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July 7, 2008

Mr. Mike Halpin, P.E.
Siting Administrator
FL Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Progress Energy Florida - Levy Nuclear Plant Site Certification Application

Dear Mr. Halpin:

The staff of the Tampa Bay Regional Planning Council has reviewed the above-referenced application, which was submitted to us on June 2, 2008 by Progress Energy Company. The application has been reviewed for consistency with the *Future of the Region, A Strategic Regional Policy Plan for the Tampa Bay Region (2005)*, including the adopted maps of Natural Resources of Regional Significance within our region. Within our region the applicant proposes to construct electric transmission lines in Pinellas and Hillsborough counties, including the cities of Tampa, Plant City and Oldsmar. The review was restricted to the portion of the project within this area.

We find the application incomplete, and request that our concerns and questions be addressed by the applicant.

PROJECT DESCRIPTION

Within the Tampa Bay region the project proposed for corridor certification is an electric transmission line to connect the existing Griffin and Lake Tarpon substations in Polk and Pinellas counties, respectively. The length of the corridor under consideration is approximately 39 miles, and the width varies from approximately 300 feet to 1,000 feet wide centered on the existing rights-of-way. The proposed 230 kV transmission line will be located within the existing 115 kV transmission line right-of-way from the Griffin substation in western Polk County to the Lake Tarpon substation in eastern Pinellas County. Within this length it is likely that the existing lattice structures will be replaced by monopole structures, requiring additional mid-span, single-shaft structures.

The 230 kV transmission line will be strung on single-shaft tubular steel or spun concrete structures 80 - 145-feet tall and 500 to 1,400 feet apart. The transmission line will be a minimum of 29 feet above the ground between structures. The anticipated right-of-way needed for the new transmission is 100 feet.

CONCERNS

1. The preferred corridor crosses a number of vegetative communities identified as Natural Resources of Regional Significance in the *Future of the Region, A Strategic Regional Policy Plan for the Tampa Bay Region (2005)* (See the attached maps). Alignment along or within existing transmission line right-of-way will allow impacts to natural resources to be minimized.
2. Consistency with the applicable goals and policies of the Tampa Bay Regional Planning Council, as found in the *Future of the Region, A Strategic Regional Policy Plan for the Tampa Bay Region (2005)*, including with regard to impacts to natural resources of regional significance and the addition of transmission lines in close proximity to residential areas and recreational facilities.

QUESTIONS

1. Please discuss how the project within Hillsborough and Pinellas counties will become consistent with the following adopted Council goals and policies, from the *Future of the Region, A Strategic Regional Policy Plan for the Tampa Bay Region (2005)*:

2.19: Consider existing and future land use plans when siting public and semi-public facilities of affected jurisdictions and appropriate agencies and the impact on the quality of life of any adjacent residential neighborhood(s).

4.43: Protect, preserve, and restore all regionally-significant natural resources shown on the Map of Regionally-Significant Natural Resources.

4.44: Allow impacts to regionally-significant natural resources only in cases of overriding public interest and when it is demonstrated and/or documented that mitigation will successfully recreate the specific resource. Mitigation should meet the following ratios, at minimum:

- FNAI Natural Communities 3:1
- LULC Habitat Dry 2:1
- LULC Habitat Wet 3:1

4.45: Ensure that mitigation by habitat re-creation employs native plant material which provides the same natural value and function. Monitor mitigation areas for a sufficient time to ensure success: a minimum 85 percent final coverage of desired species. Yearly maintenance and replanting should be undertaken to ensure final cover as necessary.

4.46: Recognize that, consistent with other policies in this section, permitted mitigation banking shall set the criteria for impact mitigation.

4.47: Recognize that mitigation efforts shall be:

- Performed within the same drainage basin where the unavoidable impact to regionally significant wetlands occurs; and
- Allowed only after avoiding impact to the greatest extent possible; and that habitat creation, restoration, and enhancement, with long-term management, be considered as viable methods of impact mitigation.

4.48: Mitigation by restoring disturbed habitat of a similar nature, including the removal of exotic plant species, may be acceptable. The minimum acceptable ratio should be twice the habitat re-creation ratio set forth in policy 4.44.

4.57: Ensure that land use decisions are consistent with federal- and state-listed species protection and recovery plans, and adopted habitat management guidelines.

4.136: Hold recreation and park sites inviolate against diversion to other uses, except in cases of overriding public interest.

4.138: Protect the natural resources of regionally-significant parks, greenways, preserves, and conservation lands from incompatible land uses adjacent to these areas. Include pedestrian trails, where appropriate.

2. Please provide a description of how the proposed project will meet each section of the Hillsborough and Pinellas counties and the Tampa, Plant City and Oldsmar Land Development Codes, in order to reduce the necessity of conditions of certification.
3. What will be the source and noise level of the proposed transmission facility that will require an exemption to the Hillsborough and Pinellas County noise ordinances?
4. Were the studies conducted for the siting of the existing transmission line reviewed for insights into the natural features along the corridor? Were any high quality or unique features identified in the previous surveys visited during the process of preparing this TLS application?
5. If surveys are not conducted for listed species (plant and animal) or archaeological/historical/cultural resources prior to right-of-way selection, how can the potential impact to listed species be determined and used as a selection criterion? Please describe the methodology that will be used to locate these species prior to final right-of-way selection so that potential impacts can be identified and avoidance/minimization/mitigation measures determined.
6. The listed species information on pages 9-A8-38 - 44 describes the potential for occurrence of each listed species within the PHP corridor. There is no discussion as to whether the corridor provides breeding, nesting, or feeding habitat, and so it is not possible to determine if use as a transmission corridor would have an impact on the species which should be minimized, avoided or mitigated. Please provide more information on the use of the habitats within the corridor by each listed species, and the likelihood of impact to those species by right-of-way clearing, construction, operation and maintenance of a 230 kV transmission line. Information on the use of the existing, maintained right-of-way by listed species would be very useful in this regard.
7. Please describe the techniques and frequencies which will prevent invasive or nuisance species from vegetating the newly-cleared right-of-way or displacing native species within the right-of-way.

Upon receipt of sufficient responses to these concerns and questions, the staff of the Tampa Bay Regional Planning Council will provide recommendations concerning certification of the proposed corridor and the project.

Please require the applicant to forward any additional information, as well as all responses to other agencies' questions, to the Tampa Bay Regional Planning Council for further review.

And please contact me (727-570-5151 x 32 or suzanne@tbrpc.org) if there are any questions about this review.

Sincerely,

A handwritten signature in black ink that reads "Suzanne J. Cooper". The signature is written in a cursive, flowing style.

Suzanne T. Cooper, AICP
Principal Planner

enclosure

cc: Patricia Bean, Hillsborough County Administrator
Fred Marquis, Interim Pinellas County Administrator
Bruce Haddock, Oldsmar City Manager
Derrell Smith, City of Tampa Chief of Staff
David Sollenberger, Plant City Manager





