SOUTH FLORIDA WATER MANAGEMENT DISTRICT

October 31, 2011

VIA EMAIL
Cindy.Mulkey@dep.state.fl.us

Ms. Cindy Mulkey
Administrator, Siting Coordination Office
Department of Environmental Protection
Mail Station 48
3900 Commonwealth Blvd.
Tallahassee, Florida 32399

Dear Ms. Mulkey:

Subject: Florida Power & Light (FPL) Turkey Point Units 6 & 7, PA03-45A3
SFWMD Preliminary Statement of Issues
Proposed Plant and Associated Non-Transmission Facilities

In accordance with the Florida Electrical Power Plant Siting Act, Section 403.507(1), F.S., the South Florida Water Management District (SFWMD) submits the following preliminary issues associated with the Florida Power & Light (FPL) Turkey Point Units 6 & 7 proposed plant and associated non-transmission facilities.

Major components of the proposed plant and non-transmission facilities are on-site construction activities, radial collector wells, reclaimed water pipeline and roadway improvements. SFWMD issues are presented accordingly. This SFWMD Preliminary Statement does not necessarily constitute a final comprehensive set of issues. If additional issues arise during ongoing SFWMD review and analysis of the proposed project, they will be addressed in the SFWMD agency report, as allowed by Chapter 403.507(1), F.S.

On-Site Construction Activities

FPL presented a construction approach that necessitates dewatering at the Units 6 & 7 power block areas site of the aquifer to a depth in excess of forty (40) feet below land surface. The dewatering process would need to 1) lower the water table within the footprint of the plant facilities to the target dewatering depth and 2) maintain that depth for the duration of construction of below-ground features. Water would be pumped from the excavated area and routed to the cooling canals of the industrial wastewater facility (IWF). FPL's response to questions raised during Completeness Review about possible impacts to water resources from disposal of large volumes of water associated with dewatering into the cooling canal system included technological fix that minimizes the volume of pumpage necessary to establish and maintain a dewatered state.

SFWMD is concerned about the fate and transport of materials excavated from the proposed expansion of the existing barge unloading area within the turning basin area adjacent to Biscayne Bay.

Radial Collector Wells

FPL proposes a radial collector well (RCW) system as a secondary water source when reclaimed water not available in sufficient quality and quantity. FPL included a conceptual design of the RCW system as part of its Site Certification Application. The proposed

infrastructure has four caissons each collecting water from 8 horizontal lateral wells 25 to 40 feet below the bottom of Biscayne Bay. The actual depth would depend on location of the high-transmissivity zone.

SFWMD has concerns about effects to Biscayne Bay and adjacent wetlands associated with the construction and operation of the radial collector wells (RCWs) and the high concentration of salts, dissolved organic matter, nutrients, and constituents in the nearby industrial wastewater facility.

Reclaimed Water Pipeline

The "Joint Participation Agreement Between Miami-Dade County and FPL Providing for Development of a Reclaimed Water Project" (Participation Agreement) is proposed to provide reasonable assurances that a consistent and sufficient quantity of reclaimed water will be supplied to FPL for its primary cooling water needs for the plant. The Participation Agreement appears to set forth conceptual ideas for a future contract for the reclaimed water. Under the future Reclaimed Water Project Contract both Miami-Dade County and FPL have the purported rights to cancel the contract at will. This raises concerns as to the certainty of the consistent and sufficient supply of the primary source of cooling water.

L-31E is a federally designated levee constructed as part of the Central and Southern Florida Project, of which SFWMD is the local, non-federal sponsor responsible for operation and maintenance. Segments of the FPL Eastern Corridor include L-31E and associated SFWMD rights-of-way. FPL anticipates that a portion of the reclaimed water pipeline could be routed parallel to L-31E and within the L-31E right-of-way. This routing as well as any perpendicular crossing of the levee would require Section 408 review and approval from the USACE. Such installations must meet USACE setback requirements and construction standards for federal levees and not compromise the integrity of the levee. While transmission line crossings are allowable under SFWMD Right of Way Permitting Criteria, parallel-run transmission lines (i.e., the reclaimed water pipeline) would require a waiver of criteria. SFWMD prefers that FPL utilize its own right-of-way (which runs parallel and adjacent to L-31E) for a parallel run reclaimed water pipeline.

Roadway Improvements

SFWMD has concerns about potential impacts to Phase II Biscayne Bay Coastal Wetlands project restored flows, potential impacts to hydrology of District-owned lands (Model Lands), exposure of District-owned lands to illegal dumping, off-road vehicles and vandalism to District property, potential impacts to hydraulic conveyance of SFWMD canals and coastal structures (for example S-20F, sections downstream of S-20), and potentially reduced flood protection to areas in Homestead.

We will continue to work with FPL on these issues and further refine in our proposed conditions and agency report for Units 6 & 7.

Sincerely,

Terrie Bates
Director, Water Resources Division
South Florida Water Management District