example, an increase from DNL 65.5 dB to 67 dB is considered a significant impact, as is an increase from DNL 63.5 dB to 65 dB. The determination of significance must be obtained through the use of noise contours and/or grid point analysis along with local land use information and general guidance contained in Appendix “A”, Table 1 of 14 CFR part 150. If there is a potential significant noise impact for the Proposed Action, **do not** complete this EA and contact the ORL ADO/EPS for further guidance.

Explain:

Not applicable.

(e) For some noise analyses, it may be necessary to include noise sources other than aircraft departures and arrivals in the noise analysis. This can be determined by examining the action and determining the potential impacts caused by noise other than aircraft departures and arrivals. Some examples are engine run-ups, aircraft taxiing, construction noise, and noise from related roadway work and roadway noise. The inclusion of these sources should be considered on a case-by-case basis, as appropriate. Discuss whether the Proposed Action and retained alternatives (if any) have the potential to cause noise other than aircraft related noise. See 1050.1F Desk Reference, Section 11.5 for additional information.

Discuss if analysis of other noise sources is warranted. If it is, conduct the analysis and describe the results here.

Not applicable.

(f) Discuss any mitigation measures that are in effect at the time of the proposal or are proposed to be taken to mitigate significant impacts resulting from the Proposed Action and/or the retained alternatives. See 1050.1F Desk Reference, Section 11.6 for common operational measures to mitigate noise, common mitigation measures related to noise and noise-compatible land use, and common construction mitigation measures. Local land use actions are within the purview of local governments. The FAA encourages local governments to take actions to reduce and prevent land uses around airports that are not compatible with airport operations and aircraft noise. Airports receiving federal grant funding have a compatible land use obligation, as described in 1050.1F Desk Reference, Section 11.5.3 Airport Actions. Discuss what is being done regarding compatible land use by the local jurisdiction(s) with land use control authority.

Not applicable. No mitigation is required.

(12) SOCIOECONOMICS, ENVIRONMENTAL JUSTICE, AND CHILDREN’S ENVIRONMENTAL HEALTH AND SAFETY RISKS

(a) When compared to the No Action alternative, would the Proposed Project and retained alternatives (if any) change business and economic activity in the community; impact public



service demands; induce shifts in population movement and growth, or other factors identified by the public, etc.? If **YES**, describe how these impacts would be minimized or mitigated.

Explain:

Construction

The Proposed Project alternative would temporarily increase economic activity in the community during the construction of the Propose Project. The construction period duration is estimated at seven months and could employ up to 50 workers.

Operation and Maintenance

The operation and maintenance (O&M) of the Proposed Project would slightly enhance economic activity by contracting with a local solar farm maintenance contractor.

The Proposed Project is not anticipated to impact public service demands or induce shifts in population movement and growth. The small increase in labor demand created by the Proposed Project will most likely be met from the local communities within the County.

No adverse impact to human health and safety are anticipated as a result of the construction or operation of the Proposed Project.

(b) When compared to the No Action alternative, would the Proposed Project and retained alternatives (if any) result in the need to relocate any homes or businesses? If **YES, do not** complete this EA and contact the ORL/ADO EPS for further guidance.

Explain:

The Proposed Project is located on property owned by TLH. No homes or businesses will be affected by the Proposed Project.

(c) Cause an alteration in surface traffic patterns, or cause a noticeable increase in surface traffic congestion or a decrease in Level of Service (LOS) on local roadways?

Explain:

Access to the Proposed Project site during construction would be through two existing internal Airport unpaved access roads on TLH property. A temporary minor increase in surface traffic near TLH is anticipated during the construction of the Proposed Project due to commuting construction workers and delivery of construction materials. After construction of the Proposed Project is completed, the south Airport internal unpaved access road would be used for access. No long-term effects to surface traffic or Level of Service on local roadways would occur because operation and maintenance of the Proposed Project only requires minor periodic visits to the solar farm by a small crew.

(d) Would the Proposed Action and retained alternatives (if any) have the potential to lead to a disproportionately high and adverse impact to an environmental justice population, i.e., a low-income or minority population? Consider impacts in other environmental impact categories (noise, air); or impacts on the physical or natural environment that affect an



environmental justice population in a way that the FAA would determine are unique to the environmental justice population and significant to that population. See 1050.1F Desk Reference, Chapter 12 for guidance. If **YES, do not** complete this EA and contact the ORL/ADO EPS for further guidance.

Explain:

The Proposed Project is in an area isolated from residential land use and is bordered only by TLH and the Apalachicola National Forest. Once constructed, the Proposed Project would not generate noise and would not impact air quality. It would also be out of view of residential land use. The Proposed Project is not anticipated to have the potential to lead to a disproportionately high and adverse impact to any environmental justice populations.

(e) Would the Proposed Action and retained alternatives (if any) result in any environmental health risks and/or safety risks that may disproportionately affect children? Environmental health risks and safety risks include risks to health or to safety that are attributable to products or substances that a child is likely to come in contact with or ingest, such as air, food, drinking water, recreational waters, soil, or products they might use or be exposed to. It may be beneficial to determine the number of schools, daycares, parks, and children’s health clinics in the study area. Consider impacts to children’s health and safety in the context of other impact categories (air, noise, water quality).

Explain:

No, adverse impacts to human health and safety are not anticipated as a result of the construction or operation of the Proposed Project. Construction will take place within a secure area on airport property that does not have public access. There are no schools, daycares, parks, or health clinics near the Proposed Project. The Proposed Project would not cause impacts to air or water quality and would not generate noise once constructed.

(13) VISUAL EFFECTS INCLUDING LIGHT EMISSIONS

(a) Compared to the No Action alternative, describe any new lighting systems associated with the Proposed Action and retained alternatives (if any). Describe the new types of lighting, their intensity, height and direction of emissions that would be constructed and operational.

Explain:

Very little lighting would be present at the solar farm and there are no light sensitive properties adjacent to the Proposed Project. No effects from lighting would occur because of the Proposed Project.

(b) Would the Proposed Action and retained alternatives (if any) have the potential to create annoyance or interfere with normal activities for nearby residential areas or other light-sensitive resources or affect the visual character of the area due to the light emissions, including the importance, uniqueness, and aesthetic value of the affected visual resources? If appropriate, provide a graphic depicting the location of residential areas or other light-sensitive



resources in the airport vicinity in relation to the Proposed Action’s and retained alternatives (if any) new lighting system.

Explain:

The only adjacent property that is sensitive to visual effects is the Airport. A solar glare analysis was prepared to evaluate the potential effects of glare from the solar farm as part of the evaluation of the site that will contain the Proposed Project. **Attachment C**, the Solar Glare Analysis Report confirms lack of solar glare impacts on the ATCT or other airport operations from the Proposed Project. No adverse visual effects will occur as a result of the Proposed Project.

(c) Identify whether a local community, government or jurisdictional agency would consider visual effects from the Proposed Action’s (and retained alternatives) lighting objectionable to people’s properties and people’s use of resources covered by DOT Section 4(f), LWCF Section 6(f), and the National Historic Preservation Act (NHPA) Section 106. Consider the potential extent the proposed action would have to: affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources; contrast with the visual resources and/or visual character in the study area; and block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations.

Explain:

The Proposed Project does not need to comply with lighting and visual nuisances because of its location (at TLH and adjacent to Apalachicola National Forest) and very little lighting would be used at the facility.

(14) WATER RESOURCES - WETLANDS, FLOODPLAINS SURFACE WATERS, GROUNDWATER, AND WILD AND SCENIC RIVERS

WETLANDS

(a) Compared to the No Action alternative, would the Proposed Action and retained alternatives (if any) impact federal or state jurisdictional and non-jurisdictional wetlands? If **YES**, provide an assessment of the Proposed Action and retained alternatives (if any) wetland impacts. **Quantify both** acreage and Functional Loss in accordance with U.S. Army Corps of Engineers (USACE) and state agency (water management district (WMD)) or Florida Department of Environmental Protection (FDEP) requirements. If protected species or habitat resources are affected, USFWS and FWC must be consulted and consultation must be attached as an appendix to this EA. Cross-reference with Category (2) Biotic Resources, as applicable.

Provide assessment of wetland impacts:

The Proposed Project site does not contain jurisdictional or non-jurisdiction wetlands and does not affect waters of the United States.

(b) If the Proposed Action would unavoidably impact a wetland, explain why the wetland is the only practicable location for the Proposed Action. Consider the purpose and need, FAA design standards, engineering, environmental, economic, technical feasibility or any other applicable factor. FAA will consider this information in its independent evaluation of alternatives (see 40 CFR 1506.5.) **Note:** Federal regulations require "that no discharge shall be



permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact to the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences” (per Memorandum of Agreement between The Department of the Army and Environmental Protection Agency, The Determination of Mitigation under the Clean Water Act Section 404 (b)(1) Guidelines, February 1990.

Discuss:

There are no wetlands in the limits of the Proposed Project.

(c) If the Proposed Action would affect federal and/or state jurisdictional wetlands, discuss all practicable means to avoid and minimize wetland impacts through modifications or permit conditions. FAA will consider this information in its independent evaluation of measures that will be used to minimize harm to wetlands (see 40 CFR 1506.5).

Discuss avoidance and minimization measures evaluated and unavoidable wetland impacts:

There are no wetlands in the limits of the Proposed Project

(d) Discuss appropriate and practicable compensatory mitigation for unavoidable adverse impacts which remain after all appropriate and practicable minimization has been provided. Identify the location of proposed compensatory mitigation, including acreage, Functional Gain, and estimated cost. USACE and WMD or FDEP consultation must be attached in an appendix to this EA that includes acknowledgement of required permits and proposed mitigation.

Discuss compensatory mitigation and attach record of jurisdictional agency consultation:

No wetland or stream mitigation is required.

(e) List all required permits that will be obtained for wetland impacts (USACE Section 404, WMD, FDEP or local). USACE Standard Individual Permits require public notice. For NEPA purposes, this is conducted during public and agency review of the Draft EA. Note: Nationwide General Permits authorize a category of activities throughout the U.S., Puerto Rico, and U.S. Virgin Islands that are similar in nature and cause only minimal individual and cumulative environmental impacts. Nationwide General Permits may authorize minor filling, roads, utility lines, maintenance of existing structures and other minor activities; they may require mitigation. Standard Individual Permits are required for activities which may cause more than minimal adverse effects to the aquatic environment and exceed the terms and conditions of a general permit; they require public notice and review by state and federal resource agencies; most require mitigation.

List all wetland permits:

No wetland or stream impact will occur due to the Proposed Project.

(f) Attach a statement from the Airport Sponsor committing to the implementation of a mitigation plan developed to the satisfaction of the USACE in consultation with state and local agencies having an interest in the affected wetland.

No mitigation is required.

FLOODPLAINS



(a) Compared to the No Action alternative, would the Proposed Action and retained alternatives (if any) be located in, or encroach upon, any base/100-year floodplains, as designated by the Federal Emergency Management Agency (FEMA)? If **YES**, you must quantify the encroachment and attach the corresponding FEMA Flood Insurance Rate Map (FIRM) and proceed to (b) and (c).

Explain and quantify the floodplain encroachment and attach FEMA FIRM Map, if applicable:

The Proposed Project is not within the base/100-year floodplain.

(b) In accordance with Executive Order 11988, explain why the Proposed Action and retained alternatives (if any) must be located in or affect the base/100-year floodplain. Include (1) a description of significant facts considered in making the decision to locate the Proposed Action in or to affect the floodplain, including alternative sites and actions; (2) a statement indicating whether the Proposed Action (and retained alternatives if any) conforms to applicable state or local floodplain protection standards; (3) a description of the design steps taken to modify the Proposed Action to minimize potential harm to or within the floodplain; and (4) a statement indicating how the Proposed Action affects the natural or beneficial values of the floodplain.

Explain:

Not applicable.

(c) If the Proposed Action or retained alternative would cause an encroachment of a base/100-year floodplain, the Airport Sponsor must provide an opportunity for early public review during the EA process, in accordance with Section 2(a)(4) of Executive Order 11988 and Paragraph 7 of DOT Order 5650.2. For NEPA purposes, this is conducted during public and agency review of the Draft EA.

Discuss what actions were taken to make the Draft EA available for early public review and what notification of floodplain impacts was made.

Not applicable.

SURFACE WATERS AND GROUND WATERS

(a) When compared to the No Action alternative, will the Proposed Action and retained alternatives (if any) require a Section 401 water quality certificate (WQC) for construction activities or impacts to navigable waters, including jurisdictional wetlands? Explain the status of and/or any issues associated with obtaining this certificate. Attach any correspondence from the issuing agency. Cross reference your response with Wetlands, as applicable.

Explain:

Although the Proposed Project is not associated with Waters of the United States or wetlands, an FDEP Environmental Resource Permit is required for the construction of the Proposed Project because it will disturb 312 acres of uplands and a stormwater management system is required for the Proposed Project.



(b) Is a National Pollutant Discharge Elimination System (NPDES) permit required for the Proposed Action and retained alternatives (if any)? If **YES**, explain the status and attach any comments received from the issuing agency or a copy of the permit.

Explain:

An NPDES Permit for Construction Activity is required for construction of the Proposed Project because it will disturb more than one acre of land. The NPDES Permit for Construction Activity will be filed with FDEP after the FDEP issues the ERP for the Proposed Project.

(c) Would the Proposed Action and retained alternatives (if any) affect a public drinking water supply, a sole source aquifer, or a Comprehensive State Groundwater Protection Program (CSGWPP)? If **YES**, attach records of consultation with EPA and state, local or tribal water quality agencies responsible for protection programs.

Explain:

The U.S. Environmental Protection Agency’s NEPAassist²⁹ mapping tool was used to determine whether there are any sole source aquifers underlying the Proposed Project. The tool indicated that there are no such resources within or in the vicinity of the Proposed Project. Additionally, the Proposed Project would not affect public drinking water supply or a CSGWPP. The Proposed Project will be reviewed by the City of Tallahassee’s Aquifer Protection staff as part of the site review process, and this review will ensure that the Proposed Project will not harm the aquifer before the Proposed Project is permitted for construction. The amount of water necessary to operate and maintain the Proposed Project is not anticipated to impact water consumption at the City of Tallahassee.

(d) Provide sufficient description of the mitigation measures the Airport Sponsor will carry out for the Proposed Action to: meet WQC terms or the conditions of any applicable NPDES permits; protect public drinking water supplies or comply with applicable CSGWPPs; develop response plans to contain any potential spills of oil or oil-based products associated with the Proposed Action; meet any other substantial water quality concerns that water quality agencies identify; or, use best management practices (BMPs) or best available technologies (BATs).

In order to minimize impact associated with construction to air quality, noise, and water quality resources, measures specified in FAA AC 150/5370-10G, *Standards for Specifying Construction of Airports* will be implemented. Additionally, erosion and sediment control measures would be incorporated in the permit plans as required by the FDEP ERP and a Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented as required for the NPDES permit for Large Construction Activities.

WILD AND SCENIC RIVERS

(a) Is the Proposed Action’s project study area within any Wild and Scenic Rivers System (WSRS), study rivers, National Rivers Inventory (NRI), or otherwise eligible rivers or river segments under Section 5(d)? If no Wild and Scenic Rivers, study rivers, NRI, or Section 5(d)

²⁹ EPA, “NEPAassist,” <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, (October 23, 2018).



rivers are found within the study area, no further analysis is needed. If **YES**, contact an FAA ORL/ADO EPS for further guidance. **Note:** *The study area should be defined as the entire geographic area with the potential to be either directly or indirectly impacted by the proposed action and alternative(s). For example, if construction of a new facility is part of the proposed action or alternative(s), the study area should include any areas directly impacted through any visual, audible, or other type of intrusion that is out of character with the river or alters the outstanding features of the river’s setting. The study area should also include any area indirectly impacted by the proposed action and alternative(s), such as rivers or river segments many miles downstream from the construction footprint of a project which may experience changes in water quality or quantity due to the proposed action and alternative(s). In addition, the default boundaries of Wild and Scenic Rivers as defined in the Wild and Scenic Rivers Act extend to a maximum of one-quarter mile from the ordinary high water mark on each side of the river (an average of not more than 320 acres per mile). As a result, be sure to consider any area within this boundary as part of the study area. Florida has two rivers designated as wild and scenic in accordance with the Wild and Scenic Rivers Act; the Loxahatchee River in southeast Florida, and the Wekiva River in central Florida. The NPS’s NRI website at: <http://www.nps.gov/ncrc/programs/rtca/nri/> provides a map which can assist in determining if any rivers in the study area are included on the NRI; and the National Wild and Scenic River’s Designated Wild and Scenic Rivers website at: <http://www.rivers.gov/map.php> provides a list of all designated Wild and Scenic Rivers in the National System as well as all study rivers.*

Explain:

No Wild and Scenic Rivers or eligible rivers occur on the Airport or within the limits of the Proposed Project.

9. CUMULATIVE IMPACTS

Cumulative impacts are impacts that a proposed action and retained alternatives (if any) would have on a particular resource when added to impacts on that resource from past, present, and reasonably foreseeable future actions undertaken or proposed by the Airport Sponsor, the FAA, other Federal, state or local agencies, or a private entity. **Note:** *List all sources of information including projects shown on an airport’s ALP or identified in an airport’s master plan, on airport projects approved by the FAA, the airport’s 5 year CIP, the local jurisdiction’s approved land use map and long range transportation plan, and substantial locally approved development projects. Identify off-airport projects that are within the same political jurisdiction or within approximately 5 miles of the airport, and the existing and future 65 DNL noise contour. For wetland and biotic resource impacts consider water management district basin boundaries.*

(a) In order to determine whether the Proposed Action and retained alternatives (if any) would have a cumulative effect on any of the environmental impact categories discussed above, identify any on-airport projects that may have common timing and/or location; and any off-airport projects in the airport’s vicinity outside of the Airport Sponsor or FAA’s jurisdiction. Generally use 3 years for past projects and 5 years for future foreseeable projects. For each past, present, and future project, you must discuss environmental impacts and any required permits.

Explain:



Cumulative Airport Development Projects

Below is a list of past, current, and future projects that are identified in the TLH’s Master Plan and Joint Airport Capital Improvement Program (JACIP).

TLH Projects Completed Within the Last Three Years

- Airport Master Plan Update
- Airport Solar Farm 1
- Security Checkpoint Improvements (Design)

Current Airport Projects

- In-Line Baggage Handling System and Terminal Modernization
- South Apron Rehabilitation/Reconstruction (Design/Construction)
- Federal Inspection Services (FIS) Facility (Design/Construction)

TLH Projects Planned for the Next Five Years

- Security Checkpoint Improvements (Construction)
- Airfield Preservation
- Rehabilitate/Reconstruct Runway 18/36
- Security Fence and Gate Rehabilitation
- Air Traffic Control Tower Improvements
- ARFF Building Rehabilitation (Design/Construction)
- Terminal Landside Improvements and Consolidated Rental Car Facility
- Terminal Building Life Safety System Upgrades (Construction)
- Emergency Power Improvements
- Facilities Building Rehabilitation
- Renovate/Upgrade Operations Center
- Air Cargo Development Phase 1
- Large Corporate Hangar Phase 1
- Realign road and fencing for cemetery expansion

(b) Considering the impacts of the Proposed Action (and retained alternatives if any) together with the environmental impacts of past, present, and future projects discussed in 12(a) above, discuss whether cumulative impacts would exceed a significant impact threshold where one is provided. If no threshold is provided, discuss whether potential cumulative impacts would be considered substantial by any Federal, state, or local agency, or the public. *Significant impact thresholds are provided in Exhibit 4-1 of FAA Order 1050.1F and in 5050.4B Table 7-1 for each resource category.*

Explain:

There are minimal environmental impacts associated with the Proposed Project. The past, present, and future projects within and near the airport have generated or are anticipated to generate low to moderate environmental impacts. Although, the cumulative development projects have the potential to generate environmental and social impacts, existing programs, policies, and regulatory requirements are expected to avoid and/or minimize the potential for significant impacts. In some cases where unavoidable impacts will occur, appropriate mitigation would be required. The minimal impacts associated



with the Proposed Project, when considered in conjunction with impacts associated with past, present, and future development projects, are not expected to result in substantial cumulative impacts

10. MITIGATION MEASURES

(a) As defined in the CEQ Regulations at 40 CFR § 1508.20, mitigation includes avoiding the impact; minimizing the impact; rectifying the impact by repairing, rehabilitating, or restoring the environment; reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and compensating for the impact by replacing or providing substitute resources.

Summarize all mitigation measures discussed in the Environmental Impact Categories of this EA that will be taken to avoid creation of significant impacts to a particular resource as a result of the Proposed Action. Discuss any impacts that cannot be mitigated, or that cannot be mitigated below the threshold of significance. *Significant impact thresholds are provided in Exhibit 4-1 of FAA Order 1050.1F for each resource impact category and in 5050.4B Table 7-1.*

Impacts to gopher tortoise burrows within the limits of the Proposed Project will be mitigated by obtaining an FFWCC Gopher Tortoise Conservation Permit, excavating gopher tortoise burrows within the limits of the Proposed Project, and relocating tortoises that are collected to the Apalachicola National Forest Gopher Tortoise Research Site per the conditions of the gopher tortoise permit.

Unavoidable impact to bent golden aster will be mitigated for with a 14,350-foot long and 10-12-foot-wide buffer along the western border of the Proposed Project adjacent to the Apalachicola National Forest resulting in 3.95 acres of open space. This buffer area will also be the recipient site of 71 stems of bent golden aster that would be relocated from the impacted area of the Proposed Project (**Attachment D4** - Local Agency Correspondence).

Although no other protected species were found during the general protected species surveys, there is suitable habitat for the eastern indigo snake and Florida pine snake within the limits of the Proposed Project. As stated previously, the USFWS' Standard Protection Measures for the Eastern Indigo Snake will be implemented during construction. During the gopher tortoise burrow excavation, other commensal species captured because of the excavation efforts (such as Florida pine snakes) would be released within suitable habitat on TLH property outside of the limits of the proposed project. If other listed species are observed on site, the appropriate agency would be notified and if necessary, permits would be acquired. These measures will help to minimize potential effects to state- and federally-listed species.

Additionally, the maintenance of the tap will be integrated into the City's Migratory Bird Management Plan. Impacts to migratory bird nests may occasionally be required as part of the maintenance of the tap, but nests will be relocated where feasible and impacts will be minimized as described in the plan and under existing FWC relocation permits (**Attachment F**).



11. PERMITS

List all required permits for the Proposed Action, including the lead agency, status, and responsible entity. Discuss coordination with appropriate agencies and the expected time frame for receiving identified permits. Indicate whether any difficulties are anticipated in obtaining required permits. **Note:** *Even though the Airport Sponsor has/shall obtain one or more permits from the appropriate Federal, state, and local agencies for the Proposed Action, initiation of any construction activities shall **NOT** begin until the FAA has issued its environmental determination based on the information in this EA.*

The permits required for the construction of the Proposed Project are listed in **Table 4**, below.

TABLE 4 TLH SOLAR FARM 2 LIST OF PERMITS		
Lead Agency	Permit Name	Anticipated Issuance
City of Tallahassee	Land Use Compliance Certificate	September 2018
	Natural Features Inventory	November 2018
	Site Plan B Review	January 2019
	Environmental Impact Assessment	February 2019
	Environmental Management Permit	March 2019
	Building Permit	March 2019
Florida Department of Environmental Protection	Environmental Resource Permit	April 2019
Florida Fish and Wildlife Conservation Commission	Gopher Tortoise Conservation Permit*	April 2019
Florida Department of Environmental Protection	NPDES for Construction Activity	April 2019
LEGEND: *A 100% gopher tortoise survey will be conducted 90 days prior to construction to determine locations of all potentially occupied gopher tortoise burrows in the limits of the Proposed Project.		



12. CONSISTENCY WITH APPROVED PLANS OR LAWS

(a) Is the Proposed Action consistent with existing environmental plans, laws, and administrative determinations of Federal, state, regional, or local agencies?

Explain:

The Proposed Project is consistent with existing environmental plans, laws, and administrative determinations of Federal, state, regional, and local agencies. The Proposed Project is also consistent with the 2006 Florida Energy Plan.³⁰

(b) Are there any other Federal approvals or permits required?

Explain:

No other federal approvals or permits are required.

(c) Is the Proposed Action consistent with plans, goals, policies, or controls that have been adopted for the area in which the airport is located?

Explain:

The Proposed Project is consistent with the plans, goals, and policies of the City of Tallahassee.

13. PUBLIC AVAILABILITY

(a) Discuss whether any public meetings were held during development of the Draft EA. Provide a list of all agencies and persons consulted in the preparation of this EA. Discuss any input from local officials or public groups regarding the Proposed Action. Discuss whether a public hearing is warranted i.e. there is substantial environmental controversy concerning the Proposed Action or there is substantial interest in holding a hearing or another agency with jurisdiction over the action requests a public hearing.

No public meeting or hearing was held during development of the Draft EA.

(b) After review by the FAA ORL/ADO EPS, the EA must be issued by the Airport Sponsor as a Draft EA for a 30-day public and agency review period. Concurrent with the 30-day public review period, the Airport Sponsor must submit the Draft EA to the Florida State Clearinghouse and to Federal, state and local agencies (as determined by the ORL/ADO EPS). The Airport Sponsor must publish a notice of availability of the Draft EA for public review in the local newspaper and airport sponsor’s website, if available. **Note:** *Certain special purpose*

³⁰ Florida Solar Energy Center “Florida’s Energy Plan” http://www.fsec.ucf.edu/EN/media/enews/2006/2006-01_Energy-plan.htm (March 13, 2019)



environmental laws, regulations, or executive orders require public notice, and must be included as part of the Draft EA notice of availability. These include but are not limited to section 2(1)(4) of E.O. 11988, Floodplain Management, section 2(b) of E.O. 11990, Protection of Wetlands, Section 7 of the Endangered Species Act, Section 106 of the National Historic Preservation Act, and Order DOT 5610.2, Environmental Justice.

Discuss and acknowledge submittal of a Draft EA for public and agency review.

The Public Notice and Draft EA was made available for a 30- day public review and comment period at the Utility’s web site on March 22, 2019 and at Tallahassee International Airport’s web site on March 23, 2019. Public notice was provided in the Tallahassee Democrat on March 24, 2019 and March 27, 2019. Printed copies of the Draft EA were also made available at two Leon County libraries namely, Fort Braden Branch Library and Dr. BL Perry Jr. Branch Library. A printed copy of the Draft EA was also available for review at Tallahassee International Airport during regular working hours. The comment period started on March 23, 2019 until April 22, 2019. No comments were received.

The Draft EA was submitted to the Florida Clearinghouse on March 22, 2019. Additionally, copies of the Draft EA were forwarded via electronic mail to the City of Tallahassee Growth Management Department.

(c) Comments on the Draft EA received from the Florida State Clearinghouse, Federal and state agencies, and the public must be attached to the Final EA. The Airport Sponsor must provide draft responses for FAA review by the ORL/ADO EPS.

Summarize comments received and identify an appendix to the EA within which the comments and responses are found.

No public comments were received. This is stated in **Attachment G**. Draft responses to all other comments received are provided in **Attachment H**.

14. LIST ALL ATTACHMENTS TO THIS EA

List of Attachments	
Attachment A	Figures
Attachment B	Interim ALP with Proposed Project or Solar Project 2
Attachment C	Solar Glare Analysis Report
Attachment D1	Agency Distribution List and Early Notification Letter
Attachment D2	Federal Agency Correspondence
	<i>U.S. Department of Agriculture – National Forest Service Correspondence</i>
	<i>U.S. Department of Agriculture – National Resource Conservation Service Correspondence</i>
	<i>U.S. Fish and Wildlife Service Correspondence</i>



Attachment D3	State Agency Correspondence
	<i>Florida Department of Environmental Protection Correspondence</i>
	<i>Florida Division of Historical Resources Correspondence</i>
	<i>Florida Department of Transportation Correspondence</i>
	<i>Florida Fish and Wildlife Conservation Commission Correspondence</i>
Attachment D3	<i>Florida State Clearinghouse Correspondence</i>
	<i>Northwest Florida Water Management District Correspondence</i>
Attachment D4	Local Agency Correspondence
	<i>City of Tallahassee Growth Management Department Correspondence</i>
Attachment E	Tribal Correspondence
Attachment F	City of Tallahassee Migratory Bird Management Plan
Attachment G	Public Comments and Responses
Attachment H	Summary of Comments and Responses



15. PREPARER CERTIFICATION

I certify that the information I have provided above is, to the best of my knowledge, true and correct.

Signature:

Name, Title:

Mariben Espiritu Andersen, Sr. Associate/Environmental Manager

Affiliation:

Michael Baker International, Inc.

Date:

May 10, 2019

Phone Number:

(813) 466-6026

Email:

mandersen@mbakerintl.com

16. AIRPORT SPONSOR CERTIFICATION

I certify that the information I have provided above is, to the best of my knowledge, true and correct. I also recognize and agree that no construction activity, including but not limited to site preparation, demolition, or land disturbance, shall proceed for the above proposed action(s) until FAA issues a final environmental decision for the proposed action(s), and until compliance with all other applicable FAA approval actions (e.g., ALP approval, airspace approval, grant approval) has occurred and all appropriate Federal, state and local permits and certifications have been obtained.

Signature:

Name, Title:

Alisha Wetherell, Airport Engineer

Affiliation:

Tallahassee International Airport

Date:

May 10, 2019

Phone Number:

(850) 891-7873

Email:

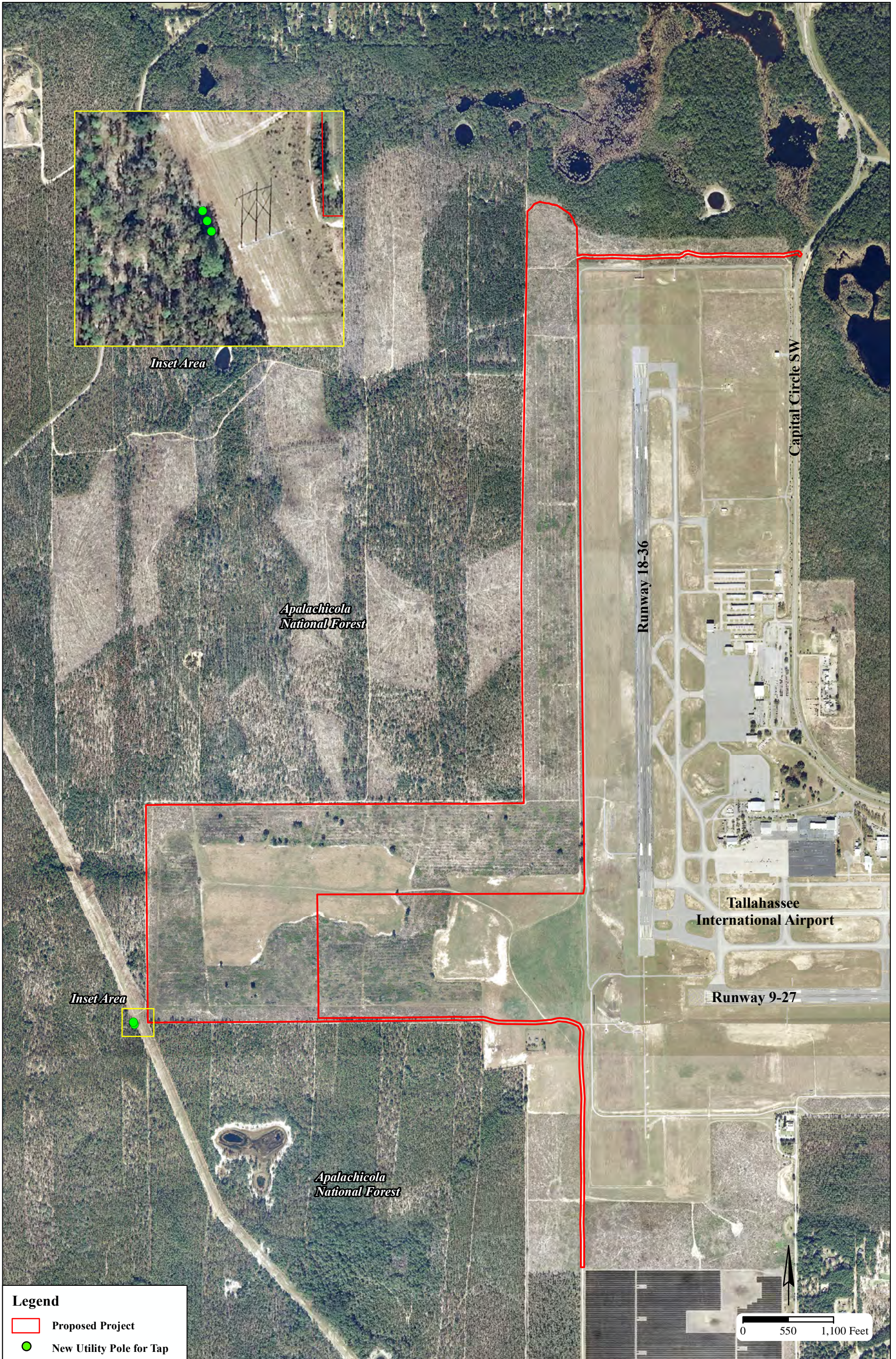
Alisha.Wetherell@talgov.com



ENDNOTES:

ATTACHMENT A

Figures

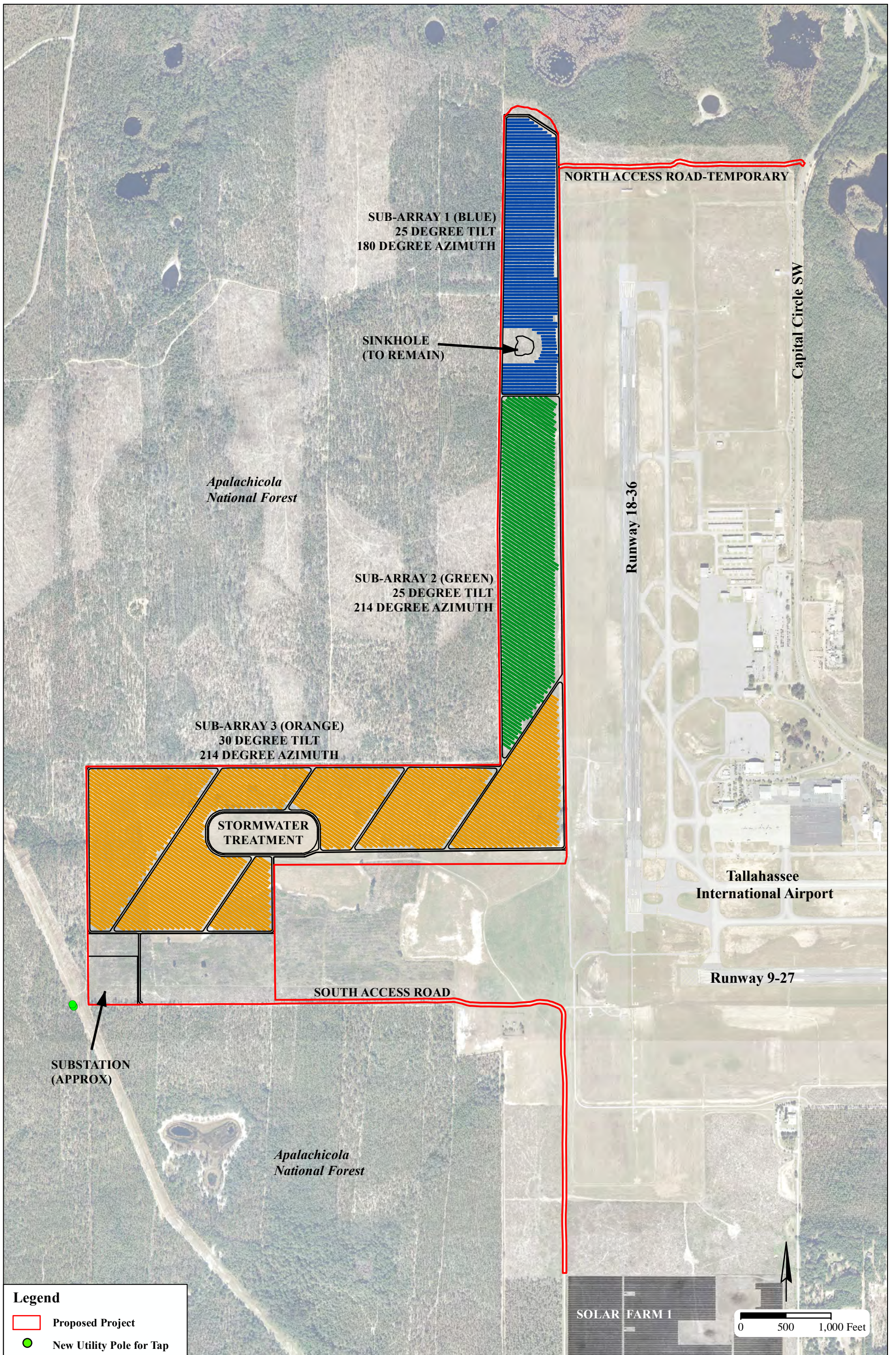


Legend

- Proposed Project
- New Utility Pole for Tap

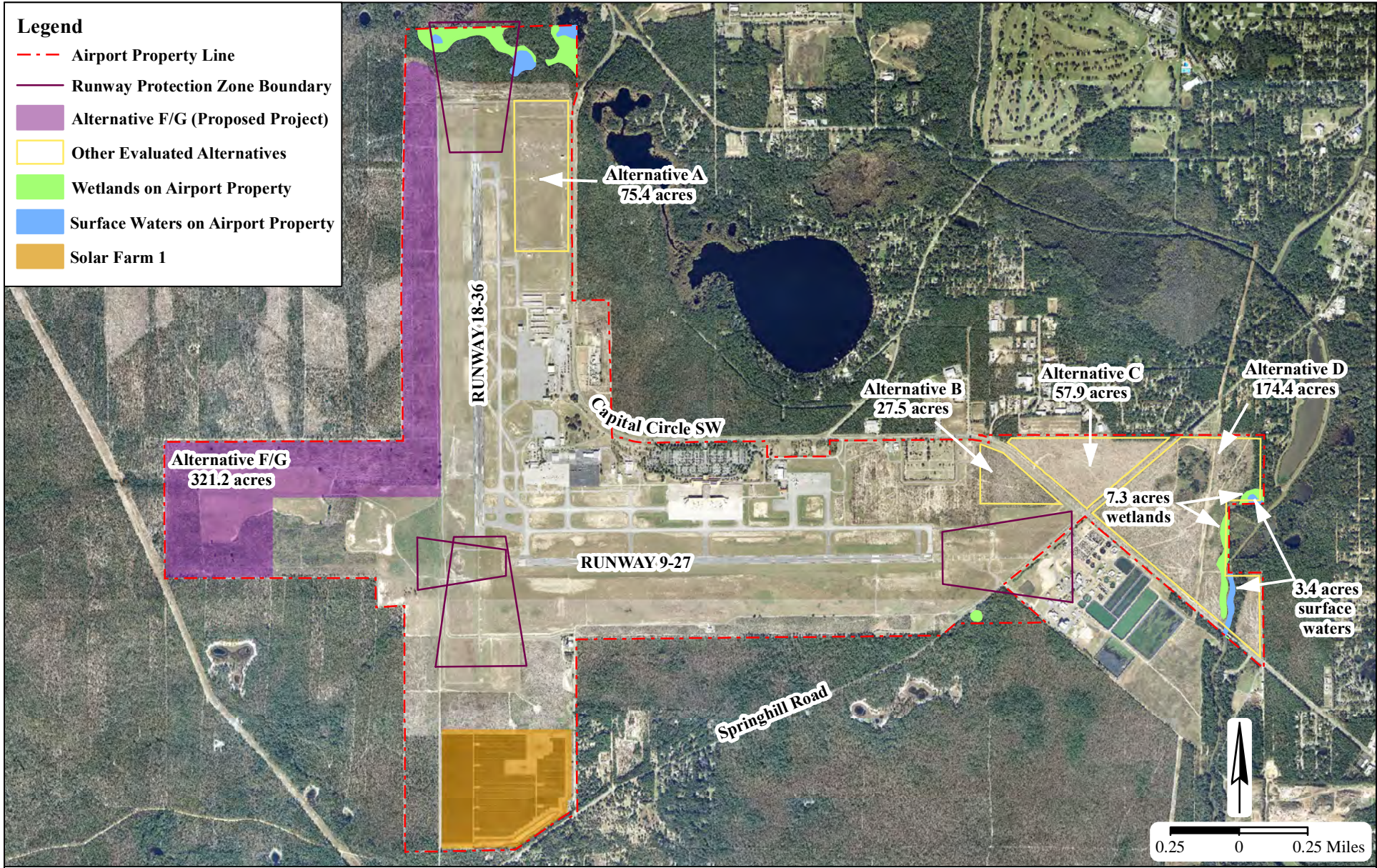
PROJECT AREA
FL Solar 4, LLC / Tallahassee International Airport Solar Project 2
Environmental Assessment

Figure 2



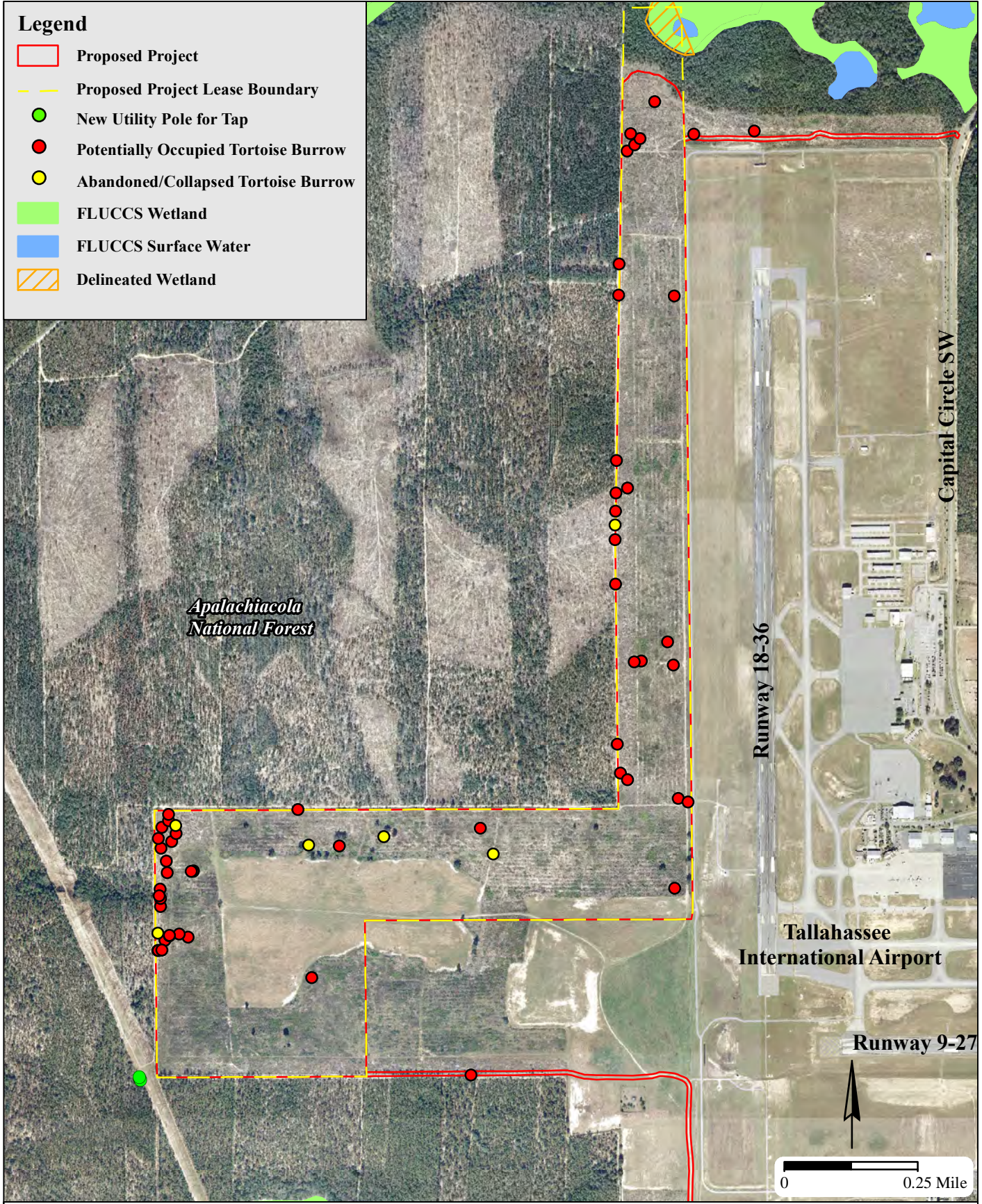
CONCEPTUAL LAYOUT
FL Solar 4, LLC / Tallahassee International Airport Solar Project 2
Environmental Assessment

Figure 3



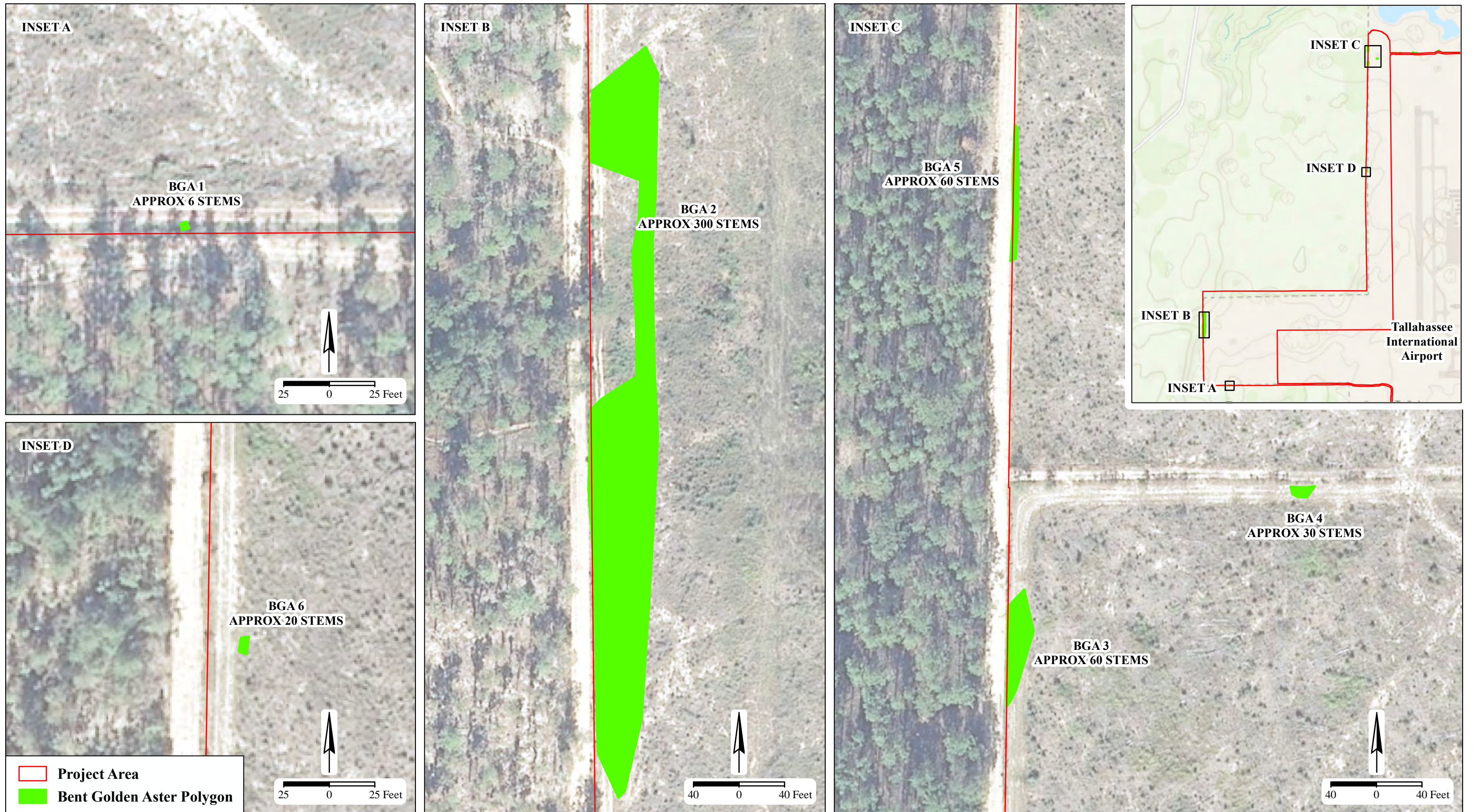
ALTERNATIVE LOCATIONS
FL Solar 4, LLC / Tallahassee International Airport Solar Project 2
Environmental Assessment

Figure
4



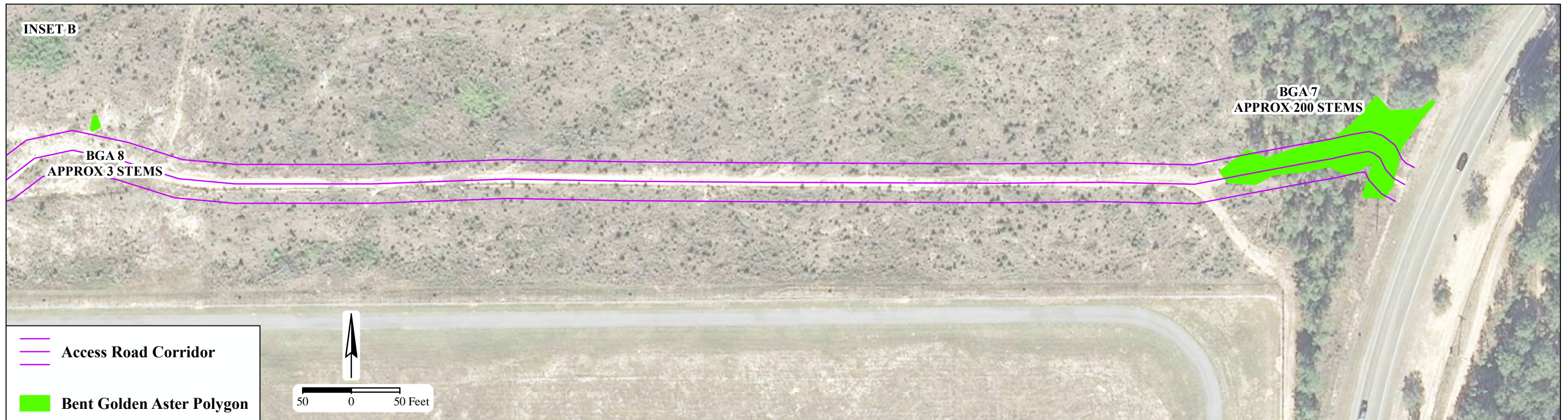
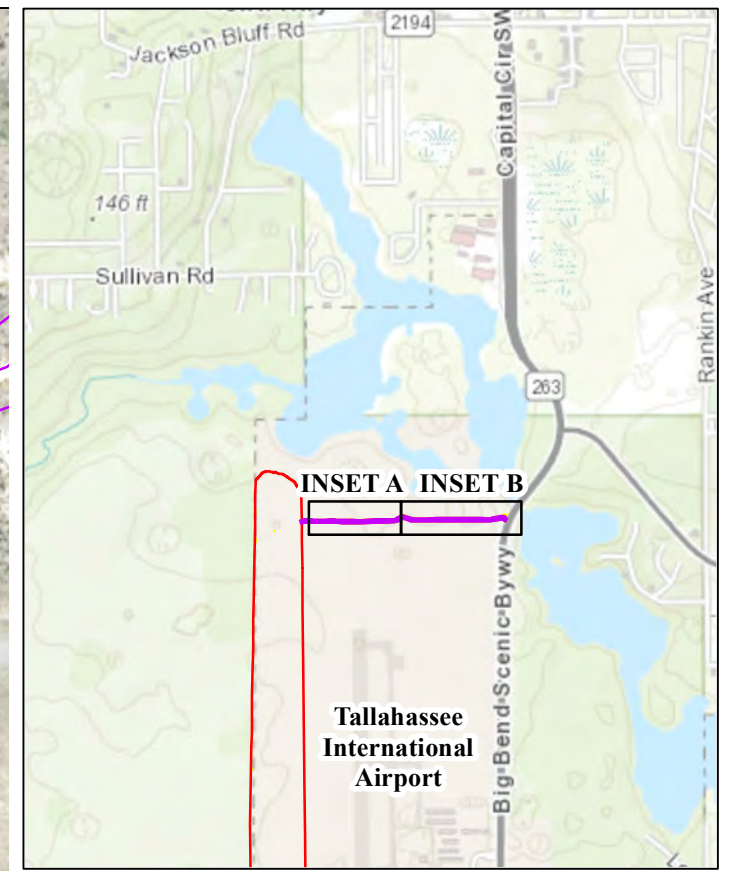
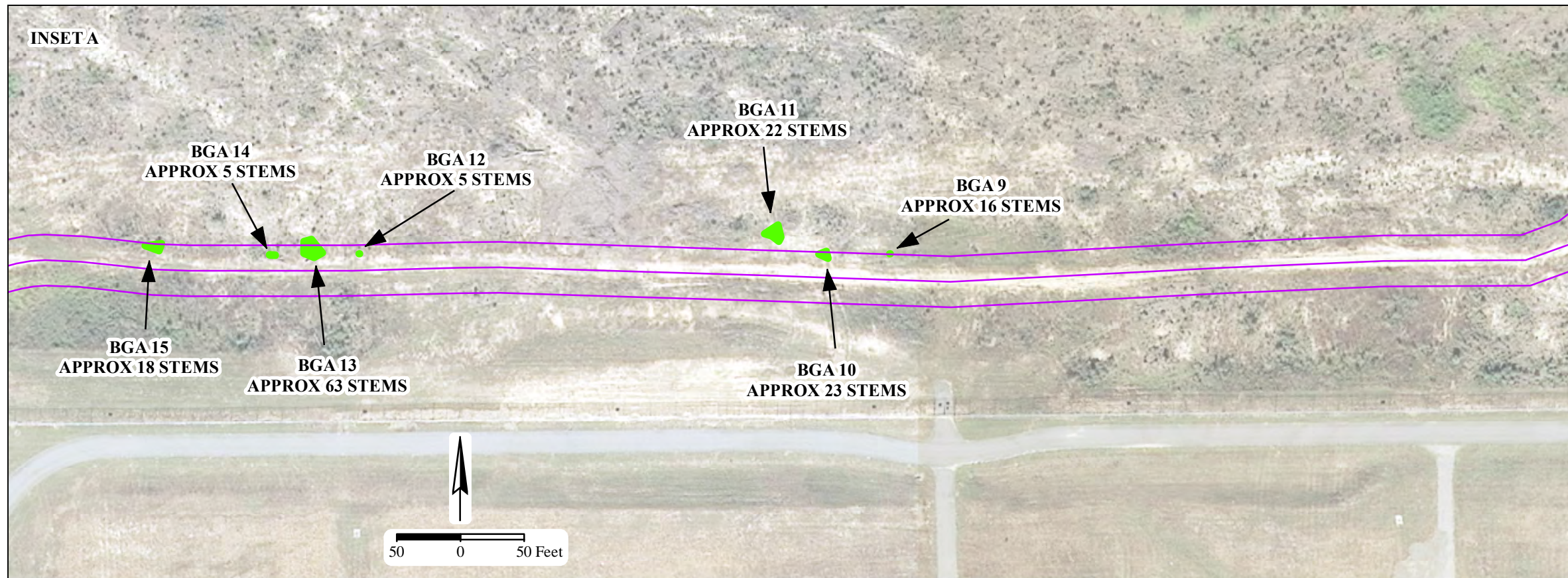
WETLANDS AND GOPHER TORTOISE BURROWS
FL Solar 4, LLC / Tallahassee International Airport Solar Project 2
Environmental Assessment

Figure 5



BENT GOLDEN ASTER OCCURRENCES
FL Solar 4, LLC / Tallahassee International Airport Solar Project 2
Environmental Assessment

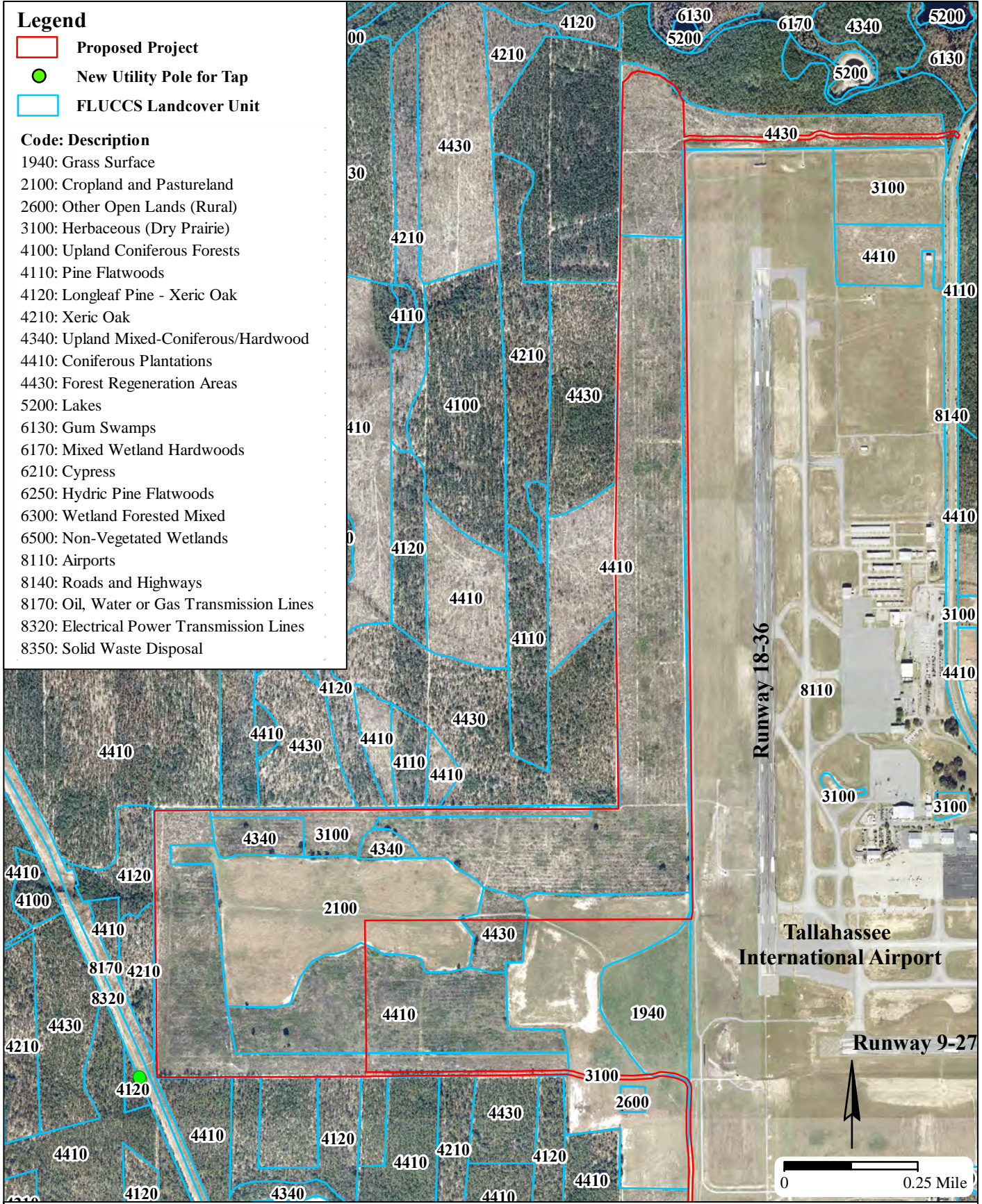
Figure 6A

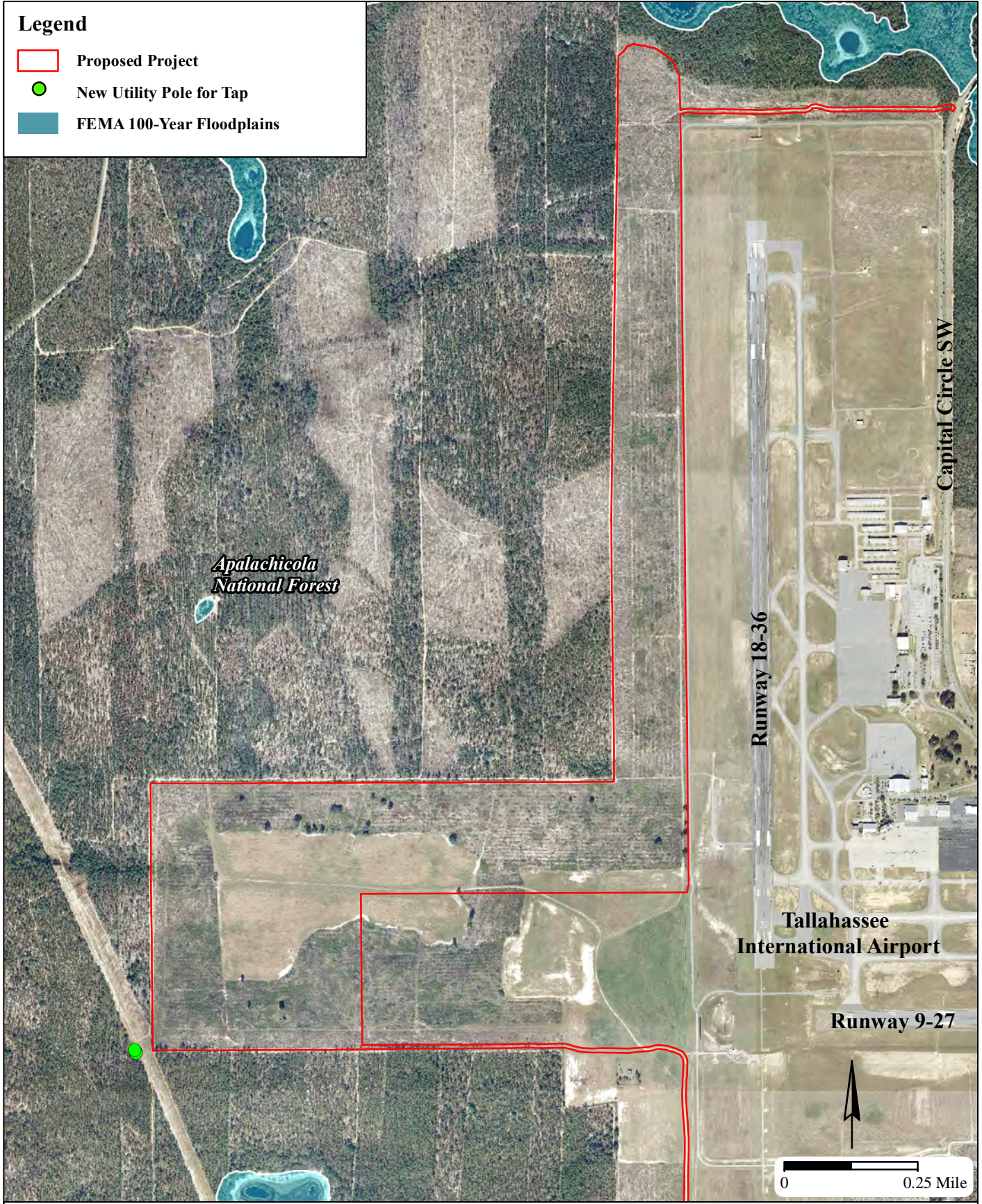


BENT GOLDEN ASTER OCCURRENCES
FL Solar 4, LLC / Tallahassee International Airport Solar Project 2
Environmental Assessment

Figure 6B

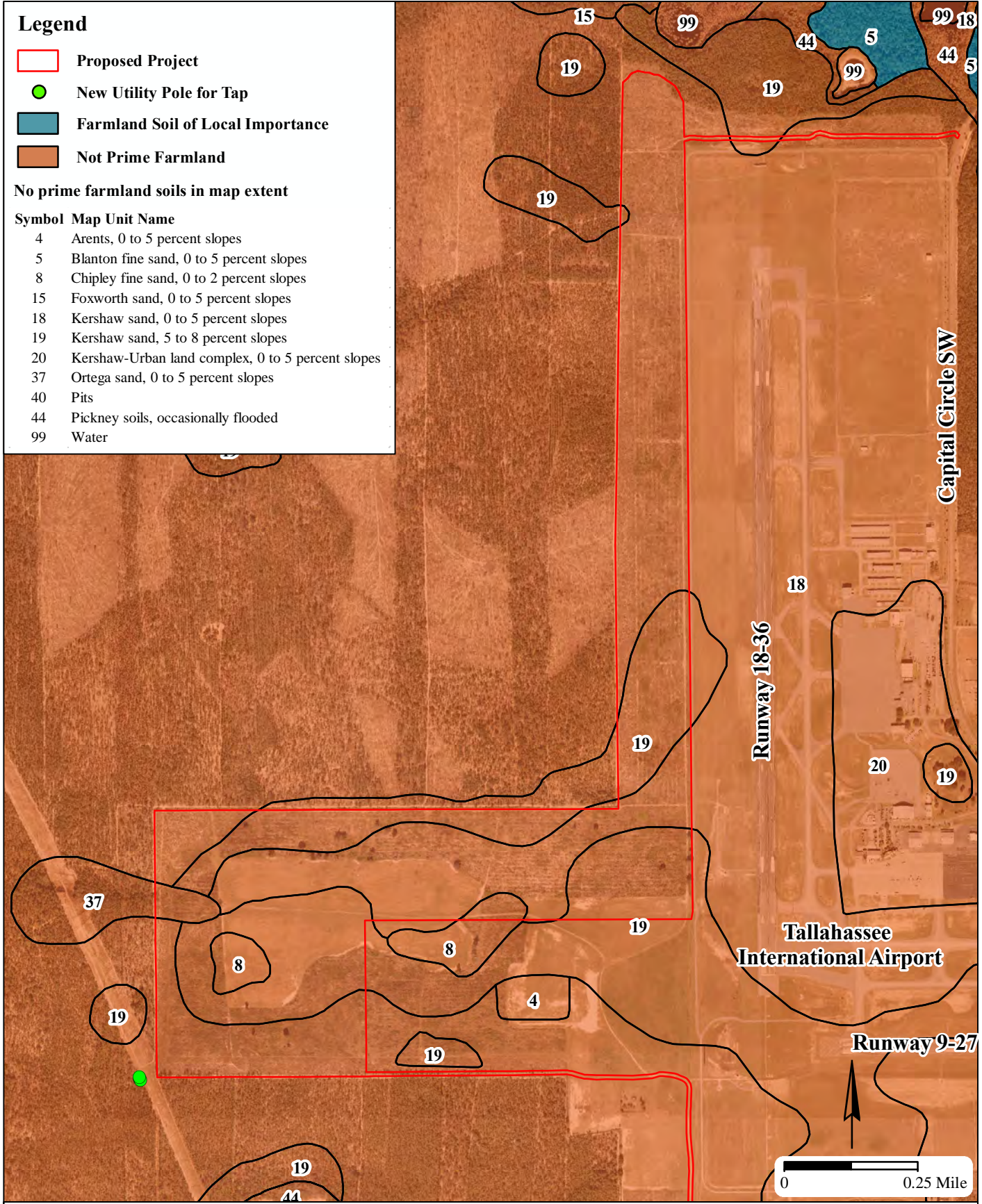






FEMA 100-YEAR FLOODPLAINS
FL Solar 4, LLC / Tallahassee International Airport Solar Project 2
Environmental Assessment

Figure 8



NRCS IMPORTANT FARMLAND SOILS
FL Solar 4, LLC / Tallahassee International Airport Solar Project 2
Environmental Assessment

Figure 9

ATTACHMENT B

An electronic copy of the ALP can be obtained by contacting:

**Ms. Alisha Wetherell
Tallahassee International Airport
3300 Capital Circle, SW Suite 1
Tallahassee, Florida 32310**

ATTACHMENT C

Solar Glare Analysis Report



FORGESOLAR GLARE ANALYSIS

Project: **Florida**

Site configuration: **Tallahassee FAA FINAL**

Analysis conducted by Loren Powers (loren.powers@dnvgl.com) at 21:11 on 26 Oct, 2018.

U.S. FAA 2013 Policy Adherence

The following table summarizes the policy adherence of the glare analysis based on the 2013 U.S. Federal Aviation Administration Interim Policy 78 FR 63276. This policy requires the following criteria be met for solar energy systems on airport property:

- No "yellow" glare (potential for after-image) for any flight path from threshold to 2 miles
- No glare of any kind for Air Traffic Control Tower(s) ("ATCT") at cab height.
- Default analysis and observer characteristics (see list below)

ForgeSolar does not represent or speak officially for the FAA and cannot approve or deny projects. Results are informational only.

COMPONENT	STATUS	DESCRIPTION
Analysis parameters	PASS	Analysis time interval and eye characteristics used are acceptable
Flight path(s)	PASS	Flight path receptor(s) do not receive yellow glare
ATCT(s)	PASS	Receptor(s) marked as ATCT do not receive glare

Default glare analysis and observer eye characteristics are as follows:

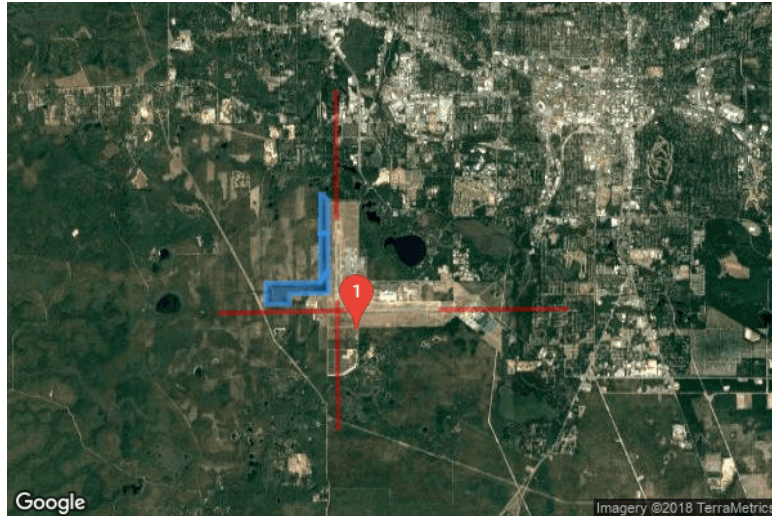
- Analysis time interval: 1 minute
- Ocular transmission coefficient: 0.5
- Pupil diameter: 0.002 meters
- Eye focal length: 0.017 meters
- Sun subtended angle: 9.3 milliradians

FAA Policy 78 FR 63276 can be read at <https://www.federalregister.gov/d/2013-24729>

SITE CONFIGURATION

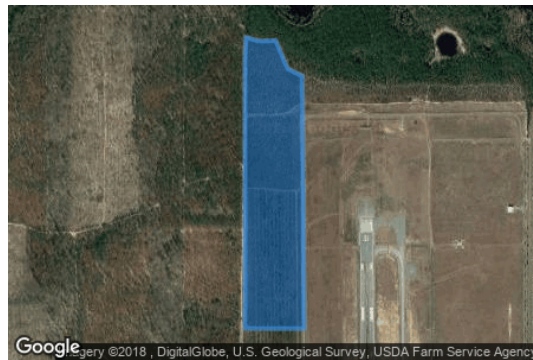
Analysis Parameters

DNI: peaks at 1,000.0 W/m²
 Time interval: 1 min
 Ocular transmission coefficient: 0.5
 Pupil diameter: 0.002 m
 Eye focal length: 0.017 m
 Sun subtended angle: 9.3 mrad
 Site Config ID: 22208.3805



PV Array(s)

Name: PV array 1
Axis tracking: Fixed (no rotation)
Tilt: 25.0°
Orientation: 180.0°
Rated power: -
Panel material: Smooth glass without AR coating
Reflectivity: Vary with sun
Slope error: correlate with material



Vertex	Latitude (°)	Longitude (°)	Ground elevation (ft)	Height above ground (ft)	Total elevation (ft)
1	30.416909	-84.361336	62.30	8.00	70.30
2	30.416312	-84.361325	71.18	8.00	79.18
3	30.415686	-84.361314	72.53	8.00	80.53
4	30.415686	-84.361313	72.53	8.00	80.53
5	30.409031	-84.361258	79.38	8.00	87.38
6	30.409038	-84.363415	82.67	8.00	90.67
7	30.417507	-84.363413	59.63	8.00	67.63
8	30.418118	-84.363377	56.57	8.00	64.57
9	30.418002	-84.362916	58.09	8.00	66.09
10	30.418025	-84.362304	54.61	8.00	62.61
11	30.417137	-84.361864	65.83	8.00	73.83

Name: PV array 2

Axis tracking: Fixed (no rotation)

Tilt: 25.0°

Orientation: 214.0°

Rated power: -

Panel material: Smooth glass without AR coating

Reflectivity: Vary with sun

Slope error: correlate with material



Vertex	Latitude (°)	Longitude (°)	Ground elevation (ft)	Height above ground (ft)	Total elevation (ft)
1	30.409038	-84.363415	82.67	8.00	90.67
2	30.409031	-84.361258	79.38	8.00	87.38
3	30.400675	-84.361153	63.71	8.00	71.71
4	30.397781	-84.363417	47.56	8.00	55.56

Name: PV array 3

Axis tracking: Fixed (no rotation)

Tilt: 30.0°

Orientation: 214.0°

Rated power: -

Panel material: Smooth glass without AR coating

Reflectivity: Vary with sun

Slope error: correlate with material



Vertex	Latitude (°)	Longitude (°)	Ground elevation (ft)	Height above ground (ft)	Total elevation (ft)
1	30.397780	-84.363417	47.56	8.00	55.56
2	30.400675	-84.361153	63.71	8.00	71.71
3	30.395320	-84.361113	45.12	8.00	53.12
4	30.395091	-84.371564	52.84	8.00	60.84
5	30.392737	-84.371564	83.32	8.00	91.32
6	30.392737	-84.377911	57.63	8.00	65.63
7	30.397670	-84.377959	115.13	8.00	123.13
8	30.397780	-84.363417	47.56	8.00	55.56
9	30.397780	-84.363417	47.56	8.00	55.56
10	30.397780	-84.363417	47.56	8.00	55.56
11	30.397780	-84.363417	47.56	8.00	55.56
12	30.397780	-84.363417	47.56	8.00	55.56
13	30.397780	-84.363417	47.56	8.00	55.56
14	30.397780	-84.363417	47.56	8.00	55.56
15	30.397780	-84.363417	47.56	8.00	55.56
16	30.397781	-84.363417	47.56	8.00	55.56

Flight Path Receptor(s)

Name: FP 1 RW27

Description: None

Threshold height: 50 ft

Direction: 88.8°

Glide slope: 3.0°

Pilot view restricted? Yes

Vertical view: 30.0°

Azimuthal view: 50.0°



Point	Latitude (°)	Longitude (°)	Ground elevation (ft)	Height above ground (ft)	Total elevation (ft)
Threshold	30.391315	-84.356532	61.10	50.00	111.11
Two-mile	30.390709	-84.390083	89.90	574.63	664.53

Name: FP 2 RW9

Description: None

Threshold height: 50 ft

Direction: 269.6°

Glide slope: 3.0°

Pilot view restricted? Yes

Vertical view: 30.0°

Azimuthal view: 50.0°



Point	Latitude (°)	Longitude (°)	Ground elevation (ft)	Height above ground (ft)	Total elevation (ft)
Threshold	30.391518	-84.331175	49.10	50.00	99.10
Two-mile	30.391720	-84.297618	65.50	587.03	652.53

Name: FP 3 RW36

Description: None

Threshold height: 50 ft

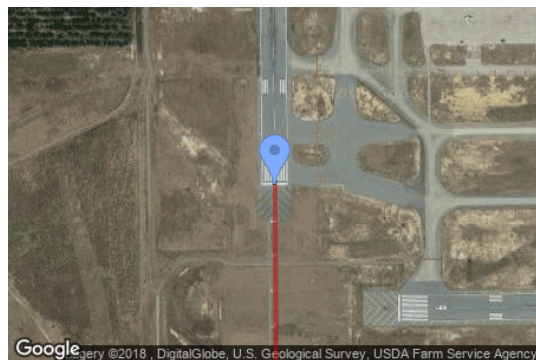
Direction: 359.6°

Glide slope: 3.0°

Pilot view restricted? Yes

Vertical view: 30.0°

Azimuthal view: 50.0°



Point	Latitude (°)	Longitude (°)	Ground elevation (ft)	Height above ground (ft)	Total elevation (ft)
Threshold	30.393241	-84.358792	53.20	50.00	103.21
Two-mile	30.364329	-84.358557	48.70	607.93	656.63

Name: FP 4 RW18

Description: None

Threshold height: 50 ft

Direction: 179.6°

Glide slope: 3.0°

Pilot view restricted? Yes

Vertical view: 30.0°

Azimuthal view: 50.0°

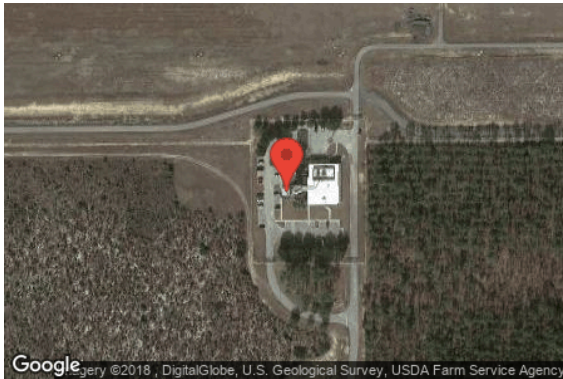


Point	Latitude (°)	Longitude (°)	Ground elevation (ft)	Height above ground (ft)	Total elevation (ft)
Threshold	30.412488	-84.358997	75.40	50.00	125.41
Two-mile	30.441400	-84.359231	52.60	626.23	678.83

Discrete Observation Receptors

Name	ID	Latitude (°)	Longitude (°)	Elevation (ft)	Height (ft)
1-ATCT	1	30.386910	-84.353610	73.00	110.61

Map image of 1-ATCT



GLARE ANALYSIS RESULTS

Summary of Glare

PV Array Name	Tilt (°)	Orient (°)	"Green" Glare min	"Yellow" Glare min	Energy kWh
PV array 1	25.0	180.0	46	0	-
PV array 2	25.0	214.0	212	0	-
PV array 3	30.0	214.0	10,161	0	-

Total annual glare received by each receptor

Receptor	Annual Green Glare (min)	Annual Yellow Glare (min)
FP 1 RW27	10373	0
FP 2 RW9	46	0
FP 3 RW36	0	0
FP 4 RW18	0	0
1-ATCT	0	0

Results for: PV array 1

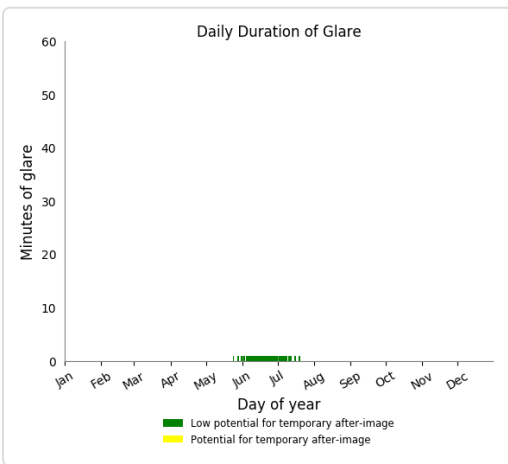
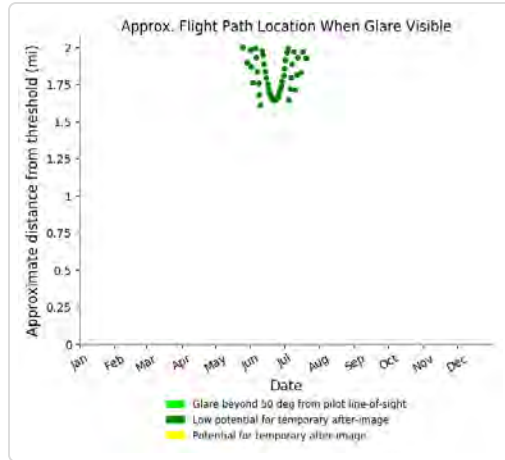
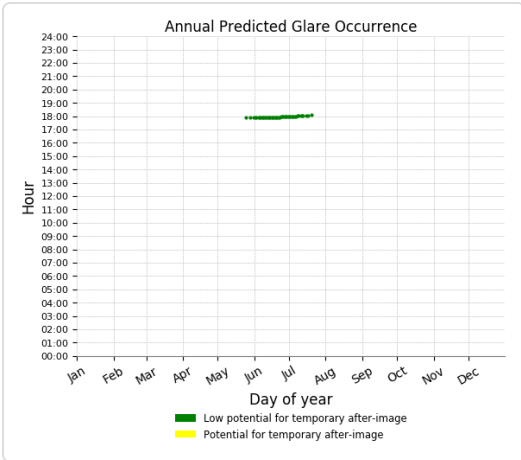
Receptor	Green Glare (min)	Yellow Glare (min)
FP 1 RW27	0	0
FP 2 RW9	46	0
FP 3 RW36	0	0
FP 4 RW18	0	0
1-ATCT	0	0

Flight Path: FP 1 RW27

0 minutes of yellow glare
0 minutes of green glare

Flight Path: FP 2 RW9

0 minutes of yellow glare
46 minutes of green glare



Flight Path: FP 3 RW36

0 minutes of yellow glare
 0 minutes of green glare

Flight Path: FP 4 RW18

0 minutes of yellow glare
 0 minutes of green glare

Point Receptor: 1-ATCT

0 minutes of yellow glare
 0 minutes of green glare

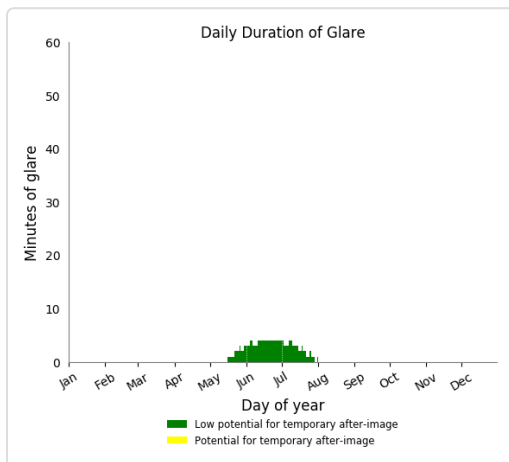
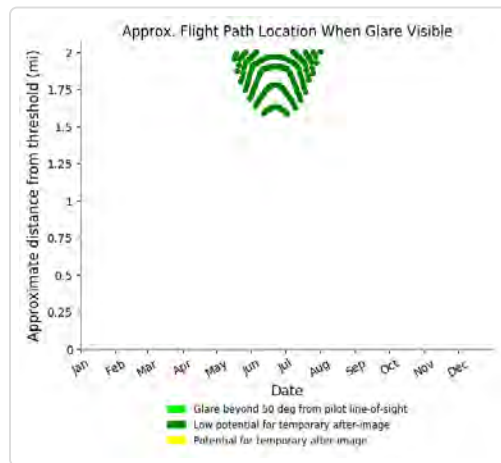
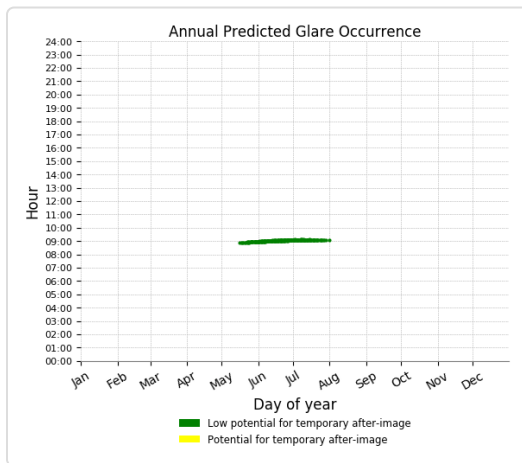
Results for: PV array 2

Receptor	Green Glare (min)	Yellow Glare (min)
FP 1 RW27	212	0
FP 2 RW9	0	0
FP 3 RW36	0	0
FP 4 RW18	0 <td 0	
1-ATCT	0	0

Flight Path: FP 1 RW27

0 minutes of yellow glare

212 minutes of green glare



Flight Path: FP 2 RW9

0 minutes of yellow glare

0 minutes of green glare

Flight Path: FP 3 RW36

0 minutes of yellow glare
0 minutes of green glare

Flight Path: FP 4 RW18

0 minutes of yellow glare
0 minutes of green glare

Point Receptor: 1-ATCT

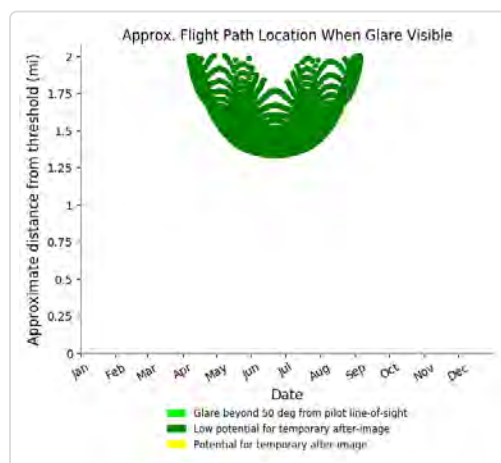
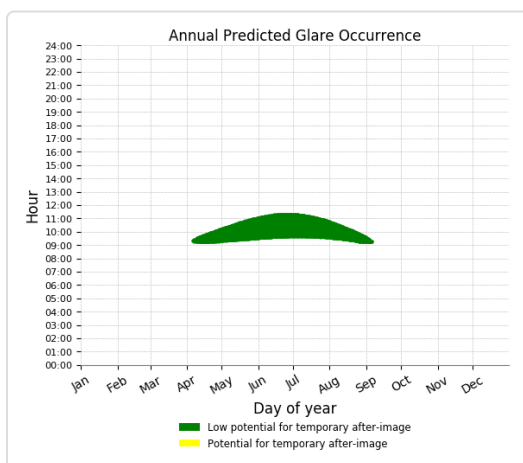
0 minutes of yellow glare
0 minutes of green glare

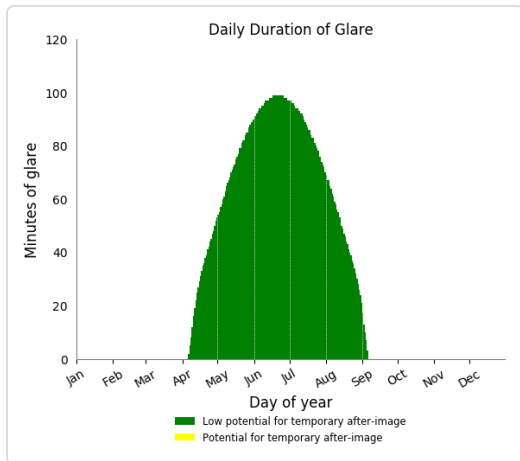
Results for: PV array 3

Receptor	Green Glare (min)	Yellow Glare (min)
FP 1 RW27	10161	0
FP 2 RW9	0	0
FP 3 RW36	0	0
FP 4 RW18	0	0
1-ATCT	0	0

Flight Path: FP 1 RW27

0 minutes of yellow glare
10161 minutes of green glare





Flight Path: FP 2 RW9

0 minutes of yellow glare
0 minutes of green glare

Flight Path: FP 3 RW36

0 minutes of yellow glare
0 minutes of green glare

Flight Path: FP 4 RW18

0 minutes of yellow glare
0 minutes of green glare

Point Receptor: 1-ATCT

0 minutes of yellow glare
0 minutes of green glare

Assumptions

"Green" glare is glare with low potential to cause an after-image (flash blindness) when observed prior to a typical blink response time.

"Yellow" glare is glare with potential to cause an after-image (flash blindness) when observed prior to a typical blink response time.

Times associated with glare are denoted in Standard time. For Daylight Savings, add one hour.

Glare analyses do not account for physical obstructions between reflectors and receptors. This includes buildings, tree cover and geographic obstructions.

The glare hazard determination relies on several approximations including observer eye characteristics, angle of view, and typical blink response time. Actual values may differ.

Hazard zone boundaries shown in the Glare Hazard plot are an approximation and visual aid based on aggregated research data. Actual ocular impact outcomes encompass a continuous, not discrete, spectrum.

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ATTACHMENT D1

Agency Distribution List and Early Notification Letter

**FL Solar 4, LLC / Tallahassee International Airport Solar Project 2
Early Notification Letter Distribution List**

Agency	Contact Name	Location or Position	Mailing Address	Phone Number	Email	Initial Ltr. Sent Date
<i>Municipal/Local Agencies</i>						
City of Tallahassee Growth Management Department	Amelia Bryant	Southside Engineer	300 S Adams Street Box 28 Tallahassee FL 32301	850-891-7169	amelia.byrant2@talgov.com	7/13/2018
City of Tallahassee Growth Management Department	Craig Barkve	Special Projects Engineer	300 S Adams Street Box 28 Tallahassee FL 32301	850-891-7172	craig.barkve@talgov.com	7/13/2018
Leon County Department of Development Support and Environmental Management	David McDevitt	Director of Development Support and Environmental Management	435 N. Macomb St. 2nd Floor Tallahassee, FL 32301	850-606-1300	mcdevitt@leoncountyfl.gov	7/13/2018
<i>State Agencies</i>						
Florida Department of Environmental Protection	Tanya McHale	Section Supervisor	160 West Government Street Suite 308, Pensacola FL 32502	850-595-8300	Tanya.McHale@dep.state.fl.us	8/6/2018
Florida Division of Historical Resources	Timothy A. Parsons, Ph. D.	Compliance Review Supervisor	500 South Bronough St., Room 423 Tallahassee, FL 32399-0250	850-245-6300	timothy.parsons@dos.myflorida.com	7/13/2018
	Cory Lentz	Historic Sites Specialist		850-245-6333	mary.berman@dos.myflorida.com	
FDOT Aviation Division	Mike McClure	Aviation Environmental and Freight Manager	605 Suwannee Street, MS 46 Tallahassee 32399	850-414-4506	Mike.McClure@dot.state.fl.us	7/13/2018

**City of Tallahassee Solar Farm II at Tallahassee International Airport
Early Notification Letter Distribution List Cont'd.**

Agency	Contact Name	Location or Position	Mailing Address	Phone Number	Email	Initial Ltr. Sent Date
<i>State Agencies Cont'd.</i>						
Florida State Clearing House	Chris Stahl	State Clearinghouse Project Reviewer	Office of Intergovernmental Programs Department of Environmental Protection 2600 Blair Stone Rd. MS 47 Tallahassee, FL 32399-2400	850-717-9076	state.clearinghouse@dep.state.fl.us	7/13/2018
FDOT State Environmental Management Office	Joy Swanson-Pleas	Environmental Administrator	P.O. 607 1074 Highway 90 Chipley, FL 32428	850-330-1505	Joy.swansonpleas@dot.state.fl.us	7/13/2018
Florida Fish and Wildlife Conservation Commission	Jason Hight	Biological Administrator Northwest Region Office	Office of Conservation Planning Services 620 S. Meridian Street, MS5B5 Tallahassee, Florida 32399-1600	850-228-2055	jason.hight@myfwc.com	7/13/2018
	Ted Hoehn	Northwest Region Office			ted.hoehn@myfwc.com	7/13/2018
Northwest Florida Water Management District	Ken Greenwood	Environmental	3800 Commonwealth Blvd. MS LS225 Tallahassee FL 32399	850-921-2986	Ken.Greenwood@nfwwater.com	7/13/2018
	Lucinda Scott	Engineer P.E.,P.G.		850-921-2986	Lucinda.Scott@nfwwater.com	7/13/2018

**City of Tallahassee Solar Farm II at Tallahassee International Airport
Early Notification Letter Distribution List Cont'd.**

Agency	Contact Name	Location or Position	Mailing Address	Phone Number	Email	Initial Ltr. Sent Date
<i>Federal Agencies</i>						
U. S. Department of Agriculture - National Resource Conservation Service	Steve Tullar	District Conservationist (Jefferson, Leon, Wakulla Counties)	Monticello Service Center 1250 N Jefferson St. Monticello FL 32344	850-427-3062	steve.tullar@fl.usda.gov	7/13/2018
U.S. Fish and Wildlife Service	Dr. Catherine Phillips	Field Supervisor Panama City Ecological Services/Fish and Wildlife Conservation Office of Supervisors	1601 Balboa Avenue Panama City, FL 32405-3792	850-769-0552 Ext 242	catherine_phillips@fws.gov	7/13/2018
U.S. Fish and Wildlife Service	Harold Mitchell	Ecologist (Gopher tortoise, flatwoods salamander, Indigo Snake) Panama City Ecological Services/Fish & Wildlife Conservation Office		850-769-0552 x246	Harold_mitchell@fws.gov	7/13/2018

July x, 2018

Name
Title
Agency Name
Address 1
Address 2
Address 3

RE: Project Notification and Early Coordination
Environmental Assessment for the Proposed
City of Tallahassee Solar Farm 2 at Tallahassee International Airport

Dear _____:

This letter serves as notification of and early coordination for the Environmental Assessment (EA) for the City of Tallahassee's Proposed 40 MWac Solar Farm at Tallahassee International Airport (TLH), hereafter referred to as "Solar Farm 2".

Airport Background

TLH is located in Leon County, on the southwest side of Tallahassee, at 3300 Capital Circle SW. TLH is owned and operated by the City of Tallahassee. The Airport's existing facilities include two runways (RW):

- RW 18-36, which is 7,000 feet long and 150 feet wide, and
- RW 9-27, which is 8,000 feet long and 150 feet wide.

TLH focuses primarily on providing facilities for commercial airline service and operation of larger general aviation aircraft as well as providing for military and air cargo aircraft operations.

Proposed Project Purpose and Need

The City of Tallahassee is proposing the construction of Solar Farm 2 as a 40 MWac solar farm to generate clean energy, increase energy independence, and decrease the reliance on electricity generated by natural gas power plants. The Proposed Project is necessary to increase economic contribution from non-aviation uses on Airport property, support

economic and sustainable development at the Airport, contribute to the Airport's economic diversification, and to reduce the City of Tallahassee's carbon footprint.

Project Description

The Proposed Project includes the construction of the solar farm on several parcels totaling approximately 317-acres that is located west of Runway 18-36 and Capital Circle SW (refer to **Figure 1 - Project Area**). Three new utility poles for the distribution line will be installed near the southwest corner of the project area (refer to inset) within the existing utility easement and Right-of-Way. The existing utility easement contains electric power poles and is regularly mowed. The EA will describe and evaluate the consequences to the human and natural environment that may result from the Proposed Project. It will detail the direct, indirect, and cumulative impact that may be associated with the construction of the Proposed Project. The EA is being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969; FAA Order 1050.1F (as amended), *Environmental Impacts: Policies and Procedures*; FAA Order 5050.4B (as amended) *National Environmental Policy Act Implementing Instructions for Airport Actions*; and the Council on Environmental Quality's *Regulations for Implementing the Procedural Provisions of NEPA* (40 Code of Federal Regulations Parts 1500–1508).

A copy of the Draft EA will be provided to your agency during the public and agency review period in a few months.

On behalf of the City of Tallahassee and Tallahassee International Airport, we respectfully request any information or comments that you can provide on the Proposed Project area.

Sincerely,

Michael Baker International, Inc.



Mariben Espiritu Andersen
Project Manager/Senior Associate

Enclosure: Figure 1 - Project Area



- Project Area
- New Utility Pole for Tap



**PROJECT AREA
CITY OF TALLAHASSEE
SOLAR FARM 2**

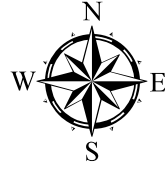
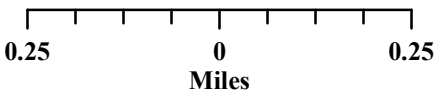


Figure 1



ATTACHMENT D2

Federal Agency Correspondence

*U.S. Department of Agriculture –
National Forest Service
Correspondence*



File Code: 1910
Date: March 14, 2019

Mariben Anderson
Department Manager
Michael Baker International

Dear Miss Anderson,

On October 24, 2018 the Apalachicola National Forest (ANF) received a request for comments regarding the construction of a second solar farm within Tallahassee International Airport property. The project will be implemented by the City of Tallahassee (COT) and is to consist of the installation of solar panels on 317 acres and three new utility poles located in an existing easement and Right-of-Way. The request for comments was routed to staff members of the ANF to gauge the potential impacts to various resource areas.

The ANF's primary concern is the location of the proposed three utility poles and their proximity to forest service land. The ANF implements an aggressive prescribed fire program that includes burning of the area surrounding the airport on a 2 to 3-year rotation. The proposed placement of the utility poles would result in additional mitigation measures to be taken by the ANF before prescribed fire activities. The ANF recommends an alternative location for these poles in the area directly adjacent to the proposed location. If this is unfeasible the ANF requests that the area around the proposed new utility poles be mowed on a frequent basis. This would alleviate the need for the ANF to prep around the poles prior to a burn.

In addition, the ANF would recommend that the City of Tallahassee create a plow line around the solar farm to protect the area in the event that a prescribed fire spots over onto airport property. In all other aspects the proposed activities are not likely to affect forest activities and operations. Thank you in advance for your consideration of our comments.

Sincerely,

Clint Davis

District Ranger



Andersen, Mariben

From: Tolver, Branden -FS <btolver02@fs.fed.us>
Sent: Thursday, March 14, 2019 12:16 PM
To: Andersen, Mariben
Subject: EXTERNAL: RE: URGENT FL Solar 4, LLC/Tallahassee Int'l Airport Solar Project 2 - Nat'l Forest Service Letter PLEASE
Attachments: COT solar farm 2 project.pdf

Mariben,
Attached is the ANF's comments on the upcoming solar farm project.



Branden Tolver
NEPA Coordinator
Forest Service
National Forests in Florida, Wakulla and Apalachicola Ranger Districts

p: 850-926-3561 x6525
f: 850-926-1904
branden.tolver@usda.gov

57 Taff Drive
Crawfordville, FL 32327
www.fs.fed.us



Caring for the land and serving people

From: Andersen, Mariben <MAnderesen@mbakerintl.com>
Sent: Wednesday, March 13, 2019 7:19 PM
To: Tolver, Branden -FS <btolver02@fs.fed.us>
Subject: URGENT FL Solar 4, LLC/Tallahassee Int'l Airport Solar Project 2 - Nat'l Forest Service Letter PLEASE

Hello Branden – for one reason or another we still have not received response from you regarding this Proposed Project's potential effect to the Apalachicola National Forest. We recently received the FAA's comments and would great appreciate a letter from you on a determination that the project will not affect or not likely affect national forest activities and operations. We really need your help as we need to get an FAA record of decision in April.

Mariben Andersen | Department Manager - Environmental
4211 W Boy Scout Blvd. Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakerial.com | [f](#) [t](#) [@](#) [in](#) [v](#)

Michael Baker

INTERNATIONAL

From: Andersen, Mariben
Sent: Wednesday, January 02, 2019 2:06 PM
To: 'Tolver, Branden -FS' <btolver02@fs.fed.us>
Cc: Serles, Randall <Randall.Serles@talgov.com>; Cowart, Ben <Ben.Cowart@talgov.com>; Wetherell, Alisha

(Alisha.Wetherell@talgov.com) <Alisha.Wetherell@talgov.com>; Gable, Jay <jgable@mbakerintl.com>

Subject: FL Solar 4, LLC/Tallahassee Int'l Airport Solar Project 2 - Nat'l Park Service Response to Comments

Hello Branden – I hope you had a good holiday. Please see the response to Mr. Allen Smith's comments regarding the power poles below. On behalf of the City of Tallahassee, we would also like to inform you that there will be a 10-12 foot access road on the side of the proposed project that is adjacent to Apalachicola National Forest which would also serve as a buffer or plow line per Mr. Steve Parrish's comment in the email string below. I am also following up on the formal response letter from you. It would be great if we can receive it by Friday noon, if possible so we can attach it to the preliminary draft EA.

Thank you and Happy New Year!

From: Serles, Randall

Sent: Thursday, December 06, 2018 1:32 PM

To: Cowart, Ben <Ben.Cowart@talgov.com>

Subject: RE: TLH Solar Project 2 - National Forest Service Response

Question: Allen Smith (Deputy District Ranger) – Placement of power poles need to be on the other side of the transmission ROW to reduce impacts to the burning program.

COT Response: COT's preference was to locate the new structures either directly underneath the existing conductors or to the east of the existing conductors as well. However, an iterative engineering design process that is subject to National Electric Safety Code and reliability operating requirements has dictated otherwise.

The new three pole structure is located to the west of the existing transmission line, instead of directly underneath, to minimize the installation outage impact on a critical 230KV transmission line interconnection with Duke Energy and satisfy National Electric Safety Code (NESC) requirements (minimal clearance between new transmission structure and existing transmission line). The middle pole of the three pole structure is required to be 78 ft tall because the new shield wire could not be located between the new and existing transmission lines and still satisfy NESC code requirements. Thus, the new shield wire had to be located so it would go over the existing transmission line; thus the reason why it is 78 ft tall. Locating this tall structure within the existing transmission line corridor would result in a NESC code violation since there is not adequate room to locate a 78 ft tall structure between the existing transmission wires. A similar code violation would occur if the new three pole structure was shifted to the east; as there is not enough clearance between the existing transmission line and the new poles.

Paul A. DeFrank, C.P.M
Transmission Projects Manager
City of Tallahassee
Electric Utility

Respectfully,

Mariben Espiritu Andersen
4211 West Boy Scout Road, Suite 500 | Tampa | FL | 33607
[O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakertnl.com

From: Tolver, Branden -FS <btolver02@fs.fed.us>

Sent: Wednesday, December 05, 2018 9:15 AM

To: Andersen, Mariben <MAnderesen@mbakerintl.com>

Subject: RE: EXTERNAL: RE: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Would you like an official letter for your documentation?

From: Andersen, Mariben [<mailto:MAnderesen@mbakerintl.com>]

Sent: Tuesday, December 04, 2018 4:46 PM

To: Tolver, Branden -FS <btolver02@fs.fed.us>

Subject: RE: EXTERNAL: RE: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Thank you very much Branden. Happy Holidays!

Respectfully,

Mariben

From: Tolver, Branden -FS <btolver02@fs.fed.us>

Sent: Tuesday, December 04, 2018 2:44 PM

To: Andersen, Mariben <MAnderesen@mbakerintl.com>

Subject: EXTERNAL: RE: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Mariben,

I have routed the proposed project to our staff here on the forest. They responded with the following comments:

Ace Haddock (Silviculturist) - I don't have a problem with this as long as they are OK with ash from prescribed fires falling on the panels, and our trees potentially casting shadows. I would like to know why the proposed power poles need to be on that side of the ROW. It would probably mean cutting more of our trees, and having to protect them during a burn. If the power poles were on the airport side of the ROW, or even on the airport property it would save us a lot of hassle.

Sonja Durrwachter (Timber Management Assistant) - If the utility poles are in the mowed area of the right of way, timber has no concerns with this project.

Allen Smith (Deputy District Ranger) – Placement of power poles need to be on the other side of the transmission ROW to reduce impacts to the burning program.

Steve Parrish (Fire Management Officer) – Recommends that a plow line be placed around the panels on COT property in case of prescribed fire spot over.

From: Andersen, Mariben [<mailto:MAnderesen@mbakerintl.com>]

Sent: Friday, October 26, 2018 9:35 AM

To: Tolver, Branden -FS <btolver02@fs.fed.us>

Subject: FW: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Respectfully,

Mariben

From: Andersen, Mariben
Sent: Wednesday, October 24, 2018 2:47 PM
To: Branden Tolver (btover02@fs.fed.us) <btover02@fs.fed.us>
Cc: Jerry Emerick (jemerick@fs.fed.us) <jemerick@fs.fed.us>
Subject: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Good afternoon Mr. Tolver –
Mr. Emerick provided me with your contact information yesterday. I am sending you the attached project notification letter on behalf of Tallahassee Electric and Tallahassee International Airport regarding their Solar Farm 2 project. The proposed project is located on airport property but is adjacent to the Apalachicola National Forest (please see the attached project location map).

Please contact me if you have any questions. Thank you and Happy Halloween.

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakerial.com



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Andersen, Mariben

From: Tolver, Branden -FS <btolver02@fs.fed.us>
Sent: Tuesday, December 04, 2018 2:44 PM
To: Andersen, Mariben
Subject: EXTERNAL: RE: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Mariben,

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Steve Parrish (Fire Management Officer) – Recommends that a plow line be placed around the panels on COT property in case of prescribed fire spot over.

From: Andersen, Mariben [mailto:MAndersen@mbakerintl.com]
Sent: Friday, October 26, 2018 9:35 AM
To: Tolver, Branden -FS <btolver02@fs.fed.us>
Subject: FW: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Respectfully,

Mariben

From: Andersen, Mariben
Sent: Wednesday, October 24, 2018 2:47 PM
To: Branden Tolver (btover02@fs.fed.us) <btover02@fs.fed.us>
Cc: Jerry Emerick (jemerick@fs.fed.us) <jemerick@fs.fed.us>
Subject: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

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Please contact me if you have any questions. Thank you and Happy Halloween.

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakerial.com



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*U.S. Department of Agriculture –
National Resource Conservation Service
Correspondence*

Gable, Jay

From: Crockett, Leroy - NRCS, Quincy, FL <Leroy.Crockett@fl.usda.gov>
Sent: Monday, January 28, 2019 12:51 PM
To: Gable, Jay
Subject: RE: EXTERNAL: FW: Farmland Impact analysis for proposed solar farm 2 at Tallahassee International Airport
Attachments: AD_1006.pdf

Attached is the completed AD_1006. Since there are no prime farmlands located in this project was able to check no and not need to calculate anything else.

Sorry for the delay.

Good luck with the project.

Sincerely,

LeRoy Crockett
Resource Soil Scientist

Perry Paige Bld suite 305N
1740 S MLK Blvd
Tallahassee, FL 32307
Mb: (352) 262-0192



[Watch](#) the "Mighty Mini Microbe" trailer.

From: Gable, Jay <JGable@mbakerintl.com>
Sent: Wednesday, January 16, 2019 9:03 AM
To: Crockett, Leroy - NRCS, Quincy, FL <Leroy.Crockett@fl.usda.gov>
Subject: RE: EXTERNAL: FW: Farmland Impact analysis for proposed solar farm 2 at Tallahassee International Airport

Mr. Crockett,
The requested files are attached.

Thank you for your assistance. Should I send all of these requests directly to you in the future?

Sincerely,

Jay Gable | Environmental Specialist | Michael Baker International
4211 West Boy Scout Blvd, Suite 500 | Tampa, FL 33607 | 813-889-3892
jgable@mbakerintl.com



From: Crockett, Leroy - NRCS, Quincy, FL <Leroy.Crockett@fl.usda.gov>
Sent: Wednesday, January 16, 2019 8:11 AM
To: Gable, Jay <jgable@mbakerintl.com>
Subject: EXTERNAL: FW: Farmland Impact analysis for proposed solar farm 2 at Tallahassee International Airport

Good Morning.

Please send me either shp files to use in ArcGIS or a kml file to use in google earth to check acreages and complete assessment.

Also see attached the AD-1006. I fill out parts II,IV and V. Will need the initial information about the project on this form to track.

Please contact me with any questions.

Sincerely,

LeRoy Crockett
Resource Soil Scientist

Perry Paige Bld suite 305N
1740 S MLK Blvd
Tallahassee, FL 32307
Mb: (352) 262-0192



[Watch](#) the "Mighty Mini Microbe" trailer.

From: Gable, Jay <JGable@mbakerintl.com>
Sent: Tuesday, January 8, 2019 2:52 PM
To: Robbins, Rick - NRCS, Gainesville, FL <rick.a.robbins@fl.usda.gov>

Cc: Andersen, Mariben <MAnderesen@mbakerintl.com>

Subject: Farmland Impact analysis for proposed solar farm 2 at Tallahassee International Airport

Dear Mr. Robbins,

I am emailing regarding a proposed project at Tallahassee International Airport (TLH) to build a new solar farm on the west side of the existing airfield on airport property. This will be the second solar farm at TLH.

We are in the process of drafting an Environmental Assessment for the proposed project to satisfy National Environmental Policy Act requirements. I used NRCS GIS soil data and determined that no prime, unique or state important farmland soils occur within the limits of the proposed project. I've attached a map depicting the boundary of the proposed project overlaid with the soils data.

Given that there are no farmland soils in the limits of the proposed project, is there anything additional that we need to do to satisfy the requirements of the Farmland Protection Policy Act for our Environmental Assessment?

Thank you,

Jay Gable | Environmental Specialist | Michael Baker International
4211 West Boy Scout Blvd, Suite 500 | Tampa, FL 33607 | 813-889-3892
jgable@mbakerintl.com



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FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request			
Name of Project		Federal Agency Involved			
Proposed Land Use		County and State			
PART II (To be completed by NRCS)		Date Request Received By NRCS		Person Completing Form:	
Does the site contain Prime, Unique, Statewide or Local Important Farmland? <i>(If no, the FPPA does not apply - do not complete additional parts of this form)</i>		YES <input type="checkbox"/>	NO <input type="checkbox"/>	Acres Irrigated	Average Farm Size
Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %		Amount of Farmland As Defined in FPPA Acres: %		
Name of Land Evaluation System Used	Name of State or Local Site Assessment System		Date Land Evaluation Returned by NRCS		
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly					
B. Total Acres To Be Converted Indirectly					
C. Total Acres In Site					
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland					
B. Total Acres Statewide Important or Local Important Farmland					
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted					
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value					
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)					
PART VI (To be completed by Federal Agency) Site Assessment Criteria <i>(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)</i>		Maximum Points	Site A	Site B	Site C
1. Area In Non-urban Use		(15)			
2. Perimeter In Non-urban Use		(10)			
3. Percent Of Site Being Farmed		(20)			
4. Protection Provided By State and Local Government		(20)			
5. Distance From Urban Built-up Area		(15)			
6. Distance To Urban Support Services		(15)			
7. Size Of Present Farm Unit Compared To Average		(10)			
8. Creation Of Non-farmable Farmland		(10)			
9. Availability Of Farm Support Services		(5)			
10. On-Farm Investments		(20)			
11. Effects Of Conversion On Farm Support Services		(10)			
12. Compatibility With Existing Agricultural Use		(10)			
TOTAL SITE ASSESSMENT POINTS		160			
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100			
Total Site Assessment (From Part VI above or local site assessment)		160			
TOTAL POINTS (Total of above 2 lines)		260			
Site Selected:	Date Of Selection	Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>			
Reason For Selection:					
Name of Federal agency representative completing this form:					Date:

(See Instructions on reverse side)

*U.S. Fish and Wildlife Service
Correspondence*



United States Department of the Interior

U. S. FISH AND WILDLIFE SERVICE

7915 BAYMEADOWS WAY, SUITE 200
JACKSONVILLE, FLORIDA 32256-7517

IN REPLY REFER TO:

August 13, 2013

Colonel Alan M. Dodd, District Engineer
Department of the Army
Jacksonville District Corps of Engineers
P.O Box 4970
Jacksonville, Florida 32232-0019
(Attn: Mr. David S. Hobbie)

RE: Update Addendum to USFWS Concurrence Letter to U.S. Army Corps of Engineers
Regarding Use of the Attached Eastern Indigo Snake Programmatic Effect Determination Key

Dear Colonel Dodd:

This letter is to amend the January 25, 2010, letter to the U.S. Army Corps of Engineers regarding the use of the attached eastern indigo snake programmatic effect determination key (key). It supersedes the update addendum issued January 5, 2012.

We have evaluated the original programmatic concurrence and find it suitable and appropriate to extend its use to the remainder of Florida covered by the Panama City Ecological Services Office.

On Page 2

The following replaces the last paragraph above the signatures:

“Thank you for your continued cooperation in the effort to conserve fish and wildlife resources. Any questions or comments should be directed to Annie Dziergowski (North Florida ESO) at 904-731-3089, Harold Mitchell (Panama City ESO) at 850-769-0552, or Victoria Foster (South Florida ESO) at 772-469-4269.”

On Page 3

The following replaces both paragraphs under “Scope of the key”:

“This key should be used only in the review of permit applications for effects determinations for the eastern indigo snake within the State of Florida, and not for other listed species or for aquatic resources such as Essential Fish Habitat (EFH).”

On Page 4

The following replaces the first paragraph under Conservation Measures:

“The Service routinely concurs with the Corps’ “not likely to adversely affect” (NLAA) determination for individual project effects to the eastern indigo snake when assurances are given that

our *Standard Protection Measures for the Eastern Indigo Snake* (Service 2013) located at: <http://www.fws.gov/northflorida/IndigoSnakes/indigo-snakes.htm> will be used during project site preparation and project construction. There is no designated critical habitat for the eastern indigo snake.”

On Page 4 and Page 5 (Couplet D)

The following replaces D. under Conservation Measures:

D. The project will impact less than 25 acres of xeric habitat (scrub, sandhill, or scrubby flatwoods) or less than 25 active and inactive gopher tortoise burrows.....go to E

The project will impact more than 25 acres of xeric habitat (scrub, sandhill, or scrubby flatwoods) or more than 25 active and inactive gopher tortoise burrows and consultation with the Service is requested²..... "may affect"

On Page 5

The following replaces footnote #3:

“³If excavating potentially occupied burrows, active or inactive, individuals must first obtain state authorization via a FWC Authorized Gopher Tortoise Agent permit. The excavation method selected should also minimize the potential for injury of an indigo snake. Applicants should follow the excavation guidance provided within the most current Gopher Tortoise Permitting Guidelines found at <http://myfwc.com/gophertortoise> .”

Thank you for making these amendments concerning the Eastern Indigo Snake Key. If you have any questions, please contact Jodie Smithem of my staff at the address on the letterhead, by email at jodie_smithem@fws.gov, or by calling (904)731-3134.

Sincerely,


Dawn Jennings
Acting Field Supervisor

cc:
Panama City Ecological Services Field Office, Panama City, FL
South Florida Ecological Services Field Office, Vero Beach, FL



United States Department of the Interior



FISH AND WILDLIFE SERVICE
South Florida Ecological Services Office
1339 20th Street
Vero Beach, Florida 32960

January 25, 2010

David S. Hobbie
Chief, Regulatory Division
U.S. Army Corps of Engineers
Post Office Box 4970
Jacksonville, Florida 32232-0019

Service Federal Activity Code: 41420-2009-FA-0642

Service Consultation Code: 41420-2009-I-0467

41910-2010-I-0045

Subject: North and South Florida
Ecological Services Field Offices
Programmatic Concurrence for Use
of Original Eastern Indigo Snake
Key(s) Until Further Notice

Dear Mr. Hobbie:

The U.S. Fish and Wildlife Service's (Service) South and North Florida Ecological Services Field Offices (FO), through consultation with the U.S. Army Corps of Engineers Jacksonville District (Corps), propose revision to both Programmatic concurrence letters/keys for the federally threatened Eastern Indigo Snake (*Drymarchon corais couperi*), (indigo snake), and now provide one key for both FO's. The original programmatic key was issued by the South Florida FO on November 9, 2007. The North Florida FO issued a revised version of the original key on September 18, 2008. Both keys were similar in content, but reflected differences in geographic work areas between the two Field Offices. The enclosed key satisfies each office's responsibilities under the Endangered Species Act of 1973, as amended (Act) (87 Stat. 884; 16 U.S.C.1531 *et seq.*).

Footnote number 3 in the original keys indicated "A member of the excavation team should be authorized for Incidental Take during excavation through either a section 10(a)(1)(A) permit issued by the Service or an incidental take permit issued by the Florida Fish and Wildlife Conservation Commission (FWC)." We have removed this reference to a Service issued Section 10(a)(1)(A) permit, as one is not necessary for this activity. We also referenced the FWC's revised April 2009 Gopher Tortoise Permitting Guidelines with a link to their website for updated excavation guidance, and have provided a website link to our Standard Protection Measures. All other conditions and criteria apply.

We believe the implementation of the attached key achieves our mutual goal for all users to make consistent effect determinations regarding this species. The use of this key for review of projects

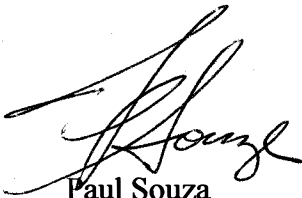
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IN AMERICA 

located in all referenced counties in our respective geographic work areas leads the Service to concur with the Corps' determination of "may affect, not likely to adversely affect" (MANLAA) for the Eastern indigo snake. The biological rationale for the determinations is contained within the referenced documents and is submitted in accordance with section 7 of the Act.

Should circumstances change or new information become available regarding the eastern indigo snake or implementation of the key, the determinations may be reconsidered as deemed necessary.

Thank you for your continued cooperation in the effort to conserve fish and wildlife resources. Any questions or comments should be directed to either Allen Webb (Vero Beach) at 772-562-3909, extension 246, or Jay Herrington (Jacksonville) at 904-731-3326.

Sincerely,



Paul Souza
Field Supervisor
South Florida Ecological Services Office



David L. Hankla
Field Supervisor
North Florida Ecological Services Office

Enclosure

cc: electronic only
FWC, Tallahassee, Florida (Dr. Elsa Haubold)
Service, Jacksonville, Florida (Jay Herrington)
Service, Vero Beach, Florida (Sandra Sneckenberger)

Eastern Indigo Snake Programmatic Effect Determination Key

Scope of the key

This key should be used only in the review of permit applications for effects determinations within the North and South Florida Ecological Services Field Offices Geographic Areas of Responsibility (GAR), and not for other listed species or for aquatic resources such as Essential Fish Habitat (EFH). Counties within the North Florida GAR include Alachua, Baker, Bradford, Brevard, Citrus, Clay, Columbia, Dixie, Duval, Flagler, Gilchrist, Hamilton, Hernando, Hillsborough, Lafayette, Lake, Levy, Madison, Manatee, Marion, Nassau, Orange, Pasco, Pinellas, Putnam, St. Johns, Seminole, Sumter, Suwannee, Taylor, Union, and Volusia.

Counties in the South Florida GAR include Broward, Charlotte, Collier, De Soto, Glades, Hardee, Hendry, Highlands, Lee, Indian River, Martin, Miami-Dade, Monroe, Okeechobee, Osceola, Palm Beach, Polk, Sarasota, St. Lucie.

Habitat

Over most of its range, the eastern indigo snake frequents several habitat types, including pine flatwoods, scrubby flatwoods, high pine, dry prairie, tropical hardwood hammocks, edges of freshwater marshes, agricultural fields, coastal dunes, and human-altered habitats (Service 1999). Eastern indigo snakes appear to need a mosaic of habitats to complete their life cycle. Wherever the eastern indigo snake occurs in xeric habitats, it is closely associated with the gopher tortoise (*Gopherus polyphemus*), the burrows of which provide shelter from winter cold and summer desiccation (Speake et al. 1978; Layne and Steiner 1996). Interspersion of tortoise-inhabited uplands and wetlands improves habitat quality for this species (Landers and Speake 1980; Auffenberg and Franz 1982).

In south Florida, agricultural sites, such as sugar cane fields, created in former wetland areas are occupied by eastern indigo snakes (Enge pers. comm. 2007). Formerly, indigo snakes would have only occupied higher elevation sites within the wetlands. The introduction of agriculture and its associated canal systems has resulted in an increase in rodents and other species of snakes that are prey for eastern indigo snakes. The result is that indigos occur at higher densities in these areas than they did historically.

Even though thermal stress may not be a limiting factor throughout the year in south Florida, indigo snakes still seek and use underground refugia. On the sandy central ridge of central Florida, eastern indigos use gopher tortoise burrows more (62 percent) than other underground refugia (Layne and Steiner 1996). Other underground refugia used include armadillo (*Dasypus novemcinctus*) burrows near citrus groves, cotton rat (*Sigmodon hispidus*) burrows, and land crab (*Cardisoma guanhum*) burrows in coastal areas (Service 2006). Natural ground holes, hollows at the base of trees or shrubs, ground litter, trash piles, and crevices of rock-lined ditch walls are also used (Layne and Steiner 1996). These refugia are used most frequently where tortoise burrows are not available, principally in low-lying areas off the central and coastal ridges. In extreme south Florida (the Everglades and Florida Keys), indigo snakes are found in tropical

hardwood hammocks, pine rocklands, freshwater marshes, abandoned agricultural land, coastal prairie, mangrove swamps, and human-altered habitats (Steiner et al. 1983). It is suspected that they prefer hammocks and pine forests, because most observations occur in these habitats disproportionately to their presence in the landscape (Steiner et al. 1983). Hammocks may be important breeding areas as juveniles are typically found there. The eastern indigo snake is a snake-eater so the presence of other snake species may be a good indicator of habitat quality.

Conservation Measures

The Service routinely concurs with the Corps' "not likely to adversely affect" (NLAA) determination for individual project effects to the eastern indigo snake when assurances are given that our *Standard Protection Measures for the Eastern Indigo Snake* (Service 2004) located at: <http://www.fws.gov/northflorida/IndigoSnakes/indigo-snakes> will be used during project site preparation and project construction. There is no designated critical habitat for the eastern indigo snake.

In an effort to reduce correspondence in effect determinations and responses, the Service is providing an Eastern Indigo Snake Effect Determination Key, similar in utility to the West Indian Manatee Effect Determination Key and the Wood Stork Effect Determination Keys presently being utilized by the Corps. If the use of this key results in a Corps' determination of "no effect" for a particular project, the Service supports this determination. If the use of this Key results in a determination of NLAA, the Service concurs with this determination and no additional correspondence will be necessary¹. This key is subject to revisitation as the Corps and Service deem necessary.

Highlighted key applies to the Proposed Project - FL Solar 4, LLC/TLH Solar Project 2

A. Project is not located in open water or salt marsh.....go to B

Project is located solely in open water or salt marsh..... "no effect"

B. Permit will be conditioned for use of the Service's *Standard Protection Measures For The Eastern Indigo Snake* during site preparation and project construction.....go to C

Permit will not be conditioned as above for the eastern indigo snake, or it is not known whether an applicant intends to use these measures and consultation with the Service is requested² "may affect"

C. There are gopher tortoise burrows, holes, cavities, or other refugia where a snake could be buried or trapped and injured during project activitiesgo to D

There are no gopher tortoise burrows, holes, cavities, or other refugia where a snake could be buried or trapped and injured during project activities "NLAA"

D. The project will impact less than 25 acres of xeric habitat supporting less than 25 active and inactive gopher tortoise burrows.....go to E

The project will impact more than 25 acres of xeric habitat or more than 25 active and inactive gopher tortoise burrows and consultation with the Service is requested²..... "may affect"

- E. Any permit will be conditioned such that all gopher tortoise burrows, active or inactive, will be evacuated prior to site manipulation in the vicinity of the burrow³. If an indigo snake is encountered, the snake must be allowed to vacate the area prior to additional site manipulation in the vicinity. Any permit will also be conditioned such that holes, cavities, and snake refugia other than gopher tortoise burrows will be inspected each morning before planned site manipulation of a particular area, and, if occupied by an indigo snake, no work will commence until the snake has vacated the vicinity of proposed work..... "NLAA"

Permit will not be conditioned as outlined above and consultation with the Service is requested² "may affect"

¹With an outcome of "no effect" or "NLAA" as outlined in this key, the requirements of section 7 of the Act are fulfilled for the eastern indigo snake and no further action is required.

²Consultation may be concluded informally or formally depending on project impacts.

³ If burrow excavation is utilized, it should be performed by experienced personnel. The method used should minimize the potential for injury of an indigo snake. Applicants should follow the excavation guidance provided within the Florida Fish and Wildlife Conservation Commission's revised April 2009 Gopher Tortoise Permitting Guidelines located at http://myfwc.com/License/Permits_ProtectedWildlife.htm#gophertortoise. A member of the excavation team should be authorized for Incidental Take during excavation through an incidental take permit issued by the Florida Fish and Wildlife Conservation Commission.

Andersen, Mariben

From: Ackley, Jeffrey <jeffrey_ackley@fws.gov>
Sent: Monday, July 16, 2018 10:39 AM
To: Andersen, Mariben
Subject: EXTERNAL: Re: [EXTERNAL] City of Tallahassee Solar Farm 2 EA at Tallahassee Int'l Airport - Gopher Tortoise Impacts

Hi Mariben,

Looking down at the beginning of the chain, you wanted some form of coordination with us? We haven't listed the tortoise federally (yet), so unless the project has a federal connection (licence/permit/land/funding) and another federally listed species involved, you should only need to coordinate with state wildlife agencies. My only concern would be in the extremely unlikely event you see an indigo snake in one of the tortoise burrows, you would need to stop work and contact us.

Jeff

Dr. Jeffrey W. Ackley, Ecologist
U.S. Fish & Wildlife Service
1601 Balboa Avenue, Panama City, FL 32405
office phone: 850-769-0552 #226

On Fri, Jul 13, 2018 at 3:57 PM, Andersen, Mariben <MAnderesen@mbakerintl.com> wrote:

Hello Jeff –

The proposed project has gopher tortoise impacts (see attached map). Appropriate permits from City of Tallahassee and FWC will be acquired and the gopher tortoises would be relocated to the permitted FWC recipient site below.

Apalachicola National Forest Gopher Tortoise Research Site

U.S. Department of Agriculture Forest Service

325 John Know Road, Suite F-100, Tallahassee, FL 32303

FWC Permit No. GTR-10-00001A

Location is 30,3775, -84.336438883

The propose project does not have wetland impacts.

Respectfully,

Maríben

From: Sean Blomquist [mailto:sean_blomquist@fws.gov]

Sent: Friday, July 13, 2018 4:40 PM

To: Jeffrey Ackley <jeffrey_ackley@fws.gov>

Cc: Andersen, Mariben <MAndersen@mbakerintl.com>; Harold Mitchell <Harold_Mitchell@fws.gov>

Subject: EXTERNAL: Fwd: [EXTERNAL] FW: City of Tallahassee Solar Farm 2 EA at Tallahassee Int'l Airport - Project Notification Letter

Jeff,

Please work with Mariben on this project.

Thanks,

Sean M. Blomquist, Ph.D., CWB

Deputy Field Supervisor

Panama City Ecological Services Field Office

U.S. Fish and Wildlife Service

1601 Balboa Avenue, Panama City, FL 32405

Office: 850-769-0552 ext. 233

Cell: 850-890-8308

Fax: 850-763-2177

<http://www.fws.gov/panamacity/>

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----- Forwarded message -----

From: Andersen, Mariben <MAnderesen@mbakerintl.com>
Date: Fri, Jul 13, 2018 at 12:04 PM
Subject: [EXTERNAL] FW: City of Tallahassee Solar Farm 2 EA at Tallahassee Int'l Airport - Project Notification Letter
To: Sean_blomquist@fws.gov <Sean_blomquist@fws.gov>
Cc: Harold_mitchell@fws.gov <Harold_mitchell@fws.gov>

Hello Sean – I do not know how long Catherine is going to be out so I am forwarding the letter to you. The project is not urgent but we would like to receive a response within 30 days, if possible. Thank you for your help.

Respectfully,

Mariben

From: Andersen, Mariben
Sent: Friday, July 13, 2018 12:55 PM
To: catherine_phillips@fws.gov
Cc: Harold_mitchell@fws.gov
Subject: City of Tallahassee Solar Farm 2 EA at Tallahassee Int'l Airport - Project Notification Letter

Dear Dr. Phillips -

On behalf of the City of Tallahassee Electric and Tallahassee International Airport, Michael Baker International Inc. is sending the attached Solar Farm 2 Environmental Assessment (EA) Project Notification Letter to inform you about the proposed project and initiate coordination. If you have any information or concerns about the proposed project, please feel free to contact me. Thank you!

Andersen, Mariben

From: Dziergowski, Annie <annie_dziergowski@fws.gov>
Sent: Wednesday, October 31, 2018 9:02 AM
To: Andersen, Mariben
Subject: EXTERNAL: City of Tallahassee Solar Farm

Mariben,

We have received your letter regarding this project and don't have any comments at this time. Please provide us with the draft EA once it is available for our review.

Thanks,
Annie

Annie Dziergowski, Project Consultation Supervisor
U.S. Fish and Wildlife Service
Email: annie_dziergowski@fws.gov
7915 Baymeadows Way, Suite 200
Jacksonville, FL 32256-7517
904.731.3089 (direct)
904.731.3336 (main)
904.731.3045 or 3048 (fax)
<http://www.fws.gov/northflorida>

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ATTACHMENT D3

State Agency Correspondence



Florida Department of Environmental Protection Correspondence

Andersen, Mariben

From: McHale, Tanya <Tanya.McHale@dep.state.fl.us>
Sent: Monday, August 06, 2018 3:48 PM
To: Andersen, Mariben
Subject: EXTERNAL: RE: COT 40MWac Solar Farm II @ TLH - Project Notification and Early Coordination Letter

Hi Mariben,

Nice to hear from you!! This project may require an ERP permit if there will be any new access roads or if the solar panels are installed on a impervious base. We have previously issued one permit to TIA for a Solar Farm. You can find the permitting information at the link below.

Thanks!

[https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=hitlist&\[freeText=\]&\[folderName=\]&\[profile=Administrative%2BConstruction_Operation+Mgmt%2BDiscovery_Compliance%2BEnforcement_Legal%2BFiscal%2BPermitting_Authorization%2BPlans+and+Specifications%2BSampling\]&\[creator=\]&\[entityType=any\]&\[createdDateTo=\]&\[catalog=23\]&\[searchBy=Profile\]&\[sortBy=Received+Date\]&\[createdDate=\]&{County= EQ_LEON}&{District= EQ_NWD}&{Facility-Site+ID= EQ_ERP_352320}](https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=hitlist&[freeText=]&[folderName=]&[profile=Administrative%2BConstruction_Operation+Mgmt%2BDiscovery_Compliance%2BEnforcement_Legal%2BFiscal%2BPermitting_Authorization%2BPlans+and+Specifications%2BSampling]&[creator=]&[entityType=any]&[createdDateTo=]&[catalog=23]&[searchBy=Profile]&[sortBy=Received+Date]&[createdDate=]&{County= EQ_LEON}&{District= EQ_NWD}&{Facility-Site+ID= EQ_ERP_352320})

Tanya Alvarez McHale
850-595-0614

From: Andersen, Mariben [mailto:MAnderсен@mbakerintl.com]
Sent: Monday, August 6, 2018 1:20 PM
To: McHale, Tanya <Tanya.McHale@dep.state.fl.us>
Subject: COT 40MWac Solar Farm II @ TLH - Project Notification and Early Coordination Letter

Good afternoon Tanya –

Michael Baker International Inc. is sending the attached Solar Farm 2 Environmental Assessment (EA) Project Notification Letter on behalf of the City of Tallahassee Electric and Tallahassee International Airport to inform you about the proposed project and initiate coordination. Please note that the project is not anticipated to have wetland impacts (please refer to Figure 4 depicting the wetland and project area) . If you have any information or concerns about the proposed project, please feel free to contact me. Thank you!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakintl.com



*"Florida Department of Historic Resources
Correspondence"*

Andersen, Mariben

From: Rothrock, Lindsay S. <Lindsay.Rothrock@dos.myflorida.com>
Sent: Friday, March 15, 2019 12:24 PM
To: Andersen, Mariben
Cc: Lentz, Corey J.
Subject: EXTERNAL: Tallahassee International Airport - Solar Farm 2
Attachments: 2018-3498-B_TLHSolarFarm2_106_(ACI)FAA.PDF

Good afternoon,

Attached please find the comment letter for the following report:

Cultural Resource Assessment Survey of the City of Tallahassee Solar Farm 2 at Tallahassee International Airport, Leon County, Florida
and
Addendum, Cultural Resource Assessment Survey, Technical Memorandum, FL Solar 4, LLC/Tallahassee International Airport Solar Project 2, Leon County, Florida

If you have any questions please feel free to contact us. Have a great day!

Kind Regards,

Lindsay S. Rothrock, MA, RPA
Historic Preservationist / Archaeologist
Division of Historical Resources | Florida Department of State
500 South Bronough Street | Tallahassee, Florida 32399 | 850.245.6307 | 1.800.847.7278
Lindsay.Rothrock@DOS.MyFlorida.com | dos.myflorida.com/historical





FLORIDA DEPARTMENT of STATE

RON DESANTIS
Governor

LAUREL M. LEE
Secretary of State

Mariben Espiritu Andersen
Michael Baker International
4211 West Boy Scout Blvd., Suite 500
Tampa, Florida 33607

March 15, 2019

RE: DHR Project File No.: 2018-3498-B Received by DHR: February 22, 2019
Cultural Resource Assessment Survey of the City of Tallahassee Solar Farm 2 at Tallahassee International Airport, Leon County, Florida
Addendum, Cultural Resource Assessment Survey, Technical Memorandum, FL Solar 4, LLC/Tallahassee International Airport Solar Project 2, Leon County, Florida

Dear Ms. Andersen,

Our office received and reviewed the above referenced project for possible effects on historic properties listed, or eligible for listing, on the *National Register of Historic Places* (NRHP). The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and its implementing regulations in *36 CFR Part 800: Protection of Historic Properties*.

In May and December 2018, Archaeological Consultants, Inc., (ACI) conducted the above referenced cultural resource assessment survey (CRAS) on behalf of the City of Tallahassee. The project is subject to compliance with Federal Aviation Administration (FAA) and City of Tallahassee/Leon County's Natural Features Inventory requirements.

ACI investigated five (5) areas of potential effect (APE) during their investigations. They recorded one (1) archaeological occurrence (AO) which is NRHP-ineligible, and documented the absence of four (4) previously recorded sites (8LE0030, 8LE0641, 8LE1640, and 8LE6219) that overlap the various APEs. The SHPO previously determined sites 8LE0030, 8LE0641, and 8LE6219 are NRHP-ineligible and ACI concurs with maintaining that determination. Site 8LE1640 was not previously evaluated by the SHPO, and is recorded as a General Vicinity site. ACI recommends the portion of 8LE1640 in the APE as NRHP-ineligible. ACI concluded that the proposed project will have no effect on cultural resources listed, or eligible for listing, in the NRHP, and no additional work is warranted.

Based on the information provided, our office concurs with the NRHP determinations presented with the clarification that site 8LE1640 has insufficient information for a definitive NRHP determination at this time, but we note that the site is not present within the APE. As such, we concur that the proposed project will have no effect on historic properties listed, or eligible for listing, on the NRHP, and we find the submitted report and its addendum complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*. If I can be of any further help, or answer any questions about this letter, please contact me at Lindsay.Rothrock@dos.myflorida.com.

Sincerely,

Timothy A. Parsons, Ph.D.
Director, Division of Historical Resources
and State Historic Preservation Officer





FLORIDA DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

Mariben Espiritu Andersen
Sr. Associate/Env. Manager
Michael Baker International
4211 West Boy Scout Blvd., Suite 500
Tampa, Florida 33607

July 30, 2018

RE: DHR Project File No.: 2018-3498, Received by DHR: July 13, 2018
Project: *City of Tallahassee Sola Farm 2 at Tallahassee International Airport*
County: Leon

Ms. Andersen:

The Florida State Historic Preservation Officer reviewed the referenced project for possible effects on historic properties listed, or eligible for listing, in the *National Register of Historic Places*. The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and its implementing regulations in *36 CFR Part 800: Protection of Historic Properties*.

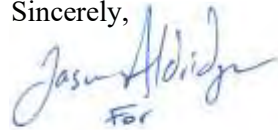
Based on the information provided, it is the opinion of this office that the proposed project will have no effect on historic properties listed, or eligible for listing, in the *National Register of Historic Places*. However, since the project includes ground disturbance activities the following special condition regarding unexpected discoveries should be included during project activities:

- If prehistoric or historic artifacts, such as pottery or ceramics, projectile points, dugout canoes, metal implements, historic building materials, or any other physical remains that could be associated with Native American, early European, or American settlement are encountered at any time within the project site area, the project shall cease all activities involving subsurface disturbance in the vicinity of the discovery. The applicant shall contact the Florida Department of State, Division of Historical Resources, Compliance Review Section at (850)-245-6333. Project activities shall not resume without verbal and/or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Section 872.05, Florida Statutes.

Mariben Espiritu Andersen
DHR Project File No.: 2018-3498
August 15, 2018
Page 2

If you have any questions, please contact Corey Lentz, Historic Sites Specialist, by email at Corey.Lentz@dos.myflorida.com, or by telephone at 850.245.6339 or 800.847.7278.

Sincerely,

A handwritten signature in blue ink that reads "Jason Aldridge". Below the signature, the word "For" is written in a smaller, lighter blue font.

Timothy A Parsons, Ph.D.
Director, Division of Historical Resources
& State Historic Preservation Officer

*Florida Department of Transportation
Correspondence*

Andersen, Mariben

From: Swanson Pleas, Joy <Joy.SwansonPleas@dot.state.fl.us>
Sent: Friday, July 13, 2018 3:43 PM
To: Andersen, Mariben
Subject: EXTERNAL: RE: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Thank you. I will forward to others and will get back to you if we have any comments.

Joy Swanson Pleas

Environmental Manager
850-330-1505

From: Andersen, Mariben [mailto:MAnderсен@mbakerintl.com]
Sent: Friday, July 13, 2018 10:50 AM
To: Swanson Pleas, Joy <Joy.SwansonPleas@dot.state.fl.us>
Subject: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Good morning Joy -

Michael Baker International Inc. is sending the attached Solar Farm 2 Environmental Assessment (EA) Project Notification Letter on behalf of the City of Tallahassee Electric and Tallahassee International Airport to inform you about the proposed project and initiate coordination. If you have any information or concerns about the proposed project, please feel free to contact me. Thank you!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakerintl.com



Andersen, Mariben

From: Jones, Greg <Greg.Jones@dot.state.fl.us>
Sent: Wednesday, August 08, 2018 4:36 PM
To: Andersen, Mariben
Cc: Parish, Nathan; Wetherell, Alisha (Alisha.Wetherell@talgov.com); Cowart, Ben
Subject: EXTERNAL: RE: City of Tallahassee Solar Farm Phase II EA @ TLH - Obstruction Coordination

As we discussed my concern is compliance with 14 CFR Part 77 and Chapter 333, Florida Statutes. Based on our conversation it is my understanding that Michael Baker will take whatever actions are necessary to comply with them. If you have any questions give me a call.

Greg Jones
Airspace and Land Use Manager
Aviation and Spaceports Office
Florida Department of Transportation
605 Suwannee Street, MS 46
Tallahassee, FL 32399-0450
Office 850-414-4502
Fax 850-414-4508
Greg.Jones@dot.state.fl.us
<http://www.fdot.gov/aviation>

AIRPORT ZONING REGULATION INFORMATION AND DOCUMENTS are found at the FDOT Aviation and Spaceports Office website above.

From: Andersen, Mariben [mailto:MAndersen@mbakerintl.com]
Sent: Thursday, July 19, 2018 4:20 PM
To: Jones, Greg <Greg.Jones@dot.state.fl.us>
Cc: Parish, Nathan <Nathan.Parish@mbakerintl.com>; Wetherell, Alisha (Alisha.Wetherell@talgov.com) <Alisha.Wetherell@talgov.com>; Cowart, Ben <Ben.Cowart@talgov.com>
Subject: City of Tallahassee Solar Farm Phase II EA @ TLH - Obstruction Coordination

Good afternoon Mr. Jones – per our telephone conversation this afternoon, you are in receipt of the FDOT project notification and early coordination letter for the City of Tallahassee Solar Farm Phase II Environmental Assessment at Tallahassee International Airport. In response to your question regarding obstruction, Michael Baker International will be completing FAA Form 7460A which will include the solar farm and the 3 poles that are located outside the airport's property. This will include accompanying documentation that the proposed project and construction equipment that will be used to construct the proposed project will not obstruct ATCT line of sight, air operations, and Airport surfaces.

Please confirm our telephone conversation by responding to this email. Thank you.

*Florida Fish and Wildlife
Conservation Commission
Correspondence*

Andersen, Mariben

From: Hight, Jason <Jason.Hight@MyFWC.com>
Sent: Wednesday, January 23, 2019 2:23 PM
To: Gable, Jay; Andersen, Mariben
Cc: Hoehn, Ted
Subject: EXTERNAL: Tallahassee International Airport Solar Farm 2
Attachments: Tallahassee International Airport Solar Facility_32742_041317.pdf

Dear Mr. Gable,

Florida Fish and Wildlife Conservation Commission (FWC) staff have reviewed the project referenced above. We previously provided comments and recommendations in the initial request for review of a similar solar installation on this site. Our assessment of fish and wildlife resources and any potential impacts for individual projects within the Tallahassee International Airport boundary remain the same. We also acknowledge that there are several gopher tortoises (*Gopherus polyphemus*, State Threatened) onsite per your survey and that you have committed to survey again prior to construction and contact our gopher tortoise permitting staff to acquire any necessary permits.

If you need any further assistance, please do not hesitate to contact our office by email at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions, please contact Ted Hoehn by phone at (850) 488-8792 or by email at Ted.Hoehn@MyFWC.com.

Sincerely,

Jason Hight
Biological Administrator II
Office of Conservation Planning Services
Division of Habitat and Species Conservation
Florida Fish and Wildlife
Conservation Commission
620 S. Meridian Street, MS5B5
Tallahassee, Florida 32399-1600
(850) 228-2055



April 13, 2017

Florida Fish and Wildlife Conservation Commission

Commissioners
Brian Yablonski
Chairman
Tallahassee

Aliese P. "Liesa" Priddy
Vice Chairman
Immokalee

Ronald M. Bergeron
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Panama City

Charles W. Roberts III
Tallahassee

Robert A. Spottswood
Key West

Executive Staff
Nick Wiley
Executive Director

Eric Sutton
Assistant Executive Director

Jennifer Fitzwater
Chief of Staff

Office of the
Executive Director
Nick Wiley
Executive Director

(850) 487-3796
(850) 921-5786

Managing fish and wildlife resources for their long-term well-being and the benefit of people.

620 South Meridian Street
Tallahassee, Florida
32399-1600
Voice: (850) 488-4676

Hearing/speech-impaired:
(800) 955-8771 (T)
(800) 955-8770 (V)

MyFWC.com

Jared Searcy
Northwest District
Florida Department of Environmental Protection
470 Harrison Avenue
Panama City, FL 32401
Jared.Searcy@dep.state.fl.us

RE: City of Tallahassee, Tallahassee International Airport Solar Facility, Environmental Resource Permit Application #37-0352320-001-EI, Leon County

Dear Mr. Searcy:

Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed the above-referenced permit application. We provide the following comments and recommendations as technical assistance during your review of the ERP application under Chapter 373, Florida Statutes, and in accordance with FWC's authorities under Chapter 379, Florida Statutes.

Project Description

The applicant is proposing to construct a solar farm on a 120-acre parcel which is located between the south end of Runway 18-36 and the north side of Springhill Road, which will be connected to an overhead distribution line. The site on Tallahassee International Airport property has been cleared and maintained as a requirement for Runway 18-36 safety by the Federal Aviation Administration.

Comments and Recommendations

FWC staff provided technical assistance comments to the City of Tallahassee consultants in a letter dated May 5, 2016 (enclosed). Based upon on the applicant's commitments to ensure gopher tortoises (*Gopherus polyphemus*, State Threatened) do not enter the proposed solar field and complying with gopher tortoise conservation requirements, we have no further fish and wildlife concerns.

We appreciate the opportunity to provide information on this project. If you need any further assistance, please do not hesitate to contact Jane Chabre either by phone at (850) 410-5367 or at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Theodore Hoehn at (850) 488-8792 or by email at ted.hoehn@MyFWC.com.

Sincerely,

Scott Sanders, Director
Office of Conservation Planning Services

ss/th
ENV 1-2-2
Tallahassee International Airport Solar Facility_32742_041317

Jared Searcy
Page 2
April 13, 2017

Enclosure

cc: **Jean David. Fl Solar 1, LLC, jean.david@origisenergy.com**
Echo Gates, Genesis Group, egates@genesisgroup.com



May 5, 2016

Florida Fish and Wildlife Conservation Commission

Matthias Espinitu Andersen
Michael Baker International
5020 West Linebaugh Avenue, Suite 240
Tampa, FL 33624
mandersen@mbakerintl.com

Commissioners
Brian Yablonski
Chairman
Tallahassee

RE: Project Notification and Early Coordination Environmental Assessment for the Proposed Solar Utility Project at Tallahassee International Airport, City of Tallahassee, Leon County, Florida

Allise P. "Liese" Priddy
Vice Chairman
Immokalee

Ronald M. Bergeron
Fort Lauderdale

Richard Hanes
Oviedo

Bo Rivard
Panama City

Charles W. Roberts III
Tallahassee

Robert A. Spottswood
Key West

Dear Ms. Andersen:

Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed your request for information on listed species in association with an Environmental Assessment for the proposed solar energy project at Tallahassee International Airport (TLH). We offer the following comments and recommendations as technical assistance at your request.

Executive Staff

Nick Wiley
Executive Director

Eric Suttan
Assistant Executive Director

Jennifer Fitzwater
Chief of Staff

Project Description

The proposed project includes the construction of a solar utility project on a 120-acre parcel located between the south end of Runway 18-36 and the north side of Springhill Road. The solar utility project will be connected to an overhead distribution line which will follow an existing power line easement on the north side of Springhill Road, northeast to the intersection of Springhill Road and Capital Circle SW. From this point, the distribution line will proceed to the southeast along an existing easement on the north side of Capital Circle SW for a distance of approximately 0.5 mile. Then the distribution line will proceed north for approximately 0.6 miles on an existing easement to an existing electrical utility substation. New 40-foot utility poles for the distribution line will be installed within the existing utility easements and Right-of-Way described, but there will be no other construction or land clearing required for the construction of the distribution line. The site has been cleared and is maintained following Federal Aviation Administration safety requirements for Runway 18-36.

Office of the
Executive Director
Nick Wiley
Executive Director

(850) 487-3796
(850) 921-5786 FAX

Managing fish and wildlife
resources for their long-term
wellbeing and the benefit
of people.

To prevent wildlife intrusion, Michael Baker International has recommended that the City of Tallahassee install a wildlife chained link fence that is 10 feet in height with 3 rows of barb wire on top and a concrete footer to deter deer from jumping over and gopher tortoises from digging under the fence. This was recommended because of the proposed solar utility project's proximity to the Apalachicola National Forest and Tallahassee International Airport's gopher tortoise relocation area.

620 South Meridian Street
Tallahassee, Florida
32309-1600
Voice: (850) 488-4676

Hearing/Accessibility: (800) 955-8374 (T)
(800) 955-8374 (V)

MWFNCS001

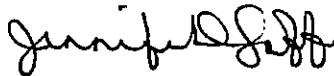
Comments and Recommendations

We do not anticipate any direct impacts to threatened species with the construction of the proposed solar utility project. We appreciate the recommendations of Michael Baker International to install conservation measures in an attempt to preclude gopher tortoises (*Gopherus polyphemus*, State Threatened) from moving into the proposed solar field. We also appreciate the additional information that has been provided regarding solar arrays and the potential for bird collisions and bird mortality (wading bird and migratory birds). We agree with the provided information that the proposed panels are unlikely to be mistaken for water by certain avian species.

We would like to work with the City of Tallahassee in developing a monitoring program to determine if there are any other potential effects that the solar utility project might have on avian species. We also recommend that standards that are provided by the Avian Power Line Interaction Committee (<http://www.aplic.org/>) be considered for the transmission lines associated with the solar utility project.

We appreciate the opportunity to provide information on this project. If you need any further assistance, please do not hesitate to contact Jane Chahre either by phone at (850) 410-5367 or at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Theodore Hoehn at (850) 488-8792 or by email at ted.hoehn@MyFWC.com.

Sincerely,



Jennifer D. Goff
Land Use Planning Program Administrator
Office of Conservation Planning Services

jdg/th
ENV 1
Tallahassee Airport Solar Farm_30758_050516

Andersen, Mariben

From: Hight, Jason <Jason.Hight@MyFWC.com>
Sent: Monday, October 22, 2018 4:37 PM
To: Andersen, Mariben; Hoehn, Ted
Subject: EXTERNAL: RE: COT Solar Farm 2 EA at Tallahassee Int'l Airport - Gopher Tortoise Survey Results.

If it isn't too difficult to set up a site visit that would be great...but it isn't a requirement!

Call me if you have any questions.

Jason Hight
Florida Fish and Wildlife
Conservation Commission
850-228-2055

From: Andersen, Mariben <MAnderсен@mbakerintl.com>
Sent: Monday, October 22, 2018 4:33 PM
To: Hoehn, Ted <ted.hoehn@MyFWC.com>; Hight, Jason <Jason.Hight@MyFWC.com>
Subject: FW: COT Solar Farm 2 EA at Tallahassee Int'l Airport - Gopher Tortoise Survey Results.

Jason – did you still want to look at the site?

Respectfully,

Mariben

From: Andersen, Mariben
Sent: Friday, July 13, 2018 5:00 PM
To: 'Hight, Jason' <Jason.Hight@MyFWC.com>
Cc: 'Hoehn, Ted' <ted.hoehn@MyFWC.com>
Subject: RE: COT Solar Farm 2 EA at Tallahassee Int'l Airport - Gopher Tortoise Survey Results.

Sorry about that. Here is the location map of the gopher tortoise burrows from the May survey. Appropriate permits from the City of Tallahassee and FWC will be applied for and acquired to relocate the gopher tortoises that would be impacted by the proposed project.

Respectfully,

Mariben

From: Andersen, Mariben
Sent: Friday, July 13, 2018 1:59 PM
To: 'Hight, Jason' <Jason.Hight@MyFWC.com>
Cc: Hoehn, Ted <ted.hoehn@MyFWC.com>
Subject: COT Solar Farm 2 EA at Tallahassee Int'l Airport - Gopher Tortoise Survey Results.

Hello Jason – thanks for responding. I am glad you remember working on Solar Farm 1. We worked on it with you and are very appreciative of your responsiveness.

Gopher Tortoise Survey Results

Attached is a copy of the gopher tortoise survey results. The City proposes to relocated the tortoises to the recipient site below:

Apalachicola National Forest Gopher Tortoise Research Site
U.S. Department of Agriculture Forest Service
325 John Know Road, Suite F-100, Tallahassee, FL 32303
FWC Permit No. GTR-10-00001A
Location is 30,3775, -84.336438883

Meeting

We will be in Tallahassee on August 28 and 29 if you would like to look at the site and meet. The other option is for me to schedule a web and telephone meeting if those dates do not work for you. If you want to meet in person, please let me know what time and date would work. We can meet at the airport and then show you the site.

Mailing Address

I have corrected the mailing address in my directory and the project agency tracking list.

Thanks and Happy Friday!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakerial.com



From: Hight, Jason [<mailto:Jason.Hight@MyFWC.com>]
Sent: Friday, July 13, 2018 1:07 PM
To: Andersen, Mariben <MAnderesen@mbakerintl.com>
Cc: Hoehn, Ted <ted.hoehn@MyFWC.com>
Subject: EXTERNAL: RE: COT Solar Farm 2 EA at Tallahassee Int'l Airport

Good afternoon,

We have received your letter requesting early coordination for this project. Our staff here in Tallahassee would be happy to meet at your convenience to discuss the project details. We previously reviewed another solar project at the airport and would be happy to provide additional technical assistance or participate in a site visit. Please feel free to contact me at any time. Also, for the record, please note the appropriate mailing address in my email signature.

Jason Hight
Biological Administrator

Office of Conservation Planning Services
Florida Fish and Wildlife
Conservation Commission
620 S. Meridian Street, MS5B5
Tallahassee, Florida 32399-1600
850-228-2055

From: Andersen, Mariben [<mailto:MAnderesen@mbakerintl.com>]
Sent: Friday, July 13, 2018 12:11 PM
To: Hight, Jason <Jason.Hight@MyFWC.com>
Cc: Hoehn, Ted <ted.hoehn@MyFWC.com>
Subject: City of Tallahassee Solar Farm 2 EA at Tallahassee Int'l Airport - Project Notification Letter

Good morning –

Michael Baker International Inc. is sending the attached Solar Farm 2 Environmental Assessment (EA) Project Notification Letter on behalf of the City of Tallahassee Electric and Tallahassee International Airport to inform you about the proposed project and initiate coordination. If you have any information or concerns about the proposed project, please feel free to contact me. Thank you!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakintl.com



*Florida State Clearinghouse
Correspondence*

From: [Stahl, Chris](#)
To: [Andersen, Mariben](#)
Cc: [State Clearinghouse](#); [Gable, Jay](#)
Subject: EXTERNAL: State_Clearance_Letter_For_FL201903258560C_Tallahassee International Airport Solar Project 2 at Tallahassee International Airport, Leon County
Date: Monday, May 6, 2019 3:09:49 PM

May 6, 2019

Mariben Andersen
Michael Baker International, Inc.
4211 West Boy Scout, Suite 240
Tampa, Florida 33607

RE: Federal Aviation Administration - Draft Environmental Assessment, Construction and Operation of FL Solar 4, LLC and Tallahassee International Airport Solar Project 2 at Tallahassee International Airport, Leon County, Florida
SAI # FL201903258560C

Dear Mariben:

Florida State Clearinghouse staff has reviewed the proposal under the following authorities: Presidential Executive Order 12372; § 403.061(42), Florida Statutes; the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended; and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4347, as amended.

Based on the submitted documentation it appears that the project may require authorization under Rule 62-330, FAC for stormwater treatment. According to the Operating Agreement between the Department and the NWF WMD, the applicant would apply for authorization through the Department of Environmental Protection.

A review of the Florida Master Site File indicates that the project area has previously been surveyed, Phase I Cultural Resource Investigations of the Tallahassee International Airport Solar Farm Project, Leon County, Florida (MS# 22792); Cultural Resource Assessment Survey of the City of Tallahassee Solar Farm 2 at Tallahassee International Airport, Leon County (MS# 25874); and Addendum Cultural Resource Assessment Survey Technical Memorandum FL Solar 4, LLC/ Tallahassee International Airport Solar Project 2, Leon County, Florida (MS# 25875), during which no cultural resources listed, or eligible for listing, in the National Register of Historic Places were identified within the referenced project area. It is the opinion of this office that the proposed project is unlikely to affect historic properties. However, unexpected finds may occur during ground disturbing activities, and we request that the permit, if issued, should include the following special condition regarding inadvertent discoveries: If prehistoric or historic artifacts, such as pottery or ceramics, projectile points, dugout canoes, metal implements, historic building materials, or any other physical remains that could be associated with Native American, early European, or American settlement are

encountered at any time within the project site area, the permitted project shall cease all activities involving subsurface disturbance in the vicinity of the discovery. The applicant shall contact the Florida Department of State, Division of Historical Resources, Compliance Review Section at (850)-245-6333. Project activities shall not resume without verbal and/or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Section 872.05, Florida Statutes. If you have any questions, please contact Alyssa Costas, Historic Sites Specialist, by email at Alyssa.Costas@dos.myflorida.com, or by telephone at 850.245.6333 or 800.847.7278.

Based on the information submitted and minimal project impacts, the state has no objections to allocation of federal funds for the subject project and, therefore, the funding award is consistent with the Florida Coastal Management Program (FCMP). The state's final concurrence of the project's consistency with the FCMP will be determined during any environmental permitting processes, in accordance with Section 373.428, Florida Statutes, if applicable.

Sincerely,

Chris Stahl

Chris Stahl, Coordinator
Florida State Clearinghouse
Florida Department of Environmental Protection
3800 Commonwealth Blvd., M.S. 47
Tallahassee, FL 32399-2400
ph. (850) 717-9076
State.Clearinghouse@floridadep.gov



Andersen, Mariben

From: State_Clearinghouse <State.Clearinghouse@dep.state.fl.us>
Sent: Monday, July 23, 2018 3:57 PM
To: Andersen, Mariben; State_Clearinghouse
Subject: EXTERNAL: RE: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Great, When this project gets to the Draft EA stage send it to me if you think you need another consistency determination should be done.

Chris Stahl

Chris Stahl, Coordinator
Florida State Clearinghouse
Florida Department of Environmental Protection
2600 Blair Stone Road, M.S. 47
Tallahassee, FL 32399-2400
ph. (850) 717-9076
State.Clearinghouse@dep.state.fl.us

From: Andersen, Mariben [mailto:MAnderсен@mbakerintl.com]
Sent: Friday, July 13, 2018 11:48 AM
To: State_Clearinghouse <State.Clearinghouse@dep.state.fl.us>
Subject: City of Tallahassee Solar Farm 2 at Tallahassee Int'l Airport - Project Notification Letter

Good morning Chris -

Michael Baker International Inc. is sending the attached Solar Farm 2 Environmental Assessment (EA) Project Notification Letter on behalf of the City of Tallahassee Electric and Tallahassee International Airport to inform you about the proposed project and initiate coordination. If you have any information or concerns about the proposed project, please feel free to contact me. Thank you!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakintl.com



Northwest Florida Water Management District Correspondence

Andersen, Mariben

From: Janet Strutzel <Janet.Strutzel@nfwwater.com>
Sent: Monday, July 16, 2018 10:00 AM
To: Andersen, Mariben
Cc: Andrew Joslyn; Ken Greenwood; Dana Palermo
Subject: EXTERNAL: City of Tallahassee Solar Farm 2EA at Tallahassee International Airport - Project Notification Letter

Good Morning Mariben,

The District is receipt of your project notification letter regarding the City of Tallahassee's proposed 40 MWac Solar Farm at Tallahassee International Airport. Per our operating agreement with DEP, permitting responsibilities are divided based on the type of activities being permitted. DEP will be the agency conducting all of the necessary ERP reviews for this project. Tanya McHale is the Section Supervisor for the ERP program and can be contacted by phone at 850-595-0614 or via e-mail Tanya.McHale@dep.state.fl.us. Thank You.

Janet Strutzel

Program Manager/Environmental Scientist
Northwest Florida Water Management District
152 Water Management Drive
Havana, Florida 32333
Direct Line: 850-539-2641
Office Line: 850-539-5999
Fax: 850-539-2693
e-mail: Janet.Strutzel@nfwfwd.state.fl.us
<https://www.nfwwater.com/>

From: Andersen, Mariben [<mailto:MAnderesen@mbakerintl.com>]
Sent: Friday, July 13, 2018 12:12 PM
To: Ken Greenwood <Ken.Greenwood@nfwwater.com>
Cc: Ron Potts <Ron.Potts@nfwwater.com>
Subject: City of Tallahassee Solar Farm 2 EA at Tallahassee Int'l Airport - Project Notification Letter

Good morning Ken -

Michael Baker International Inc. is sending the attached Solar Farm 2 Environmental Assessment (EA) Project Notification Letter on behalf of the City of Tallahassee Electric and Tallahassee International Airport to inform you about the proposed project and initiate coordination. If you have any information or concerns about the proposed project, please feel free to contact me. Thank you!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakintl.com



ATTACHMENT D4

Local Agency Correspondence

*City of Tallahassee
Growth Management Department
Correspondence*

Andersen, Mariben

From: Cassidy, Rodney <Rodney.Cassidy@talgov.com>
Sent: Friday, June 29, 2018 9:42 AM
To: Andersen, Mariben
Subject: EXTERNAL: RE: COT Solar Farm 2 - TGMD Coord Notes

Mary Ann Teasley.....891-7167.....cell..933-0172

Thanks for the due diligence, I think everything is on the right track for NFI/EIA approval.

Rodney

From: Andersen, Mariben [mailto:MAnderesen@mbakerintl.com]
Sent: Thursday, June 28, 2018 4:41 PM
To: Cassidy, Rodney
Cc: Wetherell, Alisha; Cowart, Ben; Barkve, Craig; Serles, Randall
Subject: COT Solar Farm 2 - TGMD Coord Notes

Hello Rodney – thank you very much for calling me back. Below is a quick summary of our telephone conversation –

1. BENT GOLDEN ASTER
 - a. We will survey the bent golden aster in September and provide you with the exact area.
2. TREES
 - a. This will have to be coordinated with Ms. Tafley.
 - b. Variables include the location of the trees (within Airport Safety Project Area or natural areas)
3. GOPHER TORTOISE
 - a. Forward the draft map and proposed recipient area for approval
4. NFI REPORT
 - a. Draft currently being developed
5. ENV. IMPACT ANALYSIS
 - a. Early coordination is key
 - b. Agency review can be completed in 30-60 days provided mitigation is acceptable to TGMD.

Please feel free to add or revise if I missed anything. Have a great Fourth!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakerial.com



Andersen, Mariben

From: Cassidy, Rodney <Rodney.Cassidy@talgov.com>
Sent: Friday, July 06, 2018 8:35 AM
To: Andersen, Mariben
Cc: Barkve, Craig
Subject: EXTERNAL: RE: COT Solar Farm 2 - NFI

As per our telephone conversation, the bent golden aster is easily identifiable in September and can be identified by mid-August. A correct NFI can be approved very quickly, so we prefer the complete NFI.

Rodney

From: Andersen, Mariben [mailto:MAnderesen@mbakerintl.com]
Sent: Monday, July 02, 2018 8:33 AM
To: Cassidy, Rodney
Cc: Barkve, Craig
Subject: COT Solar Farm 2 - NFI

Rodney – would it be acceptable to the City TGMD to submit the NFI with potential bent golden aster habitat areas and we can provide the detailed Bent Golden Aster populated areas when we submit the EIA? Please advise. Thank you!

Respectfully,

Mariben

From: Cassidy, Rodney [mailto:Rodney.Cassidy@talgov.com]
Sent: Monday, July 02, 2018 8:21 AM
To: Andersen, Mariben <MAnderesen@mbakerintl.com>
Subject: EXTERNAL: RE: COT Solar Farm 2 - Proposed Gopher Tortoise Recipient Site

This is part of the network of good sites where the habitat restoration is proceeding faster than the gp population is expanding, this is acceptable to the COT.

Rodney

From: Andersen, Mariben [mailto:MAnderesen@mbakerintl.com]
Sent: Friday, June 29, 2018 10:33 AM
To: Cassidy, Rodney; Barkve, Craig
Cc: Cowart, Ben; Wetherell, Alisha; Jason Thomas; Gable, Jay
Subject: COT Solar Farm 2 - Proposed Gopher Tortoise Recipient Site

Good morning Rodney and Craig – per my telephone conversation with Rodney yesterday, the City of Tallahassee (COT) Solar Farm 2 at Tallahassee International Airport (TLH), hereinafter referred to as “Project” has unavoidable impacts to the gopher tortoise and their habitat. Relocation of the gopher tortoises within this area of the airport also helps with keeping wildlife out of and away from the TLH’s aircraft operations area. We propose relocating the gopher tortoises that would be impacted to the recipient site below:

Apalachicola National Forest Gopher Tortoise Research Site
U.S. Department of Agriculture Forest Service
325 John Know Road, Suite F-100, Tallahassee, FL 32303
FWC Permit No. GTR-10-00001A
Location is 30,3775, -84.336438883

The site is located south of the Airport and Springhill Road. East of Lonnie Gray Road and FR 6303. P

Please let me know if this site is acceptable. Thank you!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakerial.com



Andersen, Mariben

From: Andersen, Mariben
Sent: Monday, October 01, 2018 2:09 PM
To: Mary Ann Teasley (maryann.teasley@talgov.com)
Cc: Cowart, Ben; Wetherell, Alisha (Alisha.Wetherell@talgov.com); Serles, Randall; Jason Thomas
Subject: COT Solar Farm 2 @ TLH - Tree Survey and Mitigation

Good afternoon Mary – thank you for speaking with me this afternoon. Below is a summary of our telephone conversation –

1. We are preparing the NFI for submittal.
2. Tree Survey hard copy minimum print size is letter size. Michael Baker will print the size that would allow the best legibility.
3. No tree mitigation will be required for the project.

Please let me know if I missed anything. Thank you for your help!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakerial.com



Andersen, Mariben

From: Andersen, Mariben
Sent: Thursday, October 25, 2018 11:18 AM
To: 'Cassidy, Rodney'
Subject: COT Solar Farm 2 @ TLH - Bent Golden Aster Mitigation
Attachments: IMG_0065.jpg; ApalachicolaForestBGA.jpg

Good morning Rodney – Thank you for returning my phone call. Per our telephone conversation this morning, the City of Tallahassee’s proposed Solar Farm 2 Project at Tallahassee International Airport has unavoidable impacts to the bent golden aster because of the sites existing terrain. It is hilly and uneven so it has to be cleared and graded for the contractor to install the solar panel arrays and associated structures. However, once the grading has been completed and the solar panels have been installed, the solar panels will not fully shade the ground will be planted with grass which will allow for other groundcover plant species growth (see attached photo of Solar Farm 1 with tall grass that was taken on 8/28/18). There is a healthy population of bent golden aster across the project site on the Apalachicola National Forest side of the road (see attached photo). We submit that because of the present of bent golden aster seed source immediately next to the site, bent golden aster will most likely volunteer at the Solar Farm 2 site. The lack of cover will also allow bent golden aster to grow in areas where it could not before due to shading from shrubby vegetation. For this reason, we are not applying for a variance and propose to plant 15-20% beneficial plant species such as gopher apple which is one of the preferred food source of the gopher tortoise at the gopher tortoise preserve.

Please let me know if this proposed mitigation is acceptable. Thank you for all of your help and Happy Halloween!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakintl.com





November 7, 2018,

Ms. Judy Hayden
EGS
104 North Magnolia Drive
Tallahassee, Florida 32301

RE: NFI
TNF: 180030
Solar Farm 2
ID: 41072080100

Dear Ms. Hayden:

We have reviewed and approved the Natural Features Inventory (NFI) submitted on October 18, 2018. The following natural features have been identified on site or adjacent to the site.

1. 100 Year Floodplain
2. Unaltered Wetlands
3. Significant Grades
4. Unaltered Waterbodies
5. Severe Grades
6. Listed Species (Gopher Tortoise and Bent Golden Aster)
7. Special Development Zone (A&B)
8. Karst Feature
9. Closed Basins

Should you have any questions or require additional information, please contact our office at (850) 891-7100.

Sincerely,

Rodney O. Cassidy
Senior Environmental Biologist
Growth Management Department

CC: Mariben Andersen

Andersen, Mariben

From: Cassidy, Rodney <Rodney.Cassidy@talgov.com>
Sent: Monday, December 10, 2018 11:43 AM
To: Andersen, Mariben
Subject: EXTERNAL: RE: FL Solar 4 LLC/TLH Sola Project 2- Proposed Mitigation For Unavoidable Environmental Impacts w/ attachments - Update Please

I think you can write the EIA up as per our discussions and submit it.

From: Andersen, Mariben <MAndersen@mbakerintl.com>
Sent: Monday, December 10, 2018 11:02 AM
To: Cassidy, Rodney <Rodney.Cassidy@talgov.com>
Cc: Wetherell, Alisha <Alisha.Wetherell@talgov.com>; Jason Thomas <Jason.Thomas@origisenergy.com>; Cowart, Ben <Ben.Cowart@talgov.com>; Gable, Jay <JGable@mbakerintl.com>; Barkve, Craig <Craig.Barkve@talgov.com>
Subject: FW: FL Solar 4 LLC/TLH Sola Project 2- Proposed Mitigation For Unavoidable Environmental Impacts w/ attachments - Update Please

*****EXTERNAL EMAIL*****

Please report any suspicious attachments, links, or requests for sensitive information.

Good morning Rodney,

I just wanted to follow up on the proposed mitigation for the unavoidable environmental impacts associated with the proposed solar farm project and find out if the City agrees with the proposed mitigation so we can draft and submit the EIA. Thank you and Happy Holidays!

Respectfully,

Mariben

From: Andersen, Mariben
Sent: Tuesday, November 27, 2018 2:49 PM
To: Cassidy, Rodney <Rodney.Cassidy@talgov.com>
Subject: COT Solar Farm 2 @ TLH - Proposed Mitigation For Unavoidable Environmental Impacts

Hello Rodney –

Per our telephone conversation this morning, the proposed Solar Farm 2 project site has to be graded due to its hilly and uneven terrain and therefore has unavoidable natural resource impacts. The proposed mitigation for the construction of Solar Farm 2 (Solar Farm, BP 34 and Access Road) are detailed below:

Tree Impact and No Mitigation

Per my telephone conversation with Ms. Mary Ann Teasley on October 1, 2018 and as required by the Tallahassee International Airport (TLH) Wildlife Hazard Management Plan (WHMP) in compliance with Federal Aviation Administration safety requirements and wildlife hazard management at airports, no tree mitigation is proposed because Section 2 of TLH's WHMP details the removal of all trees and vegetation within the Air Operations Area (AOA) of the airport as they provide wildlife habitat and may serve as a wildlife

attractant. Furthermore, the WHMP recommends that forested areas located outside the AOA but are within Airport property be cleared to create a buffer zone around the existing perimeter fence (please see attached TLH WHMP excerpt). The proposed Solar Farm 2 project area is located west of the Runway 13-36 and is within the TLH's AOA because the trees were eventually going to be removed as part of the TLH's Safety Program.

Gopher Tortoise Impact and Mitigation

A 100 percent gopher tortoise survey will be conducted by a State Authorized Gopher Tortoise Agent within 90 days prior to construction to locate and flag all gopher tortoise burrows within the Solar Farm 2 project area using a handheld Global Positioning System (GPS) unit. The location of the gopher tortoise burrows will be depicted on a map and submitted with the Florida Fish and Wildlife Conservation Commission (FWC) Gopher Tortoise Conservation Permit application. After receipt of the FWC Gopher Tortoise Conservation Permit, each burrow will be carefully and slowly excavated with a backhoe under the supervision of a State Authorized Gopher Tortoise Agent to capture gopher tortoises. The gopher tortoises will be relocated to the recipient site below which is located south of TLH and Springhill Road.

Apalachicola National Forest Gopher Tortoise Research Site
 U.S. Department of Agriculture Forest Service
 325 John Know Road, Suite F-100, Tallahassee, FL 32303
 FWC Permit No. GTR-10-00001A
 Location is 30,3775, -84.336438883

Bent Golden Aster Impact and Mitigation

The project proposes to install a fence that is approximately 10-12 feet inside the western project area and airport property limits adjacent to the Apalachicola National Forest. This will approximately result in a 3.95 acre open and level buffer area (14,350 ft. x 10 ft. = 172,200 sq. ft./43,560 = 3.95 acres) that after construction is completed will be outside the Solar Farm 2 area, where disturbance from vehicular activity will be limited to periodic security checks from TLH operations staff. This buffer area will be the recipient site for 15% or 125 stems (831 stems x 15% = 125 stems) of the bent golden aster that will be relocated. It will also serve as an area where bent golden aster can volunteer and thrive and is immediately adjacent to a healthy population of bent golden aster and seed source that is located on the Apalachicola National Forest and was observed during the 8/28/18 bent golden aster survey (refer to attached photo). Because it is a level open area that will receive sufficient sunlight and have limited vehicular traffic, this buffer area is suitable habitat for bent golden aster and is anticipated to eventually have a healthy population of bent golden aster that may potentially exceed the number of stems that was originally at the site prior to construction. The open grassy condition of the area where the solar arrays are located that is occasionally mowed may also allow volunteer growth of bent golden aster.

Additionally, approximately 20% or 166 *Licania michauxii* or gopher apple in 1-gallon containers (831 bent golden aster stems x 20% = 166 units) would be planted at TLH's Gopher Tortoise Preservation Area to provide additional forage for the gopher tortoise and other wildlife. The native gopher apple fruit is a favorite of the gopher tortoise and other mammals. The plantings would increase the number of gopher apples at TLH's Gopher Tortoise Preservation Area and provide food to the gopher tortoise and other animals.

TABLE 1	
SOLAR FARM 2 BENT GOLDEN ASTER SURVEY RESULTS	
Bent Golden Aster ID	Approximate No. of Stems
BGA 1	6
BGA 2	300

BGA 3	60
BGA 4	30
BGA 5	60
BGA 6	20
A-BGA 7	200
A-BGA 8	3
A-BGA 9	16
A-BGA 10	23
A-BGA 11	22
BGA 12	5
A-BGA 13	63
A-BGA 14	5
A-BGA 15	18
TOTAL	831
LEGEND: BGA – located in Solar Farm 2 Solar Array Area A-BGA – located in Solar Farm 2 Access Road Corridor	

Please forward any comments to me or contact me if you have any questions. Happy Holidays!

Respectfully,

Mariben

From: Cassidy, Rodney <Rodney.Cassidy@talgov.com>
Sent: Tuesday, November 27, 2018 8:40 AM
To: Andersen, Mariben <MAnderсен@mbakerintl.com>
Subject: EXTERNAL: RE: COT Solar Farm 2 @ TLH - NFI Add'l Info - Adding Access Roads to Project Area

Hi Mariben,

We will need to transplant 10 to 20 percent of the bent golden aster on-site and provide some restoration to the gopher tortoise area. After talking to my admin they had some issues with the listed species so we need to take a couple of more steps and make sure to write it up in a manner that explains the net benefit to the two listed species involved. If you have questions please call.

Rodney

From: Andersen, Mariben <MAnderсен@mbakerintl.com>
Sent: Friday, November 02, 2018 1:39 PM
To: Cassidy, Rodney <Rodney.Cassidy@talgov.com>
Cc: Gable, Jay <JGable@mbakerintl.com>
Subject: COT Solar Farm 2 @ TLH - NFI Add'l Info - Adding Access Roads to Project Area

Good afternoon Rodney – I wanted to let you know just in case you have completed the review of the NFI application that we will be sending an addendum to you next week that will contain additional information for the NFI application for this project.

A decision was made on Monday, October 29th to add access roads to the project area after it was determined that the roads would have to be hardened and widened to accommodate construction equipment (see attached site plan with access roads). A gopher tortoise and bent golden aster survey was conducted on October 30th and 31st and the preliminary results are depicted in the attached “access road” portable document file.

Please contact me if you have any question. I will call you next week to follow up and confirm what files we need to send you. Thank you for all of your help. Have a great weekend!

Mariben Espiritu Andersen | Sr. Associate/Env. Manager | Michael Baker International
4211 West Boy Scout Blvd., Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakerial.com





ATTACHMENT E

Tribal Correspondence

City of Tallahassee

FL Solar 4, LLC/Tallahassee International Airport Solar Project 2
Native American Consultation Contact List

Tribe	Contact Name	Location or Position	Mailing Address	Email	Sent on	Replied/Comments
Miccosukee Tribe of Indians of Florida	Billy Cypress	Chairman	Tamiami Station, P.O. Box 440021, Miami, FL 33144			
	Fred Dayhoff	Section 106 and NAGPRA Representative	HC 61 SR Box 68 Old loop Road Ochopee, FL 34141		3/11/2019	USPS or US Mail only. Do not used FedEx
Muscogee (Creek) Nation	James Floyd	Principal Chief Office of Administration	P.O. Box 580, Okmulgee, OK 74447			
Muscogee (Creek) Nation Cultural Preservation	Corrain Loe-Zepeda	Historic and Cultural Preservation Department	P.O. Box 580, Okmulgee, OK 74447	Section106@mcn-nsn.gov	3/11/2019	
Poarch Band of Creek Indians	Stephanie A. Bryan	Tribal Chair	5811 Jack Springs Road Atmore, AL 36502			
	Carolyn M White	Acting Tribal Historic Preservation Officer		cwhite@pci-nsn.gov	3/11/2019	
Seminole Tribe of Florida	Marcellus W. Osceola	Chairman	6300 Stirling Road, Hollywood, FL 33024			
	Paul N. Backhouse, Ph.D.	Acting Tribal Historic Preservation Officer	30290 Josie Billie Highway PMB 1004, Clewiston, FL 33440			
	Bradley Mueller	Compliance Review Supervisor	30290 Josie Billie Highway PMB 1004, Clewiston, FL 33440	THPOCompliance@semtribe.com	3/11/2019	
	Victoria Menchaca, MA	Compliance Review Specialist STOF-THPO Compliance Review Section	30290 Josie Billie Highway PMB 1004, Clewiston, FL 33440	VictoriaMenchaca@semtribe.com	3/11/2019	
Seminole Nation of Oklahoma	Gregory Chilcoat	Principal Chief	P.O. Box 1498, Wewoka, OK 74884			
	Theodore Isham	Tribal Historic Preservation Officer		isham.t@sno-nsn.gov	3/11/19	



U.S. Department
of Transportation
**Federal Aviation
Administration**

Orlando Airports District Office
8427 South Park Circle, Suite 524
Orlando, FL 32819
Phone: (407) 487-7220
Fax: (407) 487-7135

March 8, 2019

Mr. Fred Dayhoff
Section 106 and NAGPRA Coordinator
Miccosukee Tribe of Indians of Florida
HC 61
SR Box 68 Old Loop Road
Ochopee, Florida 34141

RE: Section 106 Consultation
Proposed Solar Farm (Phase 2) at the Tallahassee International Airport
Tallahassee, Florida (Leon County)

Dear Mr. Dayhoff,

The City of Tallahassee has requested environmental approval from the Federal Aviation Administration (FAA) for the installation of solar power energy generating equipment at the Tallahassee International Airport. The federal actions associated with the proposed runway extension project is an "undertaking" subject to the *National Historic Preservation Act* (Section 106) and its implementing regulations at 36 CFR Part 800. The federal actions are also subject to the *National Environmental Policy Act* (NEPA). An Environmental Assessment is being prepared to meet FAA's obligations under NEPA. The agency intends to complete Section 106 in conjunction with the NEPA process. This letter invites the Miccosukee Tribe of Indians of Florida to participate in Section 106 consultation with the FAA.

Proposed Undertaking

The City, which owns and operates of the airport, proposes to lease 317 acres of airport property to the City of Tallahassee Electric Utility. In turn, the Electric Utility will contract with a private company to install, maintain, and operate the solar energy facility. This renewable energy project (nominal 40-megawatts AC) will decrease the City's use of electricity generated by fossil fuel. The proposed project, also referred to as "Solar Farm 2", includes the following:

- Clear and grade the project site.
- Install solar photovoltaic energy generation panels and related equipment on 305 acres of the 317-acre lease area, three utility poles, and a power substation.
- Install perimeter fencing and access gates.
- Widen and strengthen approximately 8,256 linear feet of existing unpaved airport airfield roads to provide access to the site. The roads would be widened from 14 to 20 feet wide and remain unpaved.
- Construct drainage improvements, including swales and a detention pond.

The location of the airport is shown on Figure 1. The location of the proposed project are depicted on Figure 2.

Area of Potential Effect

The Area of Potential Effects (APE) was designated to include areas in which the undertaking may directly, or indirectly, cause alterations in the character or use of historic properties. The construction and operation of the proposed project would not alter aviation activity at the airport or the number of passengers using the airport. Therefore, the potential for any indirect or cumulative effects would be negligible outside the area of disturbance (immediate footprint of construction activities). Therefore, the APE was limited to the footprint of proposed activities on land within the existing boundaries of the project.

Historic and Archaeological Resources in the APE

Potential for historic and archaeological resources within the Solar Farm 2 APE was investigated in two separate Phase I Cultural Resources Site Assessments (CRAS). Each CRAS was prepared to identify cultural resources within the APE and assess their eligibility for listing in the National Register of Historic Places (National Register) according to the criteria set forth in 36 CFR Section 60.4. All work was carried out in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and its implementing regulations in 36 CFR Part 800: Protection of Historic Properties, and in conformity with the standards in the Florida Division of Historic Resources' *Cultural Resource Management Standards and Operational Manual*. The resulting surveys and reports meet specifications in Chapter 1A-46, Florida Administrative Code (FAC), and complies with Chapters 267 and 373.

Electronic copies of the 2016 CRAS, the 2018 CRAS, and the addendum to the 2018 CRAS are enclosed for your review. The findings and recommendations in each CRAS are summarized below.

2016 Cultural Resource Assessment Survey

A CRAS was prepared in March 2016 for the initial installation of solar power energy generating equipment at the airport (Solar Farm 1). The *Phase I Cultural Resource Investigations of the Tallahassee International Airport Solar Farm Project* also evaluated two parcels (Parcel F and Parcel G) that now comprise a large portion of the Solar Farm 2 project's APE.

The Florida Master Site File (FMSF) search conducted for the 2016 CRAS found no previously documented archaeological or historic resources within the APE, including the Parcel F and Parcel G portions of the APE. A field survey was conducted in February and March of 2016. No structures were found in Parcel F or Parcel G. One new archaeological site, assigned FMSF number 8LE06219, was found on Parcel F. In the investigator's opinion, this site was not eligible for listing on the National Register. No archaeological sites were found on Parcel G. The CRAS recommended that the installation of solar power energy generating equipment would have no effect on historic, archaeological, cultural resources listed or eligible for listing in the National Register. No additional investigation was recommended.

2018 CRAS Investigation of Parcels I, Parcel FI, and Airfield Access Roads

A second CRAS, entitled *Cultural Resource Assessment Survey of the City of Tallahassee Solar Farm 2 at Tallahassee International Airport*, evaluated the portions of the Solar Farm 2 APE that was not included in the 2016 CRAS. The areas evaluated in this CRAS were Parcel

J and Parcel F1. The FMSF search located two previously documented archaeological sites: 8LE00030 (mapped within Parcel J) and 8LE06219 (mapped partly within Parcel F1). These sites were previously determined to be ineligible for listing on the National Register. The field survey, conducted in May 2018, found no structures and no archeological resources on Parcel J or Parcel F1. The 2018 CRAS recommended that the proposed undertaking (within the Parcel F1 and Parcel J portions of the APE), would have no effect on historic, archaeological, cultural resources listed in or eligible for listing on the National Register. No additional investigation was recommended.

In December 2018, an additional CRAS was performed as an addendum to the 2018 CRAS. The supplemental survey evaluated the proposed improvements to existing unpaved airfield access roads, which were identified as elements of the undertaking. The additional work evaluated the two areas in which airfield access road improvements would occur and a small triangular area in which a new electrical substation would be installed (see Figure 3). The two access road segments provide access to the northern end and southern end of the project site. The survey recommended that the additional elements of the undertaking (access road improvements and new substation) would have no effect on historic, archaeological, cultural resources listed in or eligible for listing on the National Register. No additional investigation was recommended.

Section 106 Consultation

Pursuant to 36 CFR § 800.2(c)(2)(B)(ii), the FAA is seeking input on properties of cultural or religious significance that may be affected by the undertaking, and invites the Miccosukee Tribe of Indians of Florida to participate in government-to-government consultation in the Section 106 consultation process.

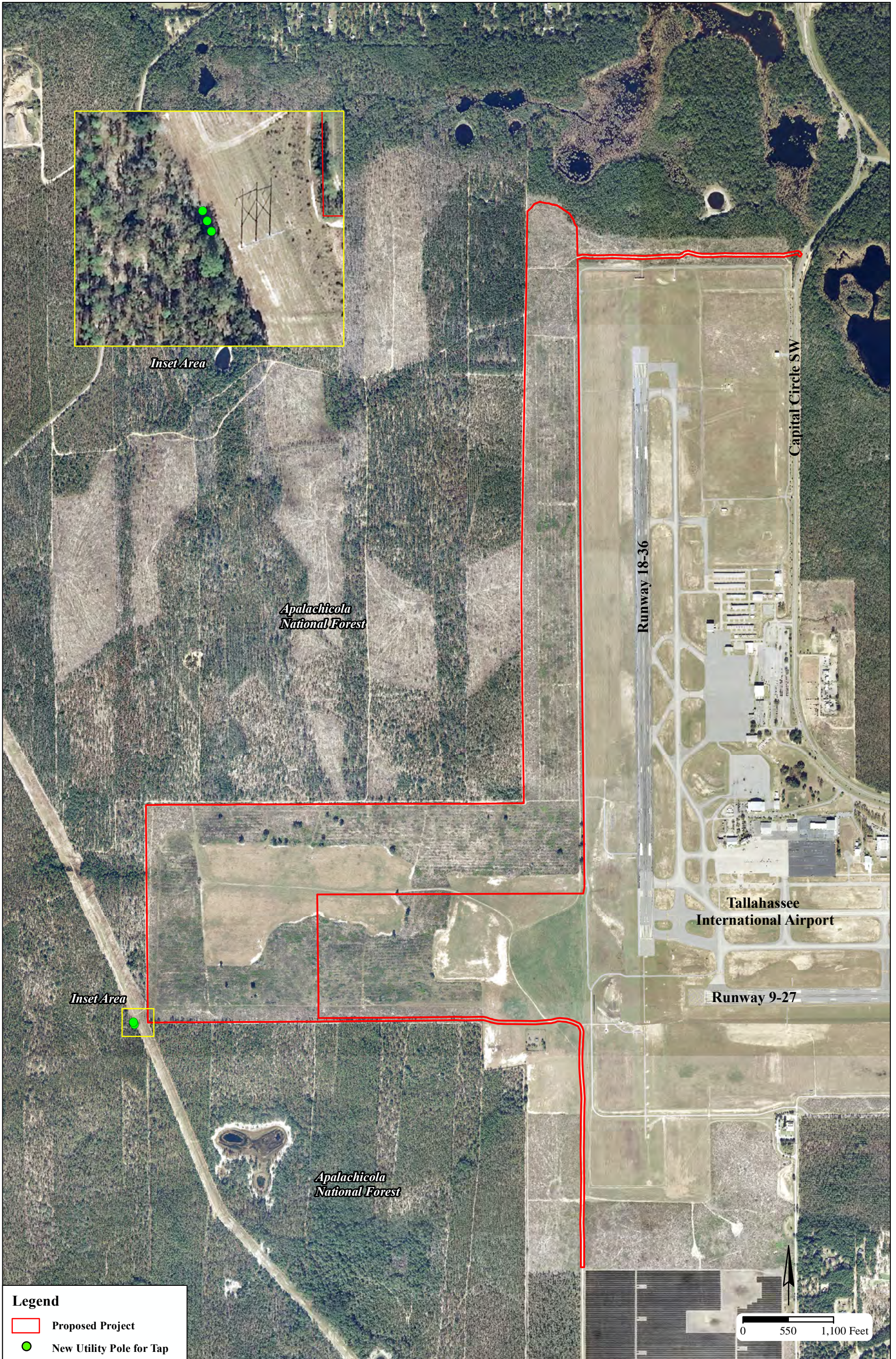
The FAA appreciates your review of the Cultural Resource Assessment Survey reports. Please contact me at (407) 487-7296 or peter.m.green@faa.gov within 30 days of the receipt of this letter if you have any questions, if you concur with the recommendations in the reports, or if you have comments or need additional information.

Sincerely,



Peter M. Green, AICP
Environmental Protection Specialist
FAA Orlando Airports District Office

Enclosures



Legend

- Proposed Project
- New Utility Pole for Tap

PROJECT AREA
FL Solar 4, LLC / Tallahassee International Airport Solar Project 2
Environmental Assessment

Figure 2



Muscogee (Creek) Nation Correspondence

Andersen, Mariben

From: Section106 <Section106@mcn-nsn.gov>
Sent: Tuesday, March 19, 2019 10:17 AM
To: Andersen, Mariben
Subject: EXTERNAL: RE: Proposed Solar Farm Phase 2 at Tallahassee Int'l Airport Section 106 Consultation from the FAA

Peter M. Green, AICP
Environmental Protection Specialist
FAA Orlando Airports District Office

Mr. Green;

Thank you for contacting the Muscogee (Creek) Nation concerning the proposed Solar Farm Installation Project (Phase 2) at the Tallahassee International Airport in Leon County, Florida. This project area is located within our historic area of interest and is of importance to us. After reviewing the material provided, and noting that the project area was sufficiently tested during the archaeological survey, it has been determined that the Muscogee (Creek) Nation has no objections to the proposed project. Please consider this letter as our concurrence to your request and findings of **no historic or traditional cultural properties affected**. However, should cultural material or human remains be encountered during ground disturbance, construction or demolition, we request to be notified. Also, if there are any additional updates, we ask to be informed of these. Should further information or comment be needed, please do not hesitate to contact me at (918) 732-7852 or by email at djproctor@mcn-nsn.gov

David J. Proctor

Historic and Cultural Preservation Department, Traditional Cultural Advisor
Muscogee (Creek) Nation
P.O. Box 580 / Okmulgee, OK 74447
T 918.732.7852
F 918.758.0649
djproctor@mcn-nsn.gov
<http://www.muscogeenation-nsn.gov/>

From: Andersen, Mariben [mailto:MAnderсен@mbakerintl.com]
Sent: Monday, March 11, 2019 12:15 PM
To: Section106
Subject: Proposed Solar Farm Phase 2 at Tallahassee Int'l Airport Section 106 Consultation from the FAA

Dear Ms. Corrain Loe-Zepeda,

I am sending the attached Section 106 Consultation Letter and attachments on behalf of Mr. Peter Green of the Federal Aviation Administration (FAA) Orlando Airport District Office for the referenced project. The link below will allow you to download the project location map, project area map, 2016 Cultural Resource Assessment Survey and 2018 CRAS Investigation of Parcels K and F1 and the Airfield Access Roads.

Please contact Mr. Green if you have any questions or comments. Receipt of your comments on or before April 10, 2019 would be greatly appreciated.

Mariben Andersen | Department Manager - Environmental
4211 W Boy Scout Blvd. Suite 500 | Tampa, FL 33607 | [O] 813-466-6026 | [M] 727-560-6757
mandersen@mbakerintl.com | www.mbakerial.com | [f](#) [t](#) [@](#) [in](#) [v](#)



From: Andersen, Mariben <eFTP@mbakerintl.com>
Sent: Monday, March 11, 2019 12:56 PM
To: Andersen, Mariben <MAnderesen@mbakerintl.com>
Subject: Proposed Solar Farm Phase 2 at Tallahassee Int'l Airport Section 106 Consultation



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Seminole Tribe of Florida Correspondence

From: Victoria Menchaca <VictoriaMenchaca@semtribe.com>
Sent: Friday, April 05, 2019 3:40 PM
To: Green, Peter M (FAA) <peter.m.green@faa.gov>
Cc: Andersen, Mariben <MAnderesen@mbakerintl.com>
Subject: RE: Proposed Solar Farm Phase 2 at Tallahassee Int'l
 Airport Section 106 Consultation from the FAA

**SEMINOLE TRIBE OF FLORIDA
 TRIBAL HISTORIC PRESERVATION OFFICE
 AH-TAH-THI-KI MUSEUM**

TRIBAL HISTORIC
 PRESERVATION OFFICE
 SEMINOLE TRIBE OF FLORIDA
 AH-TAH-THI-KI MUSEUM
 30290 JOSIE BILLIE HIGHWAY
 PMB 1004
 CLEWISTON, FL 33440
 THPO PHONE: (863) 983-6549
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 FAX: (863) 902-1117
 THPO WEBSITE: WWW.STOFTHPO.COM
 MUSEUM WEBSITE: WWW.AHTAHTHIKI.COM



TRIBAL OFFICERS

MARCELLUS W. OSCEO
 CHAIRMAN

MITCHELL CYPRES
 VICE CHAIRMAN

LAVONNE ROSE
 SECRETARY

PETER A. HAHN
 TREASURER

April 05, 2019

Peter M. Green, AICP
 Environmental Protection Specialist
 FAA Orlando Airports District Office
 Phone: 407-487-7296
 Email: peter.m.green@faa.gov

Subject: FAA Proposed Solar Farm (Phase II) at Tallahassee International Airport, Leon County FL
THPO #: 0031445

Dear Mr. Green,

Thank you for contacting the Seminole Tribe of Florida – Tribal Historic Preservation Office (STOF-THPO) regarding the FAA Proposed Solar Farm (Phase II) at Tallahassee International Airport, Leon County FL. The proposed undertaking does fall within the STOF Area of Interest. We have reviewed the documents provided and completed our assessment pursuant to Section 106 of the National Historic Preservation Act and its implementing authority, 36 CFR 800. We have no objections to the project at this time. However, please notify us if any archaeological, historical, or burial resources are inadvertently discovered.

Respectfully,

Victoria L. Menchaca, MA, Compliance Review Specialist
 STOF-THPO, Compliance Review Section
 30290 Josie Billie Hwy, PMB 1004
 Clewiston, FL 33440
 Office: 863-983-6549 ext 12216
 Email: victoriamentchaca@semtribe.com
 Web: www.stofthpo.com



ATTACHMENT F

City of Tallahassee Migratory Bird Management Plan



ENVIRONMENTAL POLICY & ENERGY RESOURCES

Migratory Bird Management Plan

City of Tallahassee

(January 2015)

Introduction

The purpose of this Migratory Bird Management Plan is to reduce bird injury and mortality, enhance the reliability of the City of Tallahassee's (City) electric system, and comply with federal and state bird protection laws such as the Migratory Bird Treaty Act (16 U.S.C. 703-712), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c), and the Endangered Species Act (7 U.S.C. 136, 16 U.S.C. 1531 et seq.).

Background

The City's Electric Utility is committed to enriching the quality of life in Tallahassee by providing clean and reliable electric service to its customers through a professional and diverse workforce that is committed to safe, responsible, cost effective and customer-focused operations. As a vertically integrated electric utility with ~750 megawatts (summer net capacity) of generation from two fossil fuel-fired and one hydroelectric power plant, the City owns or maintains hundreds of miles of transmission and distribution lines, numerous electric substations, and associated support equipment.

Criteria for Nest Removal

Osprey and other migratory birds sometimes use the City's electric transmission and distribution poles, substations, and other structures for perching and building their nests. While there is less risk of injury from perching due to the typical size of the birds and distance between energized and grounded parts, the nests can present safety concerns for the birds as well as operational problems for the utility. These include but are not limited to fire, equipment damage, power outages, and bird electrocution. In these cases, the City may make a determination that the nest must be removed, and if possible relocated.

While it is impossible to prevent all avian mortalities and injuries from electrocution or collision, the City engages in nest management activities to minimize these risks. This includes monitoring the number, location and types of bird or other animal electrocution on electrical equipment, identifying potential trouble spots, design and installation of nearby alternative nest boxes or platforms, and evaluating electrical structures for potential modification to discourage or prevent birds from perching or building nests.

Unlike other areas of the state or country, particularly in the western U.S., much of the City's electric service territory includes large acreage of woodlands, trees and canopy roads. These characteristics helped Tallahassee earn the Tree City USA designation by the National Arbor Day Foundation, and provide ample nesting and perching opportunities for migratory birds. Therefore, avian mortality and injury is relatively low within the City and its service area.

Inactive Nest Removal Procedure

In the event it is determined that a bird nest presents a potential safety or operational concern, the City will conduct nest removal activities in accordance with its Florida Fish and Wildlife Conservation Commission (FWCC) issued permit. While the City will make every effort to remove inactive nests during the non-breeding season when the nest is most likely to be vacant or inactive, this is not always possible.

However, these activities will occur only when the nest is confirmed to be "inactive" as evidenced by visual observation confirming the absence of any egg or dependent (flightless) young in the nest, and as further described in the FWCC's Osprey Nest Removal Policies. The visual inspection of each nest is typically conducted using an aerial bucket truck at a safe distance, and/or with binoculars.

Active Nest Removal Procedure

Under this Migratory Bird Management Plan and in accordance with the FWCC-issued permit, only inactive nests will be removed. However, in the event that an active nest must be removed due to safety or operational hazards, the City will notify the FWCC immediately and seek assistance in obtaining the required authorization and determining the proper method for removal to ensure the health and safety of the eggs or chicks. The City is not requesting at this time authorization to remove active nests.

Nest Relocation Procedure

Upon removal of the inactive nest, the City will attempt to relocate the nest to a replacement nesting structure of comparable or better quality, and in accordance with the FWCC's guidelines for construction of replacement osprey nest structures document. The replacement nest structure will be located in the immediate vicinity of the old nest, if possible. The old nest site will be modified, to the extent practicable, to prevent a new nest from being constructed. A copy of the permit and designation letter will be available onsite during removal activities and in the possession of the designated sub-permittee.

Reporting

The City will continue to include all nest removal and relocation activities in the annual report which is due to the FWCC by June 30th of each year. The report will include the date,

location, and techniques used to remove or relocate each inactive nest from a utility structure.

Florida Fish and Wildlife Conservation Commission
Division of Habitat and Species Conservation
Species Conservation Planning Section
620 South Meridian Street, Mail Station 2A, Tallahassee, FL 32399-1600
(850) 921-5990, ext. 17310

OSPREY NEST REMOVAL POLICIES



Florida Fish and Wildlife Conservation Commission OSPREY NEST REMOVAL POLICIES

A significant percentage of osprey (*Pandion haliaetus*) pairs in Florida nest on power poles or other man-made structures. Under permits issued by the Florida Fish and Wildlife Conservation Commission (Commission), a number of these nests are removed each year. This document outlines osprey nest removal policies and reporting requirements that help us determine the effects of these activities on Florida's osprey populations.

Osprey Protection and Nest Removal Regulation

The osprey is federally protected by the Migratory Bird Treaty Act (16 U.S.C. 703-712) and state protected by Chapter 68A of the Florida Administrative Code (F.A.C.). Pursuant to the federal act, it is unlawful to take, possess, buy, sell, purchase, or barter any migratory bird (including the osprey), including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations. Although both active and inactive osprey nests are protected Federally, only **active** nests require Federal permits for taking.

The specific state regulation protecting ospreys is rule 68A-4.001, F.A.C., which prohibits the taking or transporting of "...wildlife...or their nests, eggs, young, homes, or dens..." Additional state protection is provided in rule 68A-13.002, F.A.C., which adopts as state rules the federal Migratory Bird Treaty Act and all rules promulgated therefrom. Ospreys and their nests in Monroe County are provided even further protection by virtue of that population being listed as a "species of special concern" (rule 68A-27.005 F.A.C.), thereby protected by

rule 68A-27.002, F.A.C.

Exceptions to these regulations are provided in rule 68A-9.002, F.A.C., which allows the Executive Director of the Commission to issue permits authorizing the taking or possession of wildlife or their nests for management or other "justifiable purposes." Such permits are subject to any terms, conditions, or restrictions that might be prescribed.

State permits to take active and inactive osprey nests are issued for the Executive Director of the Commission by the Section Leader of the Species Conservation Planning Section, Division of Habitat and Species Conservation, 620 South Meridian Street, Mail Station 2A, Tallahassee, Florida 32399-1600. Requests for such permits may be submitted through the new [Online Permitting System](#). Federal permits to take active osprey nests are issued by the U.S. Fish and Wildlife Services Region IV, Division of Law Enforcement, Special Agent in Charge, 1875 Century Boulevard, Atlanta, Georgia 30345, (404) 679-7049. There are no provisions in state law for verbal authorizations to remove active or inactive nests. Likewise there is no provision in Federal law for verbal authorizations to remove active nests.

Description of Permit Conditions

1. Only *inactive* nests may normally be taken. Inactive nests may be determined by the absence of any egg or dependent (i.e., flightless) young in the nest. Permittees may take inactive osprey nests at any time while the permit is

valid.

2. Replacement nesting structures of comparable or better quality than the nest support structure removed or destroyed must normally be erected by the permittee. The replacement nest structure shall be located in the immediate vicinity of the old nest, if possible. Extenuating circumstances may prevent the placement of a replacement nest structure. In these circumstances, the permittee shall explain why replacement is not an option on the Species Conservation Planning Section application and the situation will be reviewed on a case by case basis. *Suggested* guidelines for constructing replacement osprey nest structures are attached, but other designs may be used if the permittee prefers.
3. The permit is not transferable, but other qualified personnel designated and instructed by the permittee may assist in the permitted activities.
4. The permit must be readily available for inspection at all times while engaging in the permitted activities.
5. The permit does not authorize access to any public or private properties.
6. Permits include an expiration date, but are subject to revocation prior to that time pursuant to Chapter 120, F.S.

Reporting Requirements

Blanket permittee holders are required to submit annual reports to the Species Conservation Planning Section documenting all nest removal. Permittees removing only 1 nest are exempted.

1. Complete 1 report form for each re-located nest site or replacement nest structure **during the nesting season immediately following nest removal (See attachment)**.
2. Enter the state nest removal permit number(s) and the full name of the permittee. Enter the unique identifier for the nest site as used in your records to differentiate among osprey nest sites. Give a brief but accurate written description of the replacement nest site location with enough detail to allow our personnel to locate the nest structure. Enter the county.
3. Record the dates the original osprey nest was removed and the replacement nest structure was erected.
4. Send completed forms to: **The Florida Fish and Wildlife Conservation Commission, Division of Habitat and Species Conservation, Species Conservation Planning Section, Protected Species Permit Coordinator, 620 South Meridian Street, Mail Station 2A, Tallahassee, Florida 32399-1600**, or email to WildlifePermits@myFWC.com by June 30 each year.

These data will be used to assess the overall success of our nest removal policies and are designed to help us better manage Florida's osprey population.

Records

The Division of Habitat and Species Conservation in Tallahassee maintains a file of permits to take osprey nests.

Enforcement

Enforcement of illegal nest take (active or inactive) and permit adherence is the responsibility of the Commission's Division of Law Enforcement.

Acknowledgements

This report was prepared by Ms. Susan Ce-
rulean and Mr. Brian Millsap of the Florida
Fish and Wildlife Conservation Commis-
sion. Review and comments were provided

by Mr. Don Wood, Major Kyle Hill, Ms.
Julie Hovis, Dr. Doug Runde, and Dr. Brad
Gruver of the Commission. Helpful com-
ments were also provided by Dr. Michael
Collopy, Mr. Mark Westall, and Mr. Peter
Quincy.

This report was revised by Ms. Angela T.
Williams of the Florida Fish and Wildlife
Conservation Commission, Species Conser-
vation Planning Section, in response to
changes in Federal policy.

*Effective July 1, 2004 the Florida Fish and Wildlife Conservation Commission (Commission) restructured as follows:

- Division of Wildlife (DOW) became Division of Habitat and Species Conservation (HSC)
- Bureau of Wildlife Diversity Conservation (BWDC) became the Species Conservation Plan-
ning Section (SCPS)

These changes are reflected throughout this document.

GUIDELINES FOR CONSTRUCTION OF REPLACEMENT OSPREY NEST STRUCTURES

The Florida Fish and Wildlife Conservation Commission requires that osprey nests removed under migratory bird permits be replaced by replacement structures of comparable or better quality. The reasons for this policy are two-fold. First, it helps ensure that osprey populations will not decline as a result of nest removal activities. Second, ospreys are strongly attached to nest sites, and will often rebuild a nest in the undesirable location unless a superior site is provided nearby.

An acceptable replacement nest structure and site meet the following conditions:

1. It is as tall or taller than the original nest site. If the original nest support structure is to be removed, the replacement structure should be as tall or taller than other surrounding structures. The alternative nest structure should never be less than 15 feet above ground.
2. It is located as close as possible to the original nest site (no further than 300 feet, and preferably less than 150 feet).
3. It is in an exposed location (e.g., not under or within the canopy of a tree).
4. It consists of a suitable platform mounted securely on an adequate support structure.
 - a. The platform and structure should be capable of supporting a nest that may weigh 100 to 200 pounds.
 - b. The platform may be either circular or rectangular. Rectangular plat-

forms should have side dimensions of no less than 2 feet on any side, with a minimal 3 foot diagonal. Circular platforms should have a diameter of at least 3 feet.

- c. Whenever possible, the old nest should be relocated intact onto the new platform. When this is not feasible, arrange sticks in the shape of a nest on the platform.
- d. Pole-top mounted nest platforms are preferred replacements for nests on power transmission poles, light poles, etc.

If the support structure for the original nest is to be left intact, it should be modified to discourage ospreys from rebuilding. This is best accomplished by covering the original nest site with material that will prevent ospreys from perching. Flexible rubber highway detour cones work well on open structures (such as power pole crossarms) if they are placed close together and cover all the potential nesting surface.

Woodworking for Wildlife: Homes for Birds & Mammals by Carrol L. Henderson contains diagrams for building raptor platforms.

Osprey policies.doc
Revised Nov 2009



Migratory Bird Nest Removal

FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION
Division of Habitat and Species Conservation, Species Conservation Planning Section
620 South Meridian Street, MS 2A, Tallahassee, FL 32399-1600, (850) 921-5990

Permit Owner Name: City of Tallahassee
Permit Owner Address: 300 South Adams Street
TALLAHASSEE, FLORIDA
32301 UNITED STATES

Permit Number: LSNR-12-02030A
Effective Date: February 20, 2015
Expiration Date: December 31, 2017

IS AUTHORIZED TO:

Remove inactive (containing no eggs or flightless young) nest(s) of osprey and nonlisted migratory bird species (excluding Bald eagles [*Haliaeetus leucocephalus*]) in Florida pursuant to Rules 68-1, 68A-4.001, 68A-9.002, 68A-16 and 68A-27, F.A.C. and the Florida Fish and Wildlife Conservation Commission's (FWC) Osprey Nest Removal Policies.

AUTHORIZED LOCATION(S): Facilities and structures maintained by the City of Tallahassee (represented by Mr. John Powell), Leon County, Florida.

Permittee Signature: John K. Powell Date: February 20, 2015

Not valid unless signed. By signature, confirms that all information provided to issue the permit is accurate and complete, and indicates acceptance and understanding of the provisions and conditions listed below. **Any false statements or misrepresentations when applying for this permit may result in felony charges and will result in revocation of this permit.**

Authorized By: Angela Williams Authorized for: Nick Wiley, Executive Director

Authorizing Signature: _____ Date: 02/19/2015
Species Conservation Planning Section

PERMIT CONDITIONS AND PROVISIONS:

- 1 The Permittee is authorized to remove inactive osprey (except for Monroe County) and other nonlisted migratory bird nests [(except Bald eagles (*Haliaeetus leucocephalus*))] **situated on City of Tallahassee power transmission structures and facilities from the above authorized location in association with routine facility and equipment maintenance, pursuant to the enclosed Osprey Nest Removal Policies.**
- 2 **Nesting debris (i.e. twigs, prey remains, foreign substrates, etc.) and inactive nests of osprey and other nonlisted migratory birds [excluding Bald eagles (*Haliaeetus leucocephalus*)] situated on facilities or structures maintained by the Permittee, may be removed in association with emergency or routine maintenance. The Permittee is not required to replace nesting debris or nonlisted migratory bird nests but may replace osprey nests at his/her discretion when feasible.**
- 3 When the Permittee determines that replacement is feasible, nesting structures of comparable or better quality than the nest support structure removed or destroyed must be erected by the Permittee. **The replacement nest structure shall be located in the immediate vicinity of the old nest**

within 2 months of nest removal. Guidelines for constructing replacement osprey nest structures are available on various avian habitat websites.

- 4 The Permittee may 1) relocate all or part of the existing nest(s) to the replacement platform(s) when applicable or 2) donate the nest(s) to FWC permitted/licensed educational or scientific facilities or properly destroy the structures by trash disposal, burial or incineration.
- 5 Any injury and/or mortality of listed species must be reported to this office within 48 hours via fax at (850) 921-1847 or email at wildlifepermits@myfwc.com. **Disposition of those specimens is subject to individual approval by the Commission.**
- 6 This permit does not authorize taking of nests of state **listed Threatened species or Species of Special Concern** [see Titles 68A-27, Florida Administrative Code (F.A.C.) for complete listing of excluded species] or **Bald eagles** [*Haliaeetus leucocephalus*] 68A-16.002 F.A.C, other than those indicated in the **above provisions. Permits for removal of these species must be secured separately. In such cases, contact the Permit Coordinator at the address given above.**
- 7 The activities authorized under this Permit may be carried out by the Permittee or Authorized Agent (if applicable) and any employee or contractor under their control as Subpermittees/Assistants. **Accordingly, all such activities are the responsibility of the Permittee or Authorized Agent. The Permittee and Authorized Agent shall be as fully responsible for any such activities to the same extent as if they had themselves carried out those activities under this Permit. The Permittee or Authorized Agent shall submit the name and contact information of designated Subpermittees/Assistants to the Protected Species Permit Coordinator at wildlifepermits@myfwc.com prior to that Subpermittee/Assistant conducting any activities authorized under this permit. The FWC reserves the right to deny a Permittee's designation of an individual as its Subpermittee/Assistant for just cause.**
- 8 **This office no longer requires a permit for species listed under the federal Endangered Species Act (ESA). Federal authorization or permit(s) must be obtained from the United States Fish and Wildlife Service (USFWS) before embarking upon activities involving or impacting ESA and other federally protected species.**
- 9 **This permit does not authorize access to any public or private properties. The Permittee (and his designee) must secure permission from the appropriate landowner or land manager prior to conducting any activity authorized under this permit.**
- 10 This permit is nontransferable **and must be prominently posted on the Project site or carried on authorized individual's person for inspection by all authorized officials (including but not restricted to FWC, USFWS, local building and zoning, law enforcement) at all times while engaging in the permitted activities.**
- 11 The Permittee by signature above confirms that representatives of the Florida Fish and Wildlife Conservation Commission (Commission) have his/her permission as the Permittee, and that of the landowner(s) to enter on and inspect the property(ies) described in the application (herein incorporated by reference) and any documents associated with this permit for all reasonable purposes pertaining to applicable Commission rules.
- 12 **This permit is in effect a continuation of permit LSNR-12-02030 which expired December 31, 2014 and supersedes all previous versions.**
- 13 An annual report of all activities detailing the number of nest taken, dates, nest status, location and final disposition of the nest pursuant to this permit must be submitted to this office by June 30 of each year commencing 2015. Said reports should be directed to the Protected Species Permit Coordinator, Species Conservation Planning Section, by email at wildlifepermits@myfwc.com. **Requests for permit renewal should be submitted at least 45 days prior to the time it is needed in the online permit system. All permit renewal (or amendment) requests must contain a copy of the above referenced report. Copies of any other reports or publications, which result from the work, must also be provided upon their availability.**
- 14 This permit can be suspended, revoked or not renewed for just cause, pursuant to 68-1.010, Florida Administrative Code and Chapter 120, Florida Statutes.

A person whose substantial interests are affected by FWC's action may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. A person seeking a hearing on FWC's action shall file a petition for hearing with the agency within 21 days of receipt of written notice of the decision. The petition must contain the information and otherwise comply with section 120.569, Florida Statutes, and the uniform rules of the Florida Division of Administration, chapter 28-106, Florida Administrative Code. If the FWC receives a petition, FWC will notify the Permittee. Upon such notification, the Permittee shall cease all work authorized by this permit until the petition is resolved. The enclosed Explanation of Rights statement provides additional information as to the rights of parties whose substantial interests are or may be affected by this action.



ATTACHMENT G

Public Comments and Responses

The draft Environmental Assessment was made available for a 30-day public review on March 23, 2019. The Notice of Availability of the Draft Environmental Assessment was published in the Tallahassee Democrat, a daily newspaper in Tallahassee, Florida on March 24 and 27, 2019. Printed copies of the Draft EA were also made available at two Leon County libraries namely, Fort Braden Branch Library and Dr. BL Perry Jr. Branch Library. A copy of the Draft EA was also available at the Utility web site and Tallahassee International Airport web site with a link to the Draft EA. A printed copy of the Draft EA was also available for review at Tallahassee International Airport during regular working hours.

No comments to the Draft Environmental Assessment were received from the public during the public comment period, which was open to all comments received or postmarked no later than April 22, 2019.

ATTACHMENT H

Summary of Comments Received and Responses to Comments

SUMMARY OF COMMENTS RECEIVED AND RESPONSES TO COMMENTS

Comment	Response
<p>USDA Forest Service</p> <p>1. Location of three new utility poles in existing easement and ROW - would require additional mitigation measures prior to prescribed burns. Alternative location is recommended or if this is unfeasible it is recommended that the area around the poles be mowed on a frequent basis.</p> <p>2. Recommend a plow line be created around the solar farm in event a prescribed fire spots over onto airport property.</p>	<p>1. Placement of the three-pole structure was dictated by National Electric Safety Code and reliability operating requirements. Location of the structure was selected to minimize the installation outage impact to the critical 230KV transmission line interconnection with Duke Energy and satisfy National Electric Safety Code requirements (minimal clearance between new transmission structure and existing transmission line). The three-pole structure uses steel poles that will be separated from the adjacent National Forest by an existing firebreak. For these reasons, more frequent mowing of the ROW is not necessary and potential for damage by fire is eliminated.</p> <p>2. A 10-to 12-foot-wide access road will be constructed around the perimeter of the solar farm. This will serve the same function as a plow line to prevent spread of fire during prescribed burns.</p>
<p>U.S. Fish and Wildlife Service</p> <p>1. In the extremely unlikely event you see an indigo snake in one of the tortoise burrows, you would need to stop work and contact us.</p> <p>2. Please provide us with the draft EA once it is available for review.</p>	<p>1. Contractor will be required to follow the USFWS' <i>Standard Protection Measures for the Eastern Indigo Snake</i> during site preparation and construction.</p> <p>2. Draft EA was provided on March 22, 2019, no additional comment has been received as of May 7, 2019.</p>
<p>Florida Department of Environmental Protection</p> <p>1. Project will require an Environmental Resource Permit if there will be any new access roads or if the solar panels are installed on an impervious base.</p>	<p>1. The Environmental Resource Permit Application for the project is currently under review by the Florida Department of Environmental Protection. Construction will not begin until the after the permit has been obtained.</p>

Comment	Response
<p>Florida Department of State, Division of Historical Resources</p> <p>1. If prehistoric or historic artifacts, such as pottery or ceramics, projectile points, dugout canoes, metal implements, historic building materials, or any other physical remains that could be associated with Native American, early European, or American settlement are encountered at any time within the project site area, the project shall cease all activities involving subsurface disturbance in the vicinity of the discovery. The applicant shall contact the Florida Department of State, Division of Historical Resources, Compliance Review Section at (850)-245-6333. Project activities shall not resume without verbal and/or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Section 872.05, Florida Statutes.</p>	<p>1. The contractor will be required comply with these directives throughout the construction of the project. If prehistoric artifacts or physical remains as described are found, work will cease, and the Compliance Review Section will be contacted. If unmarked human remains are found work will cease and City of Tallahassee Police Department will be notified.</p>
<p>Florida Department of Transportation</p> <p>1. Project should be in compliance with 14 CFR Part 77 and Chapter 333 Florida Statutes.</p>	<p>1. A 7460 airspace analysis was conducted for the project to ensure that there will be no airspace obstructions because of the project. This was approved by the FAA on April 18, 2019. In addition, the City of Tallahassee issued a Land Use Compliance Certificate for the project on September 5, 2018. Official zoning approval will come with the approval of the Site Plan. This has been submitted and construction will not proceed until after the Site Plan approval has been received.</p>

Comment	Response
<p>Florida Fish and Wildlife Conservation Commission</p> <p>1. Survey site for gopher tortoise prior to construction and contact permitting staff to obtain necessary gopher tortoise permits.</p>	<p>1. A 100 percent survey for gopher tortoise has been conducted at the site and work has begun to complete the gopher tortoise conservation permit application for the project. No construction will occur until the permit has been obtained and affected gopher tortoise burrows have been excavated and tortoises relocated per the conditions of the permit.</p>
<p>Florida State Clearinghouse</p> <p>1. Based on the submitted documentation it appears that the project may require authorization under Rule 62-330, FAC for stormwater treatment from the Florida Department of Environmental Protection.</p> <p>2. If prehistoric or historic artifacts, such as pottery or ceramics, projectile points, dugout canoes, metal implements, historic building materials, or any other physical remains that could be associated with Native American, early European, or American settlement are encountered at any time within the project site area, the project shall cease all activities involving subsurface disturbance in the vicinity of the discovery. The applicant shall contact the Florida Department of State, Division of Historical Resources, Compliance Review Section at (850)-245-6333. Project activities shall not resume without verbal and/or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Section 872.05, Florida Statutes.</p> <p>3. The state has no objections to allocation of federal funds for the subject project and, therefore, the funding award is consistent with the Florida Coastal Management Program.</p>	<p>1. The Environmental Resource Permit Application for the project is currently under review by the Florida Department of Environmental Protection. Construction will not begin until the after the permit has been obtained.</p> <p>2. The contractor will be required comply with these directives throughout the construction of the project. If prehistoric artifacts or physical remains as described are found, work will cease, and the Compliance Review Section will be contacted. If unmarked human remains are found work will cease and City of Tallahassee Police Department will be notified.</p> <p>3. Noted.</p>

Comment	Response
<p>Northwest Florida Water Management District</p> <p>1. FDEP will be conducting the ERP reviews for this project.</p>	<p>1. Noted.</p>
<p>City of Tallahassee Growth Management Department</p> <p>1. Will need to transplant 10 to 20 percent of bent golden aster on-site and provide some restoration to the existing gopher tortoise area at the airport.</p> <p>2. Everything is on the right track for NFI/EIA approval.</p>	<p>1. FL Solar 4 has conducted the 100 percent gopher tortoise survey and is working with the City of Tallahassee Growth Management Department to finalize mitigation for the project for bent golden aster. Construction will not begin until after the City's Environmental Management Permit has been issued.</p> <p>2. Noted.</p>
<p>Muscogee (Creek) Nation</p> <p>1. No objections to the proposed project.</p> <p>2. Should cultural material or human remains be encountered during ground disturbance, construction or demolition, we request to be notified.</p> <p>3. If there are any additional updates, we ask to be informed of these.</p>	<p>1. Noted.</p> <p>2. Muscogee Nation will be notified if cultural material or human remains are encountered during ground disturbance, construction or demolition.</p> <p>3. If there are any updates that could affect cultural or archaeological resources, coordination with the Muscogee (Creek) Nation will be initiated.</p>
<p>Seminole Tribe of Florida</p> <p>1. We have no objections to the project at this time.</p> <p>2. Please notify us if any archaeological, historical, or burial resources are inadvertently discovered.</p>	<p>1. Noted.</p> <p>2. Seminole Tribe of Florida will be notified if archaeological, historical, or burial resources are inadvertently discovered.</p>