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October 13, 2011

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

OCT 13 2011

SITING COORDINATION

Cindy Mulkey, Administrator
Siting Coordination Office
Florida Department of Environmental Protection
2600 Blainstone Road, MS 48
Tallahassee, FL 32399

RE: Site Certification Application, FWC Preliminary Statement of Issues, Florida
Power and Light Turkey Point Nuclear Power Plant New Units 6 & 7 Plant Site
Portion, Miami-Dade County, Florida

Dear Ms. Mulkey:

The Division of Habitat and Species Conservation, Conservation Planning Services section, of the Florida Fish and Wildlife Conservation Commission (FWC) has coordinated our agency's review of the Turkey Point Nuclear Power Plant application. Pursuant to Florida Statutes 403.5066, this letter serves to identify the FWC's Preliminary Statement of Issues regarding the Plant site portion of the application. More specific information will be contained in our Agency Report. Please note that FWC staff is continuing to work with Florida Power and Light to address these issues as part of developing recommended Conditions of Certification.

Project Description

Florida Power and Light Company (FPL) proposes to build and operate two new nuclear generating units (Units 6 & 7), each with an approximate electrical output of 1,100 megawatts, and supporting buildings, facilities, and equipment at a site within the existing Turkey Point plant property boundaries. Associated facilities include a nuclear administration building, training building, and parking area; an FPL reclaimed water treatment facility and reclaimed water pipelines; radial collector wells and delivery pipelines; equipment barge unloading area; access roads and bridges; and potable water pipelines. The site is located south of Units 3 and 4 and occupies approximately 300 acres within the existing industrial wastewater facility.

Preliminary Issues

FWC has met with FPL on multiple occasions throughout the review of the project. The Turkey Point Nuclear Power Plant site portion will likely impact federally and state-listed species, as described in the application on Tables R9.3.7-1 and P9.3.7-1. Most recently, FWC met with FPL on October 11, 2011 to discuss the preliminary issues listed below, which we will continue to work towards resolving with FPL:

- Benthic species and habitats (seagrasses, hardbottom, reefs and associated reef resources), plankton, mangroves, and protected species (both federally and state-listed);

- Habitat types (including seagrasses, mangroves, and hardbottoms) located within Biscayne Bay near the project area;
- Baseline survey and monitoring information for the radial collector wells, caissons, and lateral arms, with preferably a minimum of two years of data immediately preceding construction and operation. This data should include sampling prior to, during, and at least one month after all radial collector well events. We are looking for FPL to identify and commit to modeling environmental responses such as water quality and seagrass- and hard bottom-dependent species;
- Potential impacts of radial collector wells on the ecosystem health of Biscayne Bay, including negative impacts of water resource development on salinity of the Bay and its associated coastal wetlands as it relates to fish and wildlife resources;
- Commitment to close monitoring of the effects of radial collector well technology on the Bay post-construction;
- Commitment to provide a contingency plan to be included in the Conditions-of-Certification, should monitoring indicate that this technology is counter-productive to the recovery of Biscayne Bay;
- Wildlife usage of laydown areas, such as terns nesting on temporary laydown sites;
- Least tern nesting habitat is present onsite and there is the potential for additional nesting habitat to be created unintentionally throughout the development timeframe;
- Wildlife usage and movement along associated roadways used for both construction traffic and permanent employee access traffic; usage of culverts that accommodate upland species; and,
- Panther habitat mitigation for loss of habitat in the roadway areas as well as considerations for panther movement across the roadways.

We understand that FPL is coordinating with other review agencies and will continue to coordinate with FWC to develop conditions of certification to address these preliminary issues. We do not believe that these issues are irresolvable and will continue to work with FPL to develop agreeable conditions of certification for this project.

We appreciate the opportunity to review this project and we will continue to coordinate with DEP and FPL throughout the certification process. If you or your staff would like to discuss our review at this step in the process, please contact my office at FWCConservationPlanningServices@MyFWC.com or me personally at phone 850-413-6966 and I will be glad to make the necessary arrangements. If your staff or the applicant

has any specific questions regarding our comments, I encourage them to contact Jennifer Goff at 561-625-5122 or by email at jennifer.goff@MyFWC.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joseph Walsh".

Joseph Walsh, Ph.D.
Assistant Section Leader
Conservation Planning Services

jw/jdg

FPL Turkey Point Nuclear Units 6 and 7_2940_101311
ENV 1-3-2

cc: Jena Mier, FPL, Jena.Mier@fpl.com

