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FEB 20 1992

February 17, 1992

Ms. Trudie D. Bell
Environmental Supervisor
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Ms. Bell:

RE: PA 89-25 Hardee Power Station - Arcadia to Lee Substation Transmission Line ROW.

In response to your letter of January 15, 1992 concerning the ROW location for the Arcadia (actually DeSoto/Charlotte County Line - Lee transmission line, we have the following comments. We have only been able to make one change that you requested in part due to our earlier efforts to minimize wetland impacts. We are limited to specific distances for span widths and are not able to go beyond the engineering limits. Your questions are printed in small type.

1. The wetland boundaries of the river shown on sheets 45 and 46 are not marked. Please provide a copy of these two aerial photographs with the wetland boundaries indicated.

Apparently these boundaries were inadvertently left off of your copies. Please refer to the attached sheets.

2. On sheet 46, there appears to be a wetland system that runs east and west through the southern portion of the aerial photograph. Please clarify what the system is.

The centerline is shown on the accompanying soils map which indicates that the forested lineation is soils type 33 or 34 (Oldsmar or Malabar Fine Sand), typically associated with broad flatwood areas (sawpalmetto and slash pine). The soils photograph (1981) also shows the patchy forested area as being less suggestive of a linear system. Dames & Moore did the field investigations for this area and did not find any wetland vegetation.

3. On sheet 54, please relocate the second structure from the south to the upland spit adjacent to the existing road.

to move the location of the second structure or the third (near the road) due to the spans in this portion of the their maximum widths. In order to move this structure we

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would have to relocate the structure approximately 80 feet to the north which is beyond the capability of this type of structure. Please note that there will be no fill associated with this structure except for the "H" frame poles. These wetlands are wet prairies and should not be severely damaged by this limited fill.

4. On Sheet 55, please relocate PI-52 to the adjacent upland.

PI-52 is located directly adjacent to existing roads (disturbed areas) and will not include any fill except for the "H" frame structures themselves. Since relocating a PI requires different angles and possibly a differently designed structure, we request that this location be maintained.

5. On Sheet 57 please adjust the spans of the southern three structures to avoid the wetland.

This is a highly disturbed area with an existing ditch and adjacent road that has disrupted historical hydrological connections. The wetland is a wet prairie and will be only slightly impacted by the single structure required. Additionally, we would have to move the structure a minimum of 300 ft. in order to avoid the wetlands and are unable to do this due to limited span length for single poles.

6. On Sheet 60, please move the second structure from the north out of the wetland.

The location of this PI (65A) is limited from the south by a structure that is located in an upland in order to avoid a wetland. The PI to the north is also located in an upland in order to avoid a wetland area. Please understand that we tried to avoid all wetland impacts but were unable to in this specific location. This structure is located in a wet prairie and the only fill will be the "H" frame poles.

7. On Sheet 61, please move the north structure out of the wetland.

In order to move this structure out of the wetland we would have to relocate it 80 ft. to the north which is beyond the maximum span length for these structures. Please understand that the only fill associated with this structure is the "H" frame poles themselves.

8. On Sheet 62, please move the second structure from the north to the adjacent upland.

In order to move this structure out of the wetland we would have to relocate it 30 ft. to the north which is beyond the maximum span length for these structures. Please understand that the only fill associated with this structure is the "H" frame poles themselves.

9. On sheet 63, please adjust the spans of the northern four structures to get structures 2 and 4 from the north out of the wetland.

In order to move these structures adequately to avoid wetland impacts we would have to add structures. These span lengths are currently maximized in order to avoid wetland impacts and to address economic considerations. Adding additional structures would result in increased construction activity in wetlands and we feel would be contrary to the conditions of certification. Please understand that the impacts associated with these

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structures is limited to the "H" frame poles and no other fill.

10. On sheet 65, please relocate the first structure east of PI-68 out of the wetland.

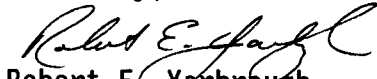
This structure can and will be relocated approximately 20 feet to the west in order to avoid wetland impacts.

11. On sheet 69, please adjust the spans between PI 75A-1 and PI 75A to move the structure between them out of the wetland.

In order to move this structure out of the wetlands we would have to move it 120 ft. west which is beyond the capability of the structure due to maximized span widths.

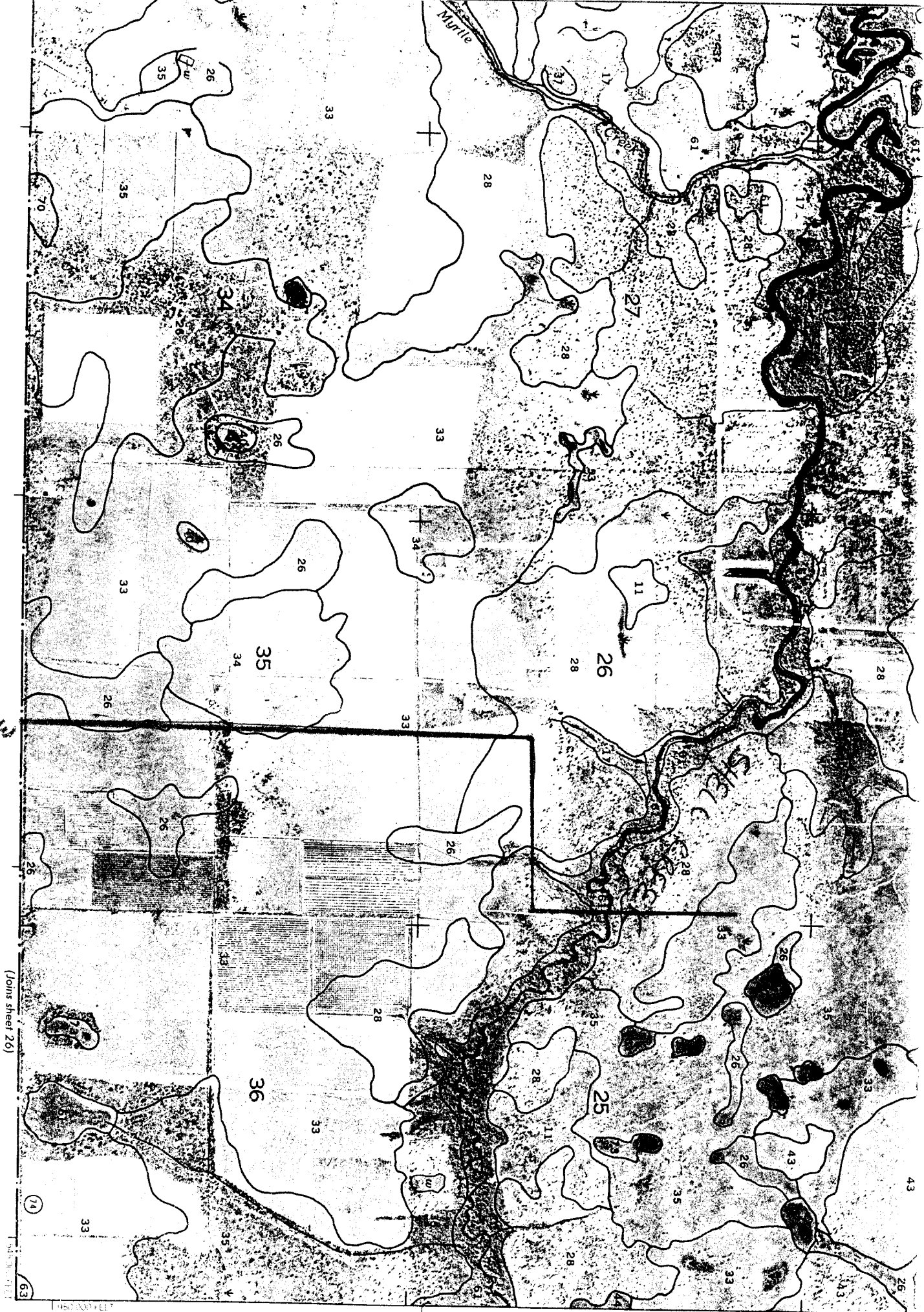
Please understand that we have done all that we feel is feasible to avoid wetland impacts wherever possible. We appreciate your input into this process but are unable at this time to make all of the changes that you have suggested. Please contact us if you have any additional concerns.

Sincerely,


Robert E. Yarbrough
Environmental Engineer

cc: Buck Oven, Siting Coordination Office DER

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[Joins sheet 16]

[Joins sheet 26]

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