

City of Miami



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October 15, 2009

Mr. Michael P. Halpin
Program Administrator
Office of Siting Coordination
Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-2400

RE: Site Certification Application
Florida Power & Light – Turkey Point Units 6 and 7
DOAH Case No. 09-3575 ETP

Dear Mr. Halpin:

Representatives of The City of Miami (“CITY”), both staff and elected officials, have brought forth concerns and objections through various meetings and workshops to representatives of Florida Power and Light (“FPL”) related to the transmission line corridor. Additionally, “new” information was brought to light after every subsequent meeting and workshop, which created additional issues and concerns for the CITY and goes to show the incompleteness of FPL’s Site Certification Application (“SCA”). Moreover, the CITY has reviewed FPL’s additional information submitted to the Department of Environmental Protection (“DEP”) regarding the completeness of the transmission portion of the SCA and has determined that FPL has not adequately responded to the CITY’s concerns. Therefore, pursuant to Section 403.5353(4), Fla. Stat., the CITY recommends that the application is not complete at this time for the reasons listed herein.

The CITY incorporates all its questions and issues from its Completeness filings of July 30, 2009 and September 3, 2009 and hereby states as follows:

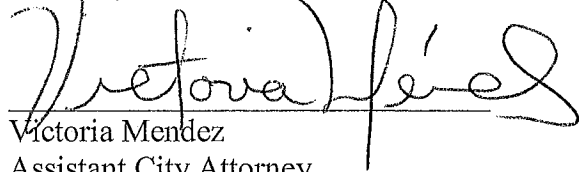
- FPL representatives indicated that certain expressways had been evaluated as potential route possibilities, yet the application provides no hard evidence of these evaluations. The application lacks 1) descriptions of specific expressway routes that were considered; 2) criteria used in the evaluation; 3) the weight given to each of the various criteria; 4) how these criteria were applied to compare the suitability of expressway versus non-expressway routes; 5) evidence of a scoring system that would allow comparative analysis; 6) route rankings; and 7) specific quantitative and qualitative data that would eliminate any and all expressway routes from consideration in comparison with other alternatives.

- FPL's APPLICATION fails to show what the proposed lines will really look like as they run down U.S.1: 1) what weight has been given to general aesthetics, or specific concerns relating to redevelopment; 2) what weight has been given to the objections of citizens and government leaders on the U.S. 1 transmission line route. The application is silent. As a practical matter, FPL's application is incomplete for its apparent failure to consider and weigh aesthetic and quality of life factors for those impacted.
- Describe what efforts are being taken to reduce the visual and aesthetic impacts of the transmission line along the corridor.
- Location of all supporting, single circuit and double circuit poles.
- Identification of individual pole heights by pole location. Poles heights are identified as ranging from 80-105 feet.
- The APPLICATION proposes establishing corridors in which transmission lines may be located. This approach provides broad latitude for the placement of the transmission lines in the event the project is approved. Additional information is needed regarding what amount and type of activities may be authorized within any approved corridor and for how long the corridor designation will last.
- Communities along the urbanized portions of the proposed routes have expressed concerns about electric and magnetic field (EMF) and radiofrequency exposure, audible noise, transmission line signal interference with radio and television communications and aesthetics. Please provide additional information about these issues as well as how potential impacts will be mitigated.
- The map series showing the transmission corridor locations do not differentiate between existing rights-of-way/easements and areas proposed. Please provide revised figures showing areas where additional rights-of-way/easements are required.
- Please provide mapping of existing and proposed greenways. The Application does not address the Parks and Open Spaces.
- The application states that new rights-of-way will need to be obtained for the east transmission line corridor. Please provide details on where new rights of way will be obtained.
- Information on the potential degradation of health, safety, tranquility, character, and overall welfare of residential neighborhood conditions with respect to transmission line corridors has not been provided. Information should include recent academic studies regarding EMFs and high electrical transmissions.

- The APPLICATION fails to adequately address the public health and welfare of the nearby residents and city public safety officials. It does not adequately address the impact of the noise levels on the nearby single family residences.
- FPL has not provided locations of existing underground facilities such as Flagami to Miami substations and Coconut Grove to Miami substations. In addition, FPL has not provided a cost estimate for paralleling existing underground facilities from Flagami to Miami substations to enable the CITY to determine the feasibility issues of this scenario.

The CITY respectfully recommends that FPL's Siting Certification Application is incomplete for the reasons set forth above and is unable to properly evaluate the impact the proposed transmission line corridor will have upon the CITY and therefore, readily prepare for such corridor. Moreover, the CITY requests that FPL provide additional information and materials to the concerns addressed herein.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Mendez", written over a horizontal line.

Victoria Mendez
Assistant City Attorney

cc: Distribution List-via email only