



Environmental Consulting & Technology, Inc.

January 19, 2010
090618-0100-1200

Michael P. Halpin, P.E.
Administrator
Florida Department of Environmental Protection
Siting Coordination Office
Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Re: SECI Hardee Power Station (PA 89-25)
Amendment Request for Conductor Replacement
Vandolah – Charlotte Transmission Lines
Request for Additional Information

Dear Mr. Halpin:

On November 12, 2009, the Siting Coordination Office received a request from Hopping, Green & Sams, the law firm representing Seminole Electric Cooperative Inc. (SECI) for an amendment to SECI's Hardee Power Station's Site Certification. The amendment request is to replace the conductor on a portion of an associated transmission line south of the certified plant site extending from the existing Vandolah Substation to the existing Florida Power & Light Company-Charlotte Substation. On December 21, 2009, the Siting Coordination Office indicated that additional information is needed for it to make a determination as to whether these requests are approvable via an amendment, or whether a modification to the Site Certification will be necessary. Responses to individual requests for additional information are provided below.

The Southwest District of the Department of Environmental Protection (DEP-SWD) requested that the following information be provided:

DEP-SWD Comment No. 1. The applicant has applied for a NGP under 62-341.620, Florida Administrative Code (F.A.C.). However, that rule states that the proposed construction and clearing shall be conducted in a manner that does not adversely affect threatened or endangered species. The application states that a Caracara nest is on pole 178 that is proposed for removal. Please explain how this condition of the NGP will be met.

SECI Response 1: The referenced Caracara nest is not located on pole 178; rather, the nest is located within a cabbage palm approximately 50 feet west of pole 178. Construction and clearing will not affect this threatened species because the tree with the nest will not be removed and construction in this area is

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planned to take place outside of Caracara nesting season. SECI has contacted and will continue to work with the U.S. Fish and Wildlife Service and the Florida Fish and Wildlife Conservation Commission to make sure proper guidelines are being followed. Please see pages 4-5 of Appendix C to the Application submitted on November 23, 2009, for additional information.

DEP-SWD Comment No 2. The applicant has also applied under 62-341.439, F.A.C. However, that rule applies only to wholly artificial, non-navigable drainage conveyances. Based on aerial photos, it appears that the area proposed for the new culvert is, or was, a natural non-navigable water conveyance. Please provide more information on history and current state of the area that is proposed for a new culvert installation and explain how this culvert installation will qualify for the NGP.

SECI Response 2: After discussion with DEP staff on January 11, 2010, SECI understands that only the drainage crossing located between structures 301 and 302 in Charlotte County (Figure 28, Plan View-Sheet 25 of 28 in the Application) meets the requirements of the referenced NGP (62-341.439, F.A.C.). Therefore, SECI requests that DEP-SWD proceed with review of the three most northern drainage crossings under the standard general permit criteria. Because the culvert installations will have only minimal or insignificant individual and cumulative adverse impacts on the water resources of the district (a listing of dredge and fill impacts by culvert location is provided below), however, SECI also requests that DEP-SWD determine whether the proposed activities qualify for exemption pursuant to Section 373.406(6), Florida Statutes.

As requested, photographs of each drainage crossing are included with this submittal to assist in review of potential drainage impacts. These photographs illustrate the existing, highly disturbed nature of the surface water crossings.

Dredge and fill impacts by culvert location in the three most northern drainage crossings:

<u>Culvert ID</u>	<u>Fill (AC)</u>	<u>Dredge (CY)</u>
79-80	0.02	59
104-105	0.01	91
213-214	<u>0.02</u>	<u>81</u>
TOTAL	0.05	231

DEP-SWD Comment No 3. Provide a list of the poles that are proposed to be installed in wetlands. Also, provide a list of poles that are not proposed to be installed in wetlands but are going to be within 30 feet of wetlands. Please be advised that the Department may request a site inspection to verify the wetland lines on the plans.

SECI Response 3: A spreadsheet containing a list of proposed poles in wetlands, as well as poles within thirty feet of wetlands, is attached.

DEP-SWD Comment No 4. Provide cross-sectional view drawings for pole numbers 134 and 211.

SECI Response 4: Cross-sectional view drawings have not been provided for pole numbers 134 and 211 because these poles are not located in wetlands. These areas were inspected in the field and found not to be wetlands, notwithstanding that they may have been wetlands years ago when the National Wetland Inventory (NWI) maps were drawn from aerial photography. Such findings are not uncommon. The October and November 2009 field surveys revealed that many areas within the corridor study area shown on NWI maps as wetlands are no longer wetlands due to either filling for the original construction (permitted under the SCA process) or other reasons (drainage for agriculture, etc.)

The NWI maps were utilized for initial engineering planning to avoid and/or minimize wetland impacts when locating new pole locations or accessing any poles. They were illustrated on the Application figures as a historical resource only. Existing, actual wetland areas delineated during the project-specific field surveys are identified on the figures as red hatched areas. To clarify, Figures 4 through 31 from the Application have been modified to show only actual wetlands delineated and are attached.

DEP-SWD Comment No 5. Show the locations of the three culverts that will be replaced on the plan view sheets 1 through 28.

SECI Response 5: The locations of the three culverts to be replaced are shown on plan view sheets 1 (Figure 4), 4 (Figure 7), and 14 (Figure 17) of the Application.

DEP-SWD Comment No 6. The applicant has applied under 62-341.439, F.A.C. However, that rule states "In no instance shall the culverts provide a smaller cross-sectional area or discharge capacity than any upstream culvert."

SECI Response 6: Please see SECI Response 2, above.

DEP-SWD Comment No 6a. *The proposed 36-inch culverts between structures 104 and 105 have a combined 14.7 SF cross section and are smaller than the upstream 50 SF box culvert.*

SECI Response 6a: The box culvert upstream of this crossing conveys water under County Road 663. This culvert is sized to provide a safe and passable roadway during large storm events. The box culvert has a downstream invert elevation of 70.3 feet and a roadway elevation of approximately 78.7 feet. The intent of the proposed drainage crossing is to provide a stable and passable access to construct and maintain the utility structures. As typical with utility easements, it is anticipated that this crossing will be inundated during larger storm events. The existing channel would not support culverts of an equivalent cross sectional area without widening the existing stream crossing. The existing stream has an approximate bottom elevation of 69.3 feet and a top of bank elevation of approximately 74 feet. The elevation surrounding the stream is quite flat with the ground elevation varying from 73.5 to 74.5 feet. Based on the elevation of the surrounding floodplain and the roadway elevation associated with the upstream box culvert, the proposed 36-inch culverts will not create any upstream water level impacts.

DEP-SWD Comment No 6b. *The proposed 24-inch culverts between structures 213 and 214 have a combined 9.4 SF cross section and are smaller than the upstream 60-inch pipes with a combined 39.3 SF cross section.*

SECI Response 6b: Similar to the previous response to 6a, the 60-inch culverts upstream of this crossing conveys water under Lincoln Road. These culverts were sized to provide a safe and passable roadway during large storm events. The 60-inch culverts have a downstream invert elevation of 21.21 feet and a roadway elevation of approximately 26.5 feet. The intent of the proposed drainage crossing is to provide a stable and passable access to construct and maintain the utility structures. As typical with utility easements, it is anticipated that this crossing will be inundated during larger storm events. The existing channel would not support culverts of an equivalent cross sectional area without widening the existing stream crossing. The existing stream has an approximate bottom elevation of 17.9 feet and a top of bank elevation of approximately 20 feet. The elevation surrounding the stream is quite flat with the ground elevation varying from 20 to 21.5 feet. Based on the elevation of the surrounding floodplain and the roadway elevation associated with the upstream box culvert, the proposed 24-inch culverts will not create any upstream water level impacts.

DEP-SWD Comment No 7. *The Department has read the explanation for using undersized downstream culverts. However, the NGP is specific, and in order to qualify for the NGP, all of the conditions must be met. If the applicant chooses not*

to size the culverts correctly then, DEP may require all of the information necessary for processing a Standard General Permit (i.e., flood plain compensation information and mitigation).

SECI Response 7: Please see SECI Response 2, above.

The South District of the Department of Environmental Protection (DEP-SD) requested the following:

DEP-SD Comment No 1. Information on the staging areas for construction to ensure that impacts to wetlands from staging areas and associated activities are minimized to the greatest extent practicable. This information should include a narrative description about the staging activities along with scaled and dimensioned plan view and cross sectional view drawings as applicable. This information should also address items such as:

SECI Response 1: The portion of the proposed project in Charlotte County will not require the use of staging areas within Charlotte County.

DEP-SD Comment No 1a. Equipment to be used;

SECI Response 1a: Section B, Item 4 of the Application describes the construction methods and equipment to be used. No equipment will be used outside of the existing right-of-way in Charlotte County.

DEP-SD Comment No 1b. Areas used during construction activities:

SECI Response 1b: All construction activities will take place within the existing right-of-way.

DEP-SD Comment No 1c. If needed, a plan view drawing indicating the construction and stockpiling areas;

SECI Response 1c: Please see SECI Response 1 and 1b, above.

DEP-SD Comment No 1d. A statement indicating whether the construction and staging areas will be temporary or permanent in nature;

SECI Response 1d: No permanent or temporary use of areas outside of the existing right-of-way is needed for construction activities. Please also see SECI Response 1, above.

DEP-SD Comment No 1e. If the areas to be used for construction are to be temporary, clarification of how long the area is to be impacted, at what time of the year it is to be impacted and details on how this area will be restored;

SECI Response 1e: Please see SECI Response 1, 1a, and 1d, above. The current schedule calls for all construction to be completed in Charlotte County by the middle of 2011. The first 8-mile segment will start at the Charlotte County substation and progress north to structure 308. Clean-up of the existing right-of-way will be completed by June 30, 2010. The remaining structures in Charlotte County will be constructed from March 1, 2011 and will be completed by June 30, 2011.

DEP-SD Comment No 1f. If rutting of the soils, due to heavy equipment, is expected in the construction areas, a detailed description of the restoration activities; and

SECI Response 1f: If any rutting occurs, the contractor will restore the areas to their original condition, including grassing.

DEP-SD Comment No 1g. Erosion/turbidity barriers (staked filter cloth, silt screens, hay bales, etc.) and other wetland protection measures, if any, to be employed to prevent impacts to the proposed project site and any adjacent wetlands.

SECI Response 1g: Section B, Item 4 of the Application describes proposed sediment control methods. Appropriate temporary matting will be used to cross wetlands where needed. Staked silt fences with hay bales along uplands will be used. Silt screens will be placed down gradient of construction areas, as required. Please also see the erosion control details (details for silt fences and floating turbidity barriers) included as figures in the Application.

DEP-SD Comment No 2. DEP- SD staff recommends that the applicant demonstrate that the portion of the proposed project in Charlotte County meet the criteria in Rule 62-341.475, F.A.C. This may include providing additional narrative description about the proposed project along with scaled and dimensioned plan view and cross sectional view drawings as applicable.

SECI Response 2: SECI has not attempted to demonstrate compliance with the criteria in Rule 62-341.475, F.A.C., because SECI is proposing to dredge or fill more than 100 sq. ft of wetlands or other surface waters. See Rule 62-341.475(1)(c), F.A.C. In Charlotte County, the following wetland impacts are anticipated due to pole placement: 235.5 sq. ft. of fill, 197.2 cu. Yd of dredging. Impacts to surface waters will only occur at one location where a culvert is proposed to be placed in an intermittent, wholly artificial, non-navigable conveyance. Culvert construction will result in 62.0 sq. yd. (=558 sq. ft.) of fill and 31.0 cu. yd. of dredging.

The pole placement portion of the project qualifies for an NGP under Rule 62-341.620; the culvert placement qualifies for an NGP under Rule 62-341.439. Section B, item 5 of the Application is a checklist for these general permits that demonstrates that the project meets the criteria of the rules.

***DEP-SD Comment No 3.** Additionally, the proposed project includes the installation of a culvert in an artificial waterway to facilitate the installation of a vehicle crossing over the affected artificial waterway. DEP-SD staff recommends that the applicant demonstrate that the proposed culvert installation in the portion of the project in Charlotte County meets the criteria in Rule 62-341.439, F.A.C. This may include providing additional narrative description about the proposed project along with scaled and dimensioned plan view and cross sectional view drawings as applicable.*

SECI Response 3: Section B, Item 5 of the Application presents a checklist demonstrating that the proposed culvert installation meets the criteria in Rule 62-341.439, F.A.C. Please also see the November 2009 Culvert Design Report, included as Appendix D to the Application, and construction drawings sheets C1 through C5, included as figures in the Application.

***DEP-SD Comment No 4.** DEP- SD staff recommends that the applicant schedule an inspection with our office staff to determine and evaluate the wetland resources expected to be impacted by the 16 poles to be located in wetlands, and whether project modifications or mitigation for unavoidable impacts to wetlands is appropriate. The DEP-SD staff contact for the inspection is Arielle Poulos who can be reached by phone at 239-332-6975, ext. 184 or by e-mail at Arielle.Poulos@dep.state.fl.us.*

SECI Response 4: DEP-SD was contacted and the recommended meeting with Arielle Poulos took place on Tuesday, January 5, 2010. At that time, SECI requested that portions of the disked fence line along CR 74 (Bermont Road) be used for access in place of mats in wetland areas.

***DEP-SD Comment No 5.** DEP- SD staff recommend that the applicant document whether: (1) any authorization from the Board of Trustees of the Internal Improvement Trust Fund (Board of Trustees), or the Department as staff to the Board of Trustees, is required for any of the existing crossings of waterbodies in Charlotte County that may be sovereignty submerged lands. These waterbodies appear to include Shell Creek and Prairie Creek; and (2) whether any authorization to use sovereignty submerged lands has been issued for the existing power line crossings. The Siting Coordination Office of DEP requests that a letter of consent be submitted pursuant to Rule 18-21.005(1)(c)(14) in order to make any*

easements on sovereign submerged lands comply with current rules. Attached are two templates regarding the Letter of Consent.

SECI Response 5: The existing Vandolah-Charlotte transmission line crosses three named waterbodies in Charlotte County: Prairie Creek, Shell Creek, and Myrtle Slough. These waterbodies may be “sovereignty submerged lands” as that term is defined in Rule 18-21.003(61), Florida Administrative Code (2009).

SECI has constructed, operated, and maintained the existing Vandolah-Charlotte transmission line in accordance with the November 27, 1990 Final Order of the Governor and Cabinet (and associated Conditions of Certification), which certified the Hardee Power Station and associated transmission lines pursuant to the Florida Electrical Power Plant Siting Act. The Board of Trustees of the Internal Improvement Trust Fund participated as a party to that certification proceeding, and the Final Order resolved issues relating to the crossing of any sovereignty submerged lands by the Vandolah-Charlotte transmission line. Final Order of the Siting Board on Application No. PA 89-25, Exhibit A, ¶ 2 (Nov. 27, 1990); see also § 403.509(3), Fla. Stat. (1989) (“In regard to the properties and works of any agency which is a party to the certification hearing, the [Governor and Cabinet sitting as the Siting Board] shall have the authority to decide issues relating to the use, the connection thereto, or the crossing thereof, for the electrical power plant and site . . .”).

If DEP approves SECI’s requested post-certification amendment to the Site Certification Application for the existing power plant and associated facilities, any crossing of sovereignty submerged lands by the reconducted Vandolah-Charlotte transmission line will be consistent with the existing authorization to cross sovereignty submerged lands by the same because the reconducted transmission line will be located entirely within the existing transmission right-of-way and will not require the installation of any support structures on sovereignty submerged lands. Thus, SECI is not seeking from the Board of Trustees (or the Department) new approval for crossings of sovereignty submerged lands by the reconducted Vandolah-Charlotte transmission line. As requested by the Office of Siting Coordination, SECI will seek from the Department, however, a Letter of Consent pursuant to Rule 18-21.005(1)(c)(14) or Rule 18-21.005(1)(c)(4), so that the existing authorization for such crossings can be brought into conformance with current rules regarding sovereignty submerged lands. To facilitate review, information necessary for a Letter of Consent determination is being provided. Items (1)-(4) in Rule 18-21, F.A.C. is presented in Sections A and B of the Application. Items (5) and (7) are not applicable. Drawings providing the information required to satisfy item (6) are attached.

Mr. Michael P. Halpin P.E.
January 19, 2010
Page 9

Section G for the Application has been completed and attached to provide additional information to support the request for a Letter of Consent determination. It is requested that Section G be appended to the Application submitted on November 23, 2009.

If you have any further questions, please feel free to contact me.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.



James Poppleton
Principal Scientist

JP/baj

Enclosures

cc: Greg Nieboer, FDEP SW District
Mark Miller, FDEP South District
Ann Seiler, FDEP Tallahassee
Brian Accardo, Esq., Hopping Green & Sams, P.A.
Robert Yarbrough, Seminole Electric Cooperative, Inc.
Michael Lee, ECT

**SECI RESPONSE 2 TO
DEP-SWD COMMENT NO. 2**

**LOCATION MAPS AND PHOTOS
OF EACH DRAINAGE CROSSING**



Drainage Crossings Location Map



Drainage Crossing between Structures 79 and 80 – Photographs.



Looking south at the existing 30-inch culvert.



**Looking Southeast at the downstream end of the existing culvert to be replaced.
Note eroded banks.**



Looking east at the upstream end of the existing culvert.



Drainage Crossing between Structures 104 and 105 - Photographs



Looking south at the existing low water crossing showing eroded banks, upland plants growing to bed of drainage.



Looking west at upstream end of low water crossing.



Looking southeast at downstream end of low water crossing showing cattle impacts.



Drainage Crossing between Structures 213 and 214 – Photographs.



Looking north at the existing low water crossing illustrating disturbed nature of proposed crossing area, erosion, and sedimentation.



Looking west at downstream end of low water crossing showing preponderance of the nuisance *Colocasia esculentus* (taro).



Looking east at upstream end of existing low water crossing showing mostly non-vegetated banks with resultant erosion. Note non-native bahia grass on left side of photo and Caesar's weed on lower right portion of the photo.



Drainage Crossing between Structures 301 and 302 – Photographs.



Looking south at existing upland cut, intermittently flowing irrigation ditch.



Looking west at existing upland cut irrigation ditch showing ditch channel vegetated with a variety of wetland, transitional, and upland plants.

**SECI RESPONSE 3 TO
DEP-SWD COMMENT NO. 3**

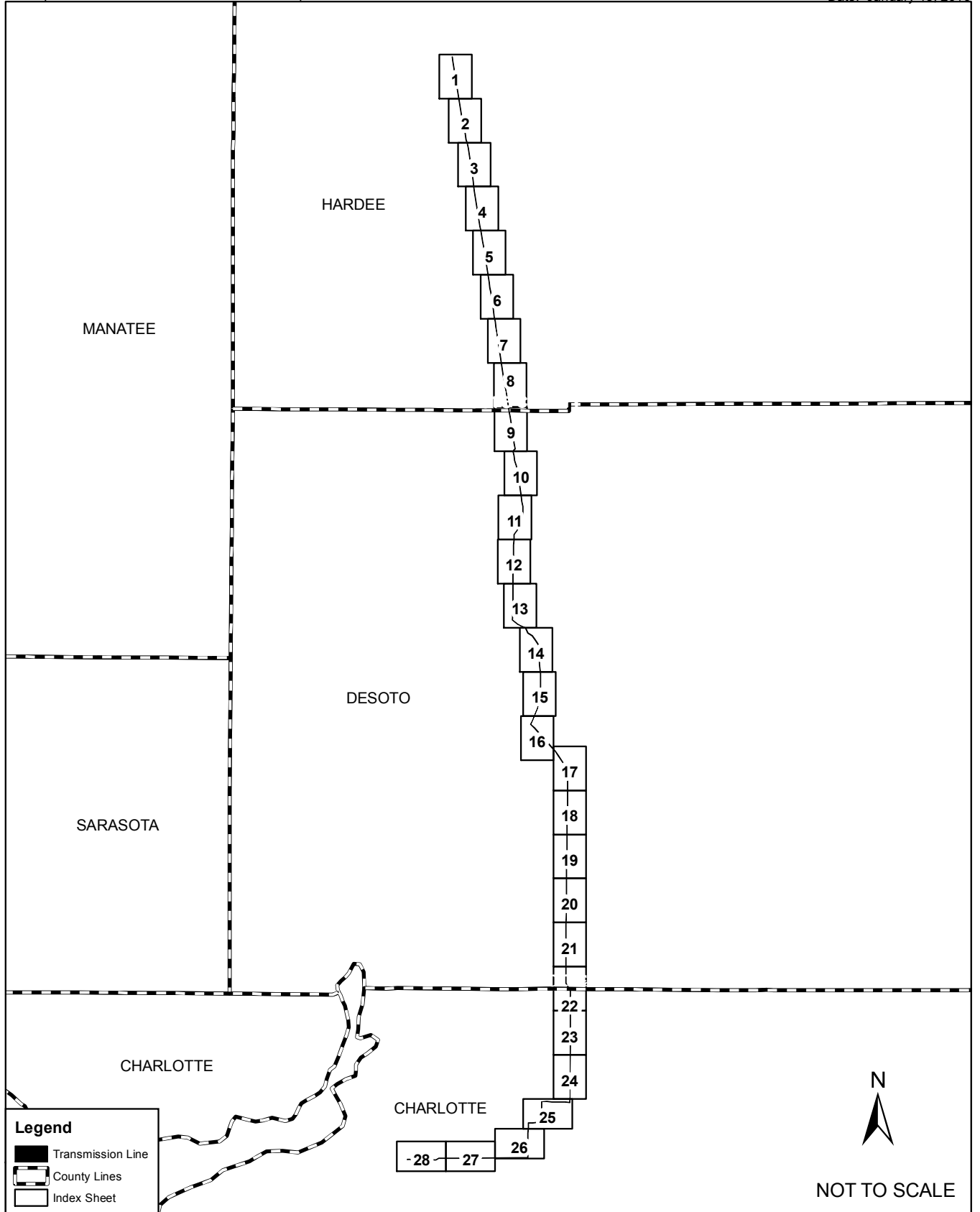
**TABLE SHOWING LIST OF
PROPOSED POLES IN WETLANDS
AS WELL AS POLES
WITHIN 30 FEET OF WETLANDS**

Seminole Electric Cooperative, Inc. Vandolah to Charlotte 230 kV Reconductor Project
Table Showing Pole Numbers and Coordinates of Those in Wetlands or Within 30 Feet

Poles in wetlands			Poles within 30 feet of wetlands		
Pole No.	x	y	Pole No.	x	y
95	-81.91833400000	27.47724900000	77	-81.92674400000	27.51983000000
111	-81.91132900000	27.43628300000	97	-81.91738200000	27.47188000000
196	-81.89184100000	27.23466700000	129	-81.90290600000	27.38848600000
200	-81.89197700000	27.22754600000	133	-81.90111500000	27.37821300000
201	-81.89058700000	27.22650700000	139	-81.89824700000	27.36136500000
225	-81.87741300000	27.18144000000	148	-81.89422500000	27.33892800000
235	-81.86896100000	27.16079700000	198	-81.89190100000	27.23103900000
242	-81.85988000000	27.14468700000	202	-81.88901200000	27.22546700000
260	-81.86056000000	27.09223900000	209	-81.87892700000	27.21741000000
269	-81.86081000000	27.06566600000	216	-81.87583200000	27.20195500000
289	-81.85846700000	27.01226500000	220	-81.87556400000	27.19225900000
294	-81.85849600000	26.99913000000	222	-81.87560300000	27.18751100000
322	-81.88321200000	26.94631000000	241	-81.85997900000	27.14714300000
323	-81.88633700000	26.94626600000	252	-81.86019100000	27.11556500000
324	-81.88954000000	26.94625500000	253	-81.86023700000	27.11264900000
325	-81.89277700000	26.94624400000	254	-81.86028300000	27.10973300000
326	-81.89613800000	26.94623300000	255	-81.86032900000	27.10681700000
327	-81.89943800000	26.94622200000	256	-81.86037600000	27.10390200000
328	-81.90273700000	26.94621100000	257	-81.86042200000	27.10098600000
329	-81.90603700000	26.94620000000	258	-81.86046900000	27.09807000000
330	-81.90927600000	26.94618900000	259	-81.86051500000	27.09515500000
331	-81.91254500000	26.94617800000	261	-81.86059500000	27.08928200000
332	-81.91574300000	26.94616700000	262	-81.86063000000	27.08632500000
333	-81.91888300000	26.94615600000	263	-81.86066500000	27.08336800000
			264	-81.86070000000	27.08041100000
			265	-81.86073200000	27.07755800000
			270	-81.86083100000	27.06264000000
			271	-81.86084900000	27.05987500000
			272	-81.86086600000	27.05719300000
			273	-81.86088600000	27.05425000000
			274	-81.86090600000	27.05136100000
			287	-81.85845600000	27.01800100000
			306	-81.86941500000	26.97560000000
			321	-81.88318500000	26.94885800000
			334	-81.92231200000	26.94614400000

**SECI RESPONSE 4 TO
DEP-SWD COMMENT NO. 4**

**MODIFICATION TO
FIGURES 4 THROUGH 31**



INDEX MAP FOR AERIAL PHOTOS FOR PROJECT AREA
SEMINOLE ELECTRIC COOPERATIVE, INC.
VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
HARDEE, DESOTO AND CHARLOTTE COUNTIES, FLORIDA

Sources: Prepared by ECT, 2010.



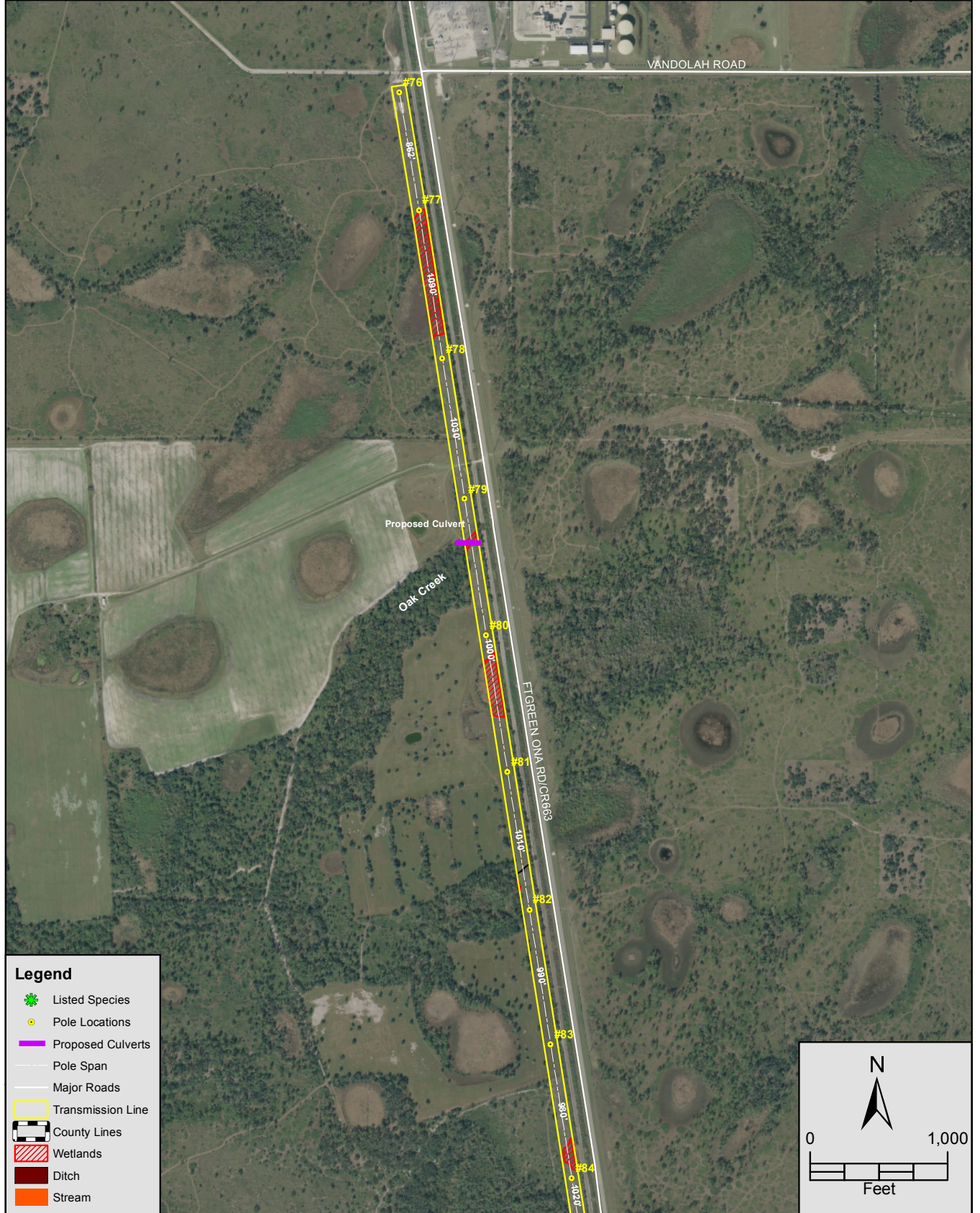


FIGURE 4.
 PLAN VIEW - SHEET 1 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

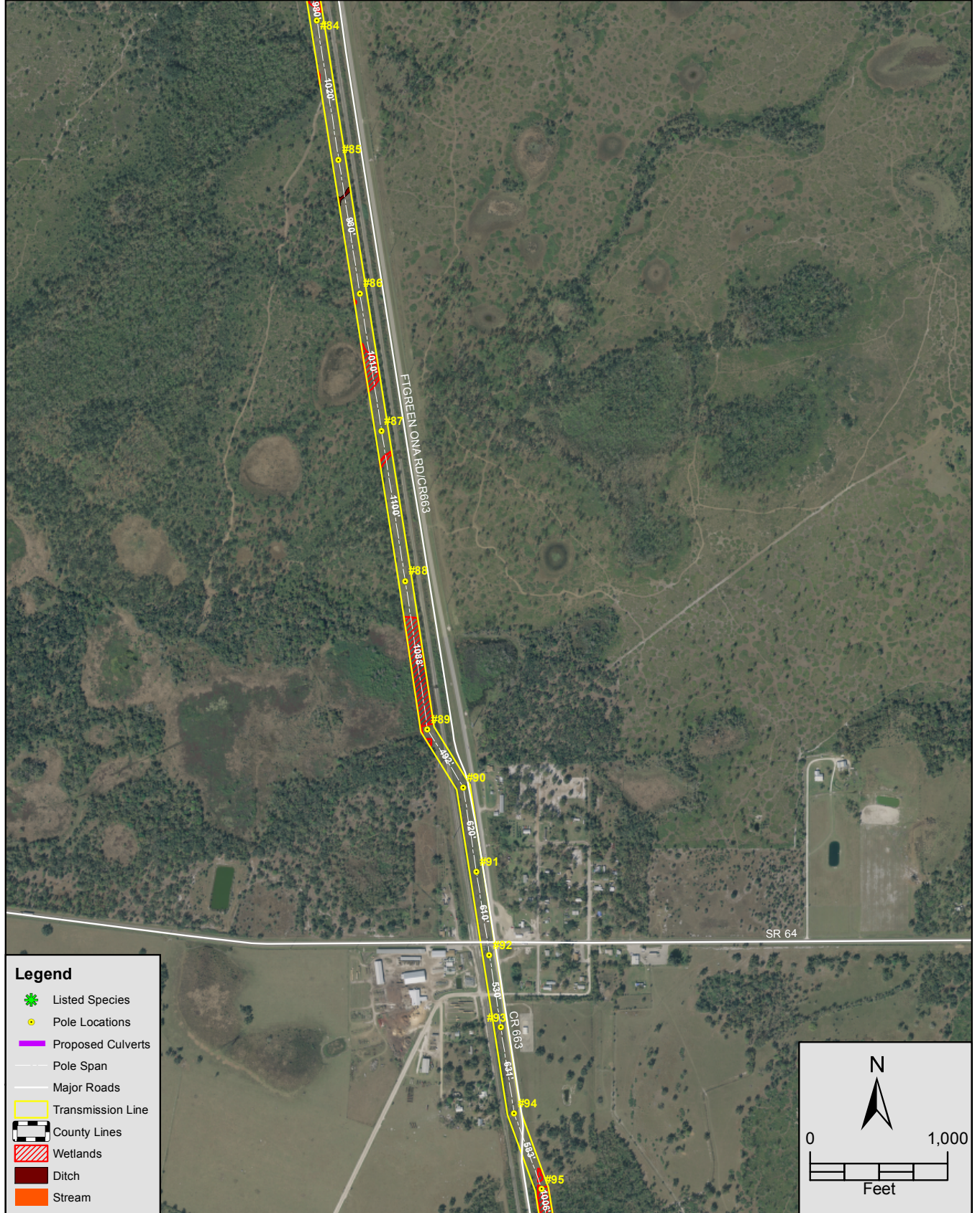


FIGURE 5.
 PLAN VIEW - SHEET 2 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

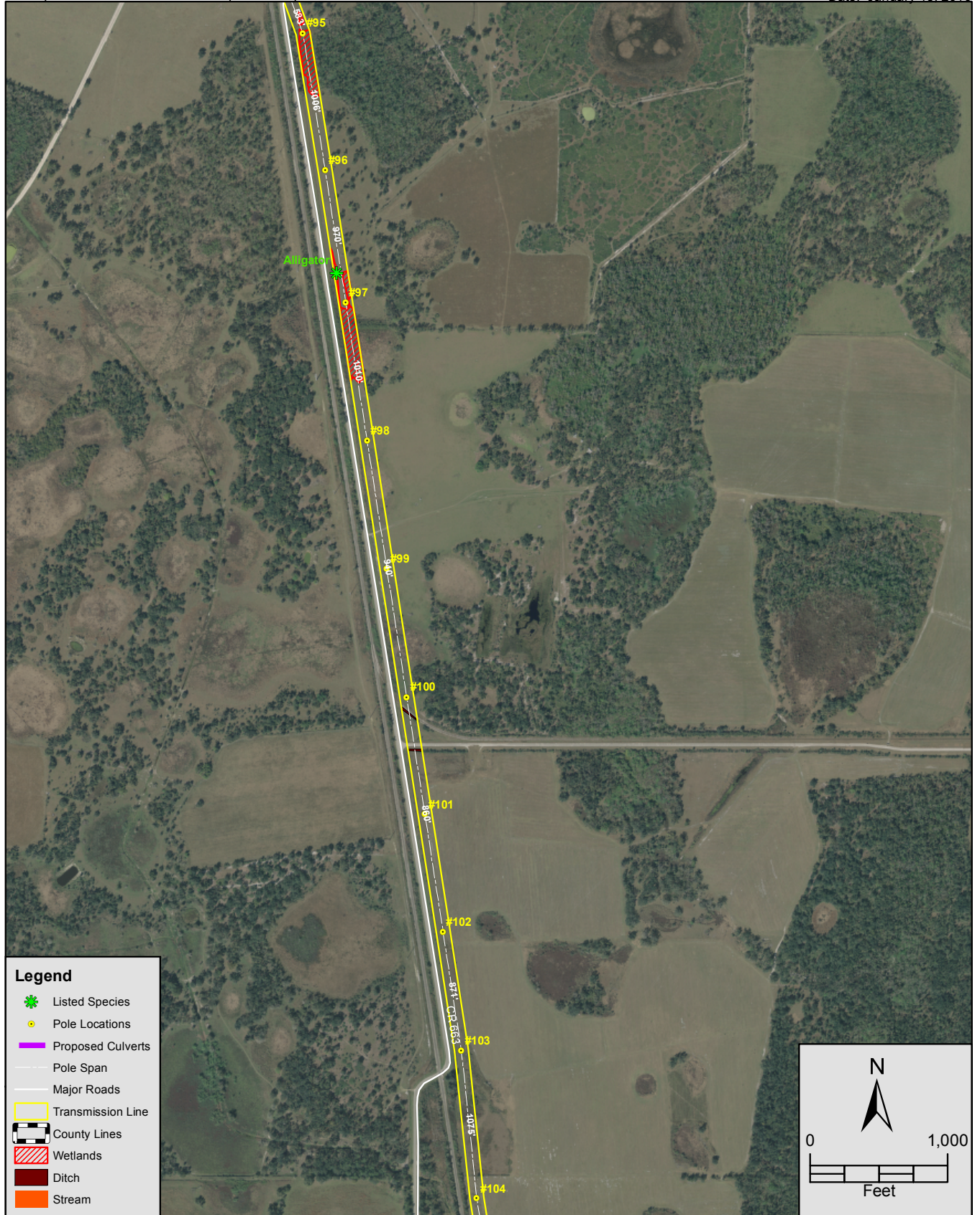


FIGURE 6.
PLAN VIEW - SHEET 3 OF 28
SEMINOLE ELECTRIC COOPERATIVE, INC.
VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

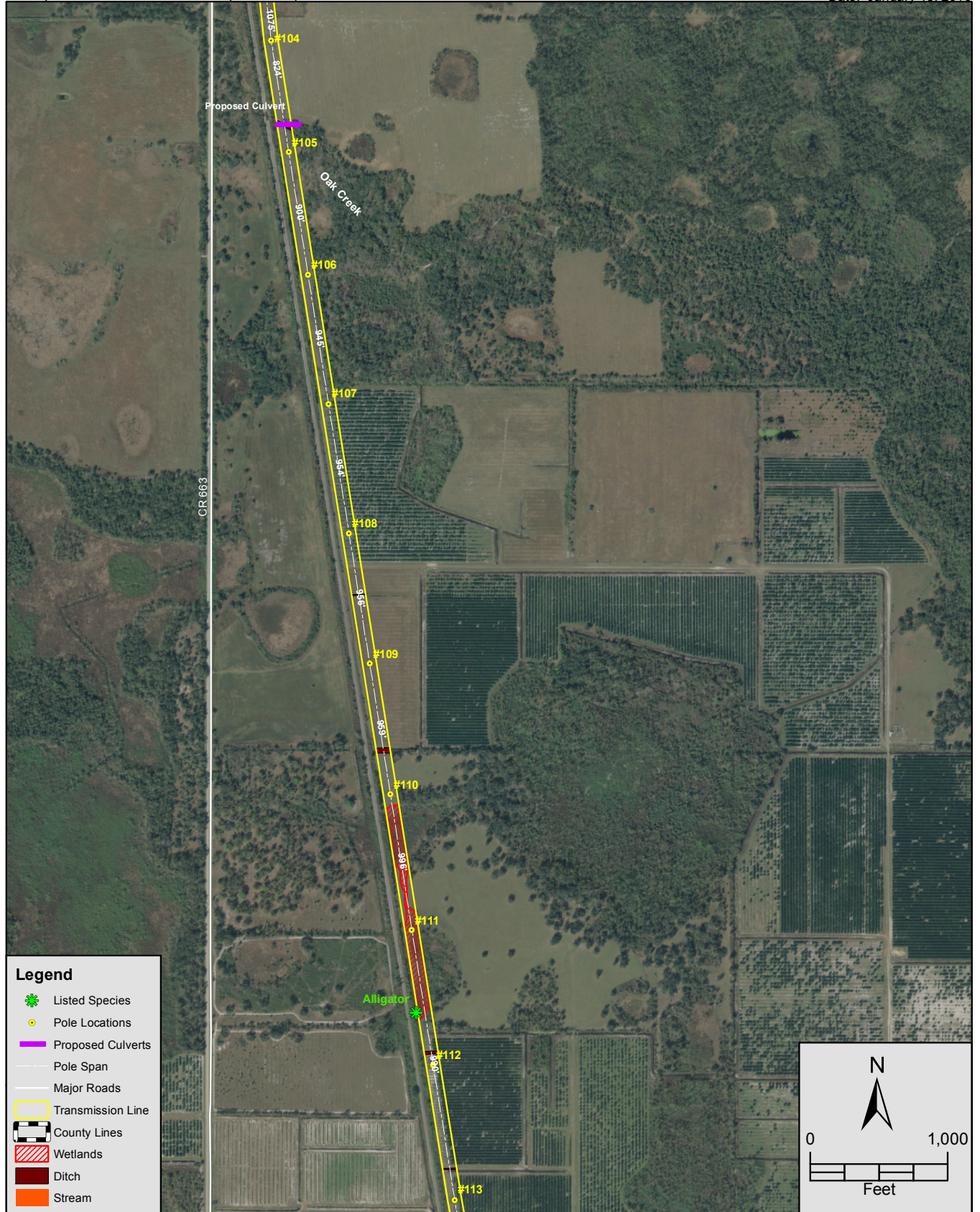


FIGURE 7.
 PLAN VIEW - SHEET 4 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



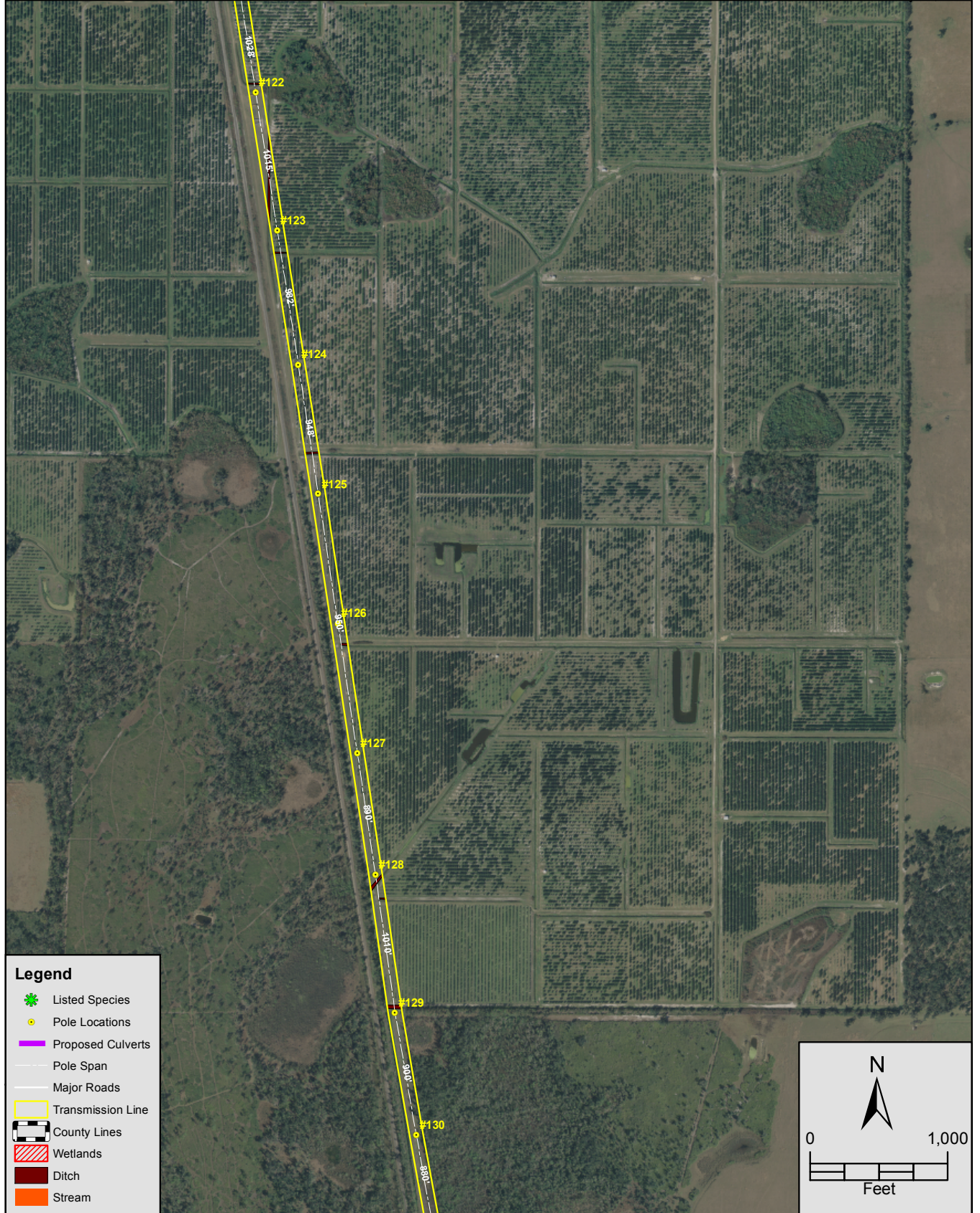


FIGURE 9.
 PLAN VIEW - SHEET 6 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

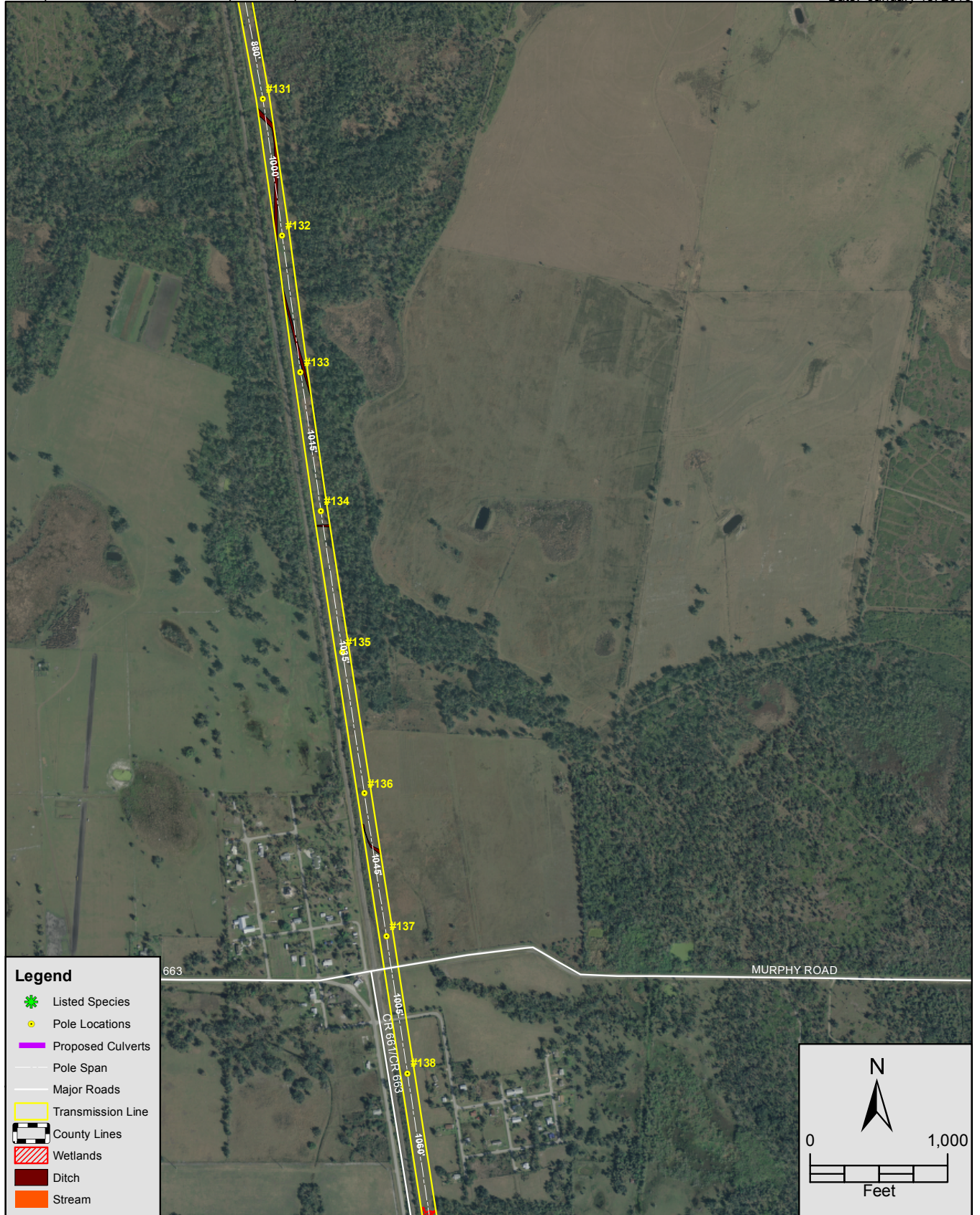
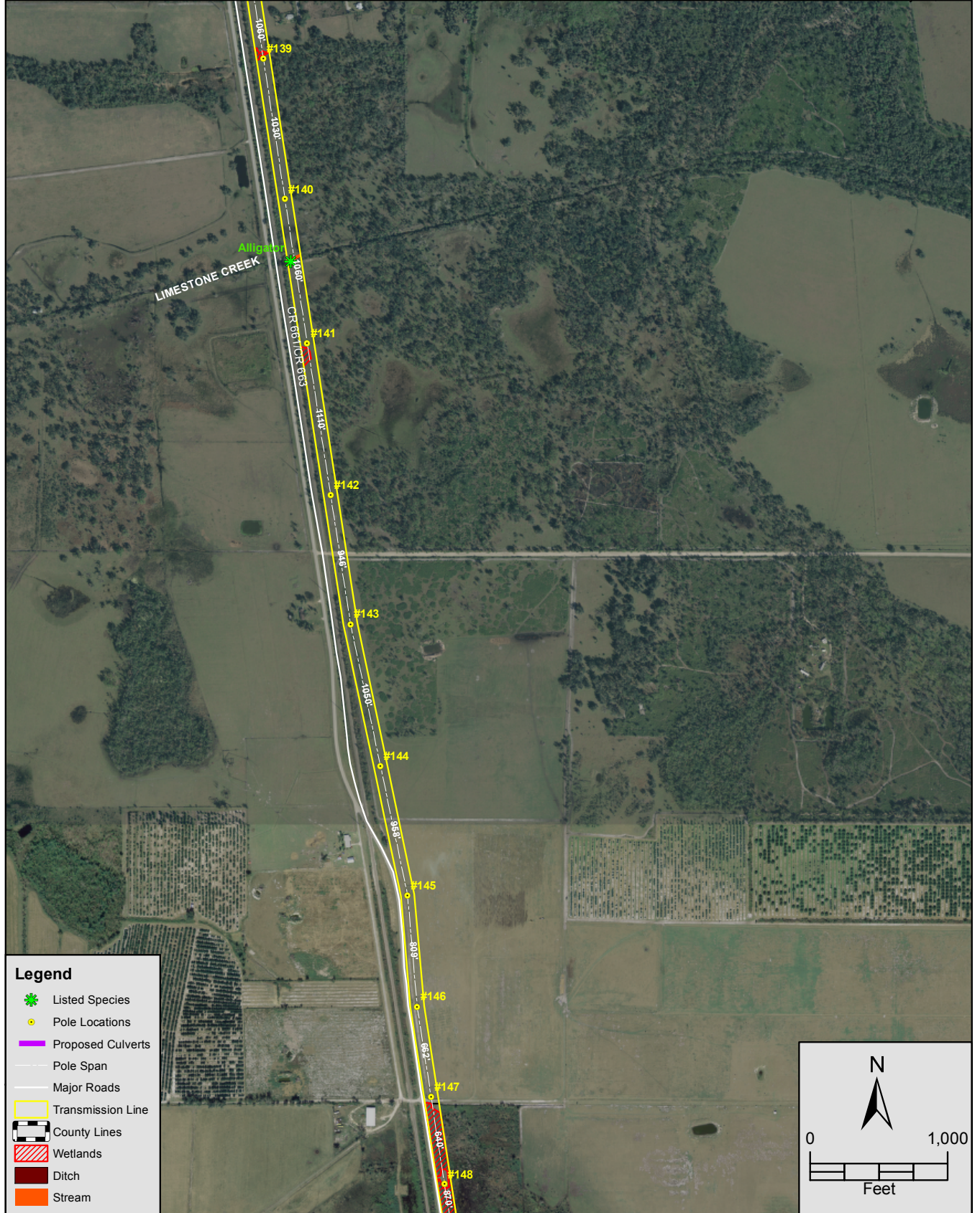
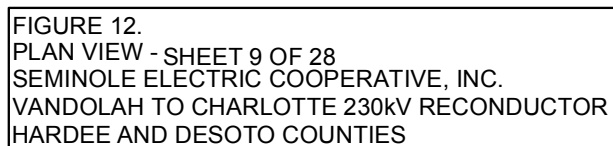


FIGURE 10.
 PLAN VIEW - SHEET 7 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.





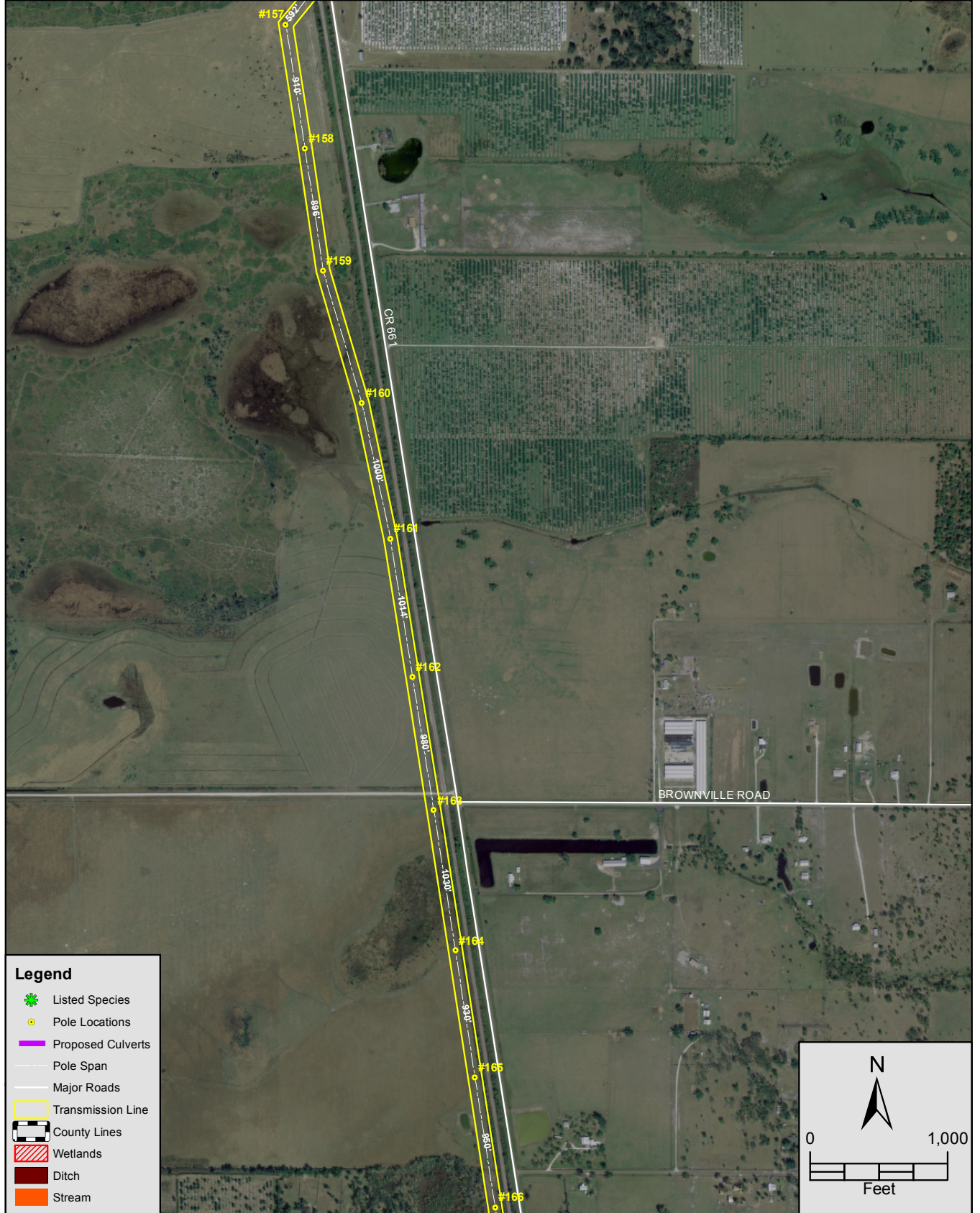


FIGURE 13.
 PLAN VIEW - SHEET 10 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

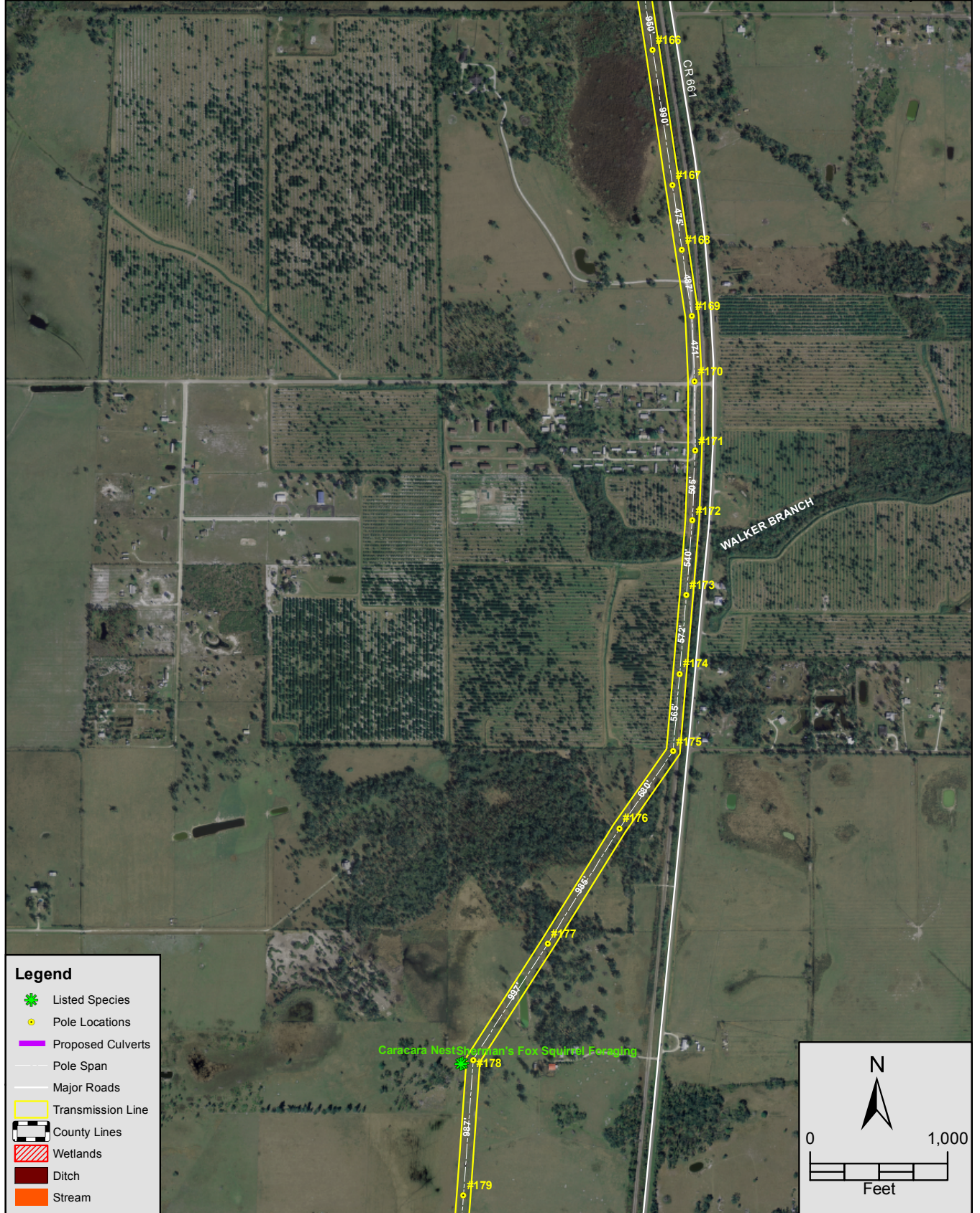


FIGURE 14.
 PLAN VIEW - SHEET 11 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

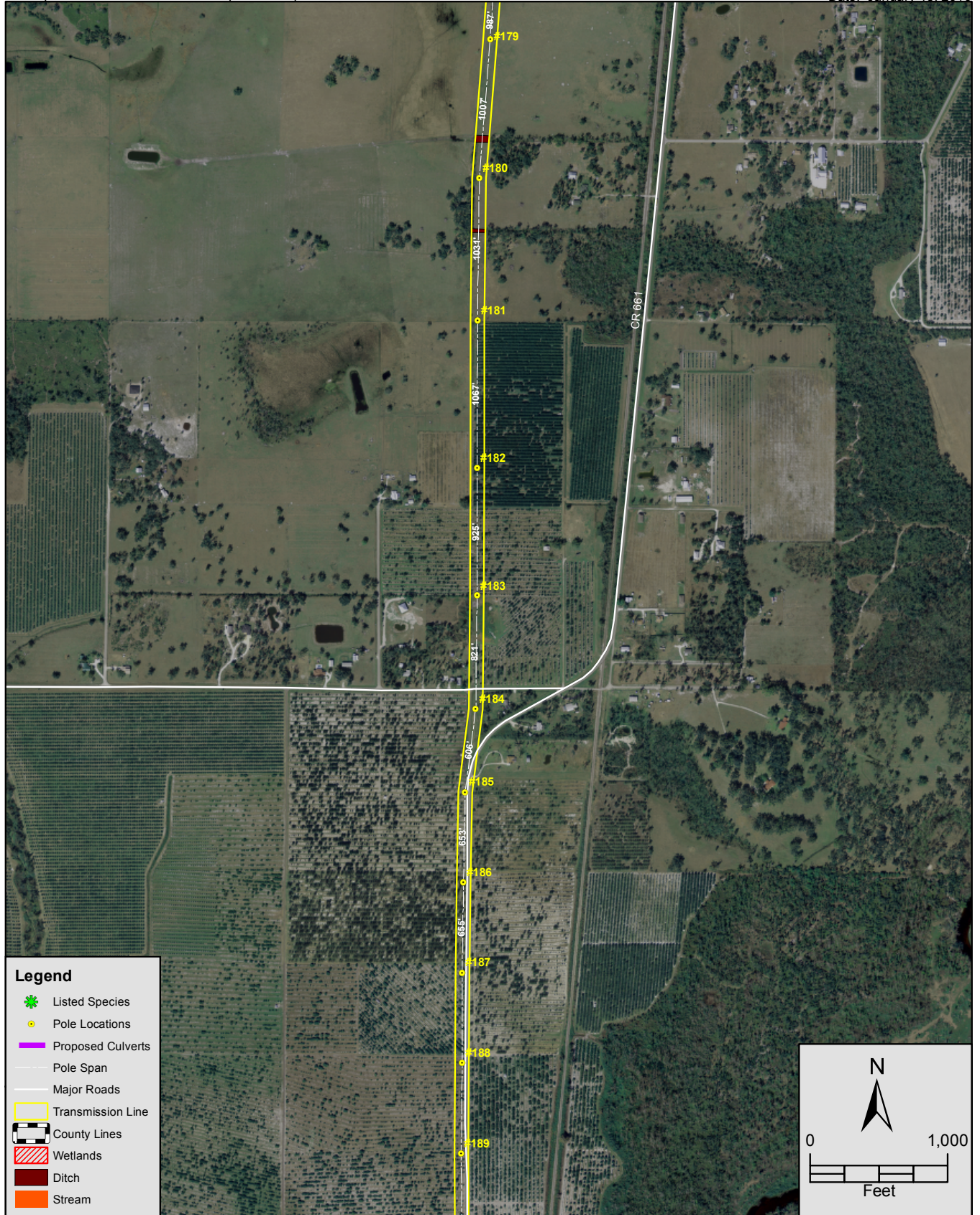


FIGURE 15.
 PLAN VIEW - SHEET 12 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

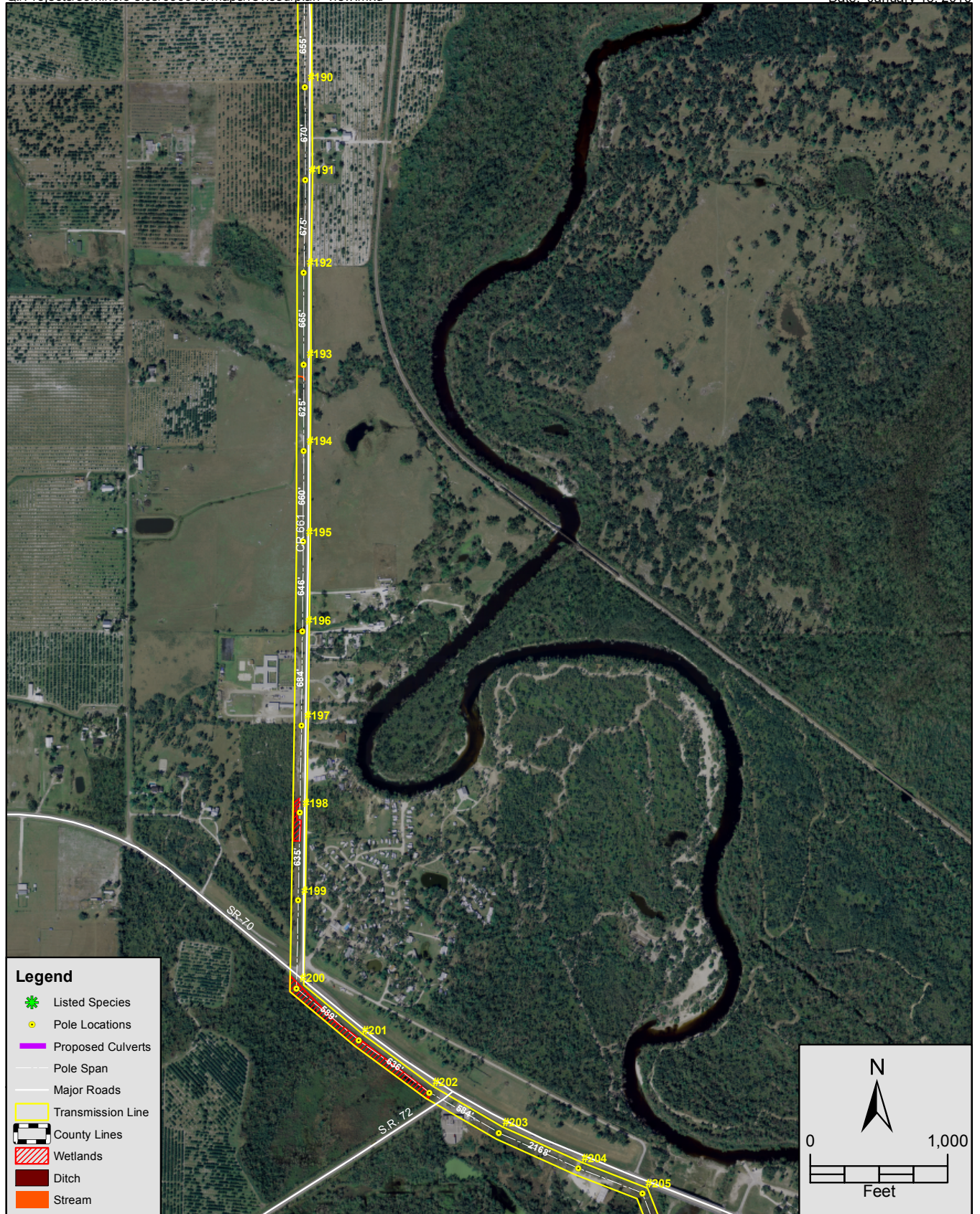


FIGURE 16.
 PLAN VIEW - SHEET 13 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

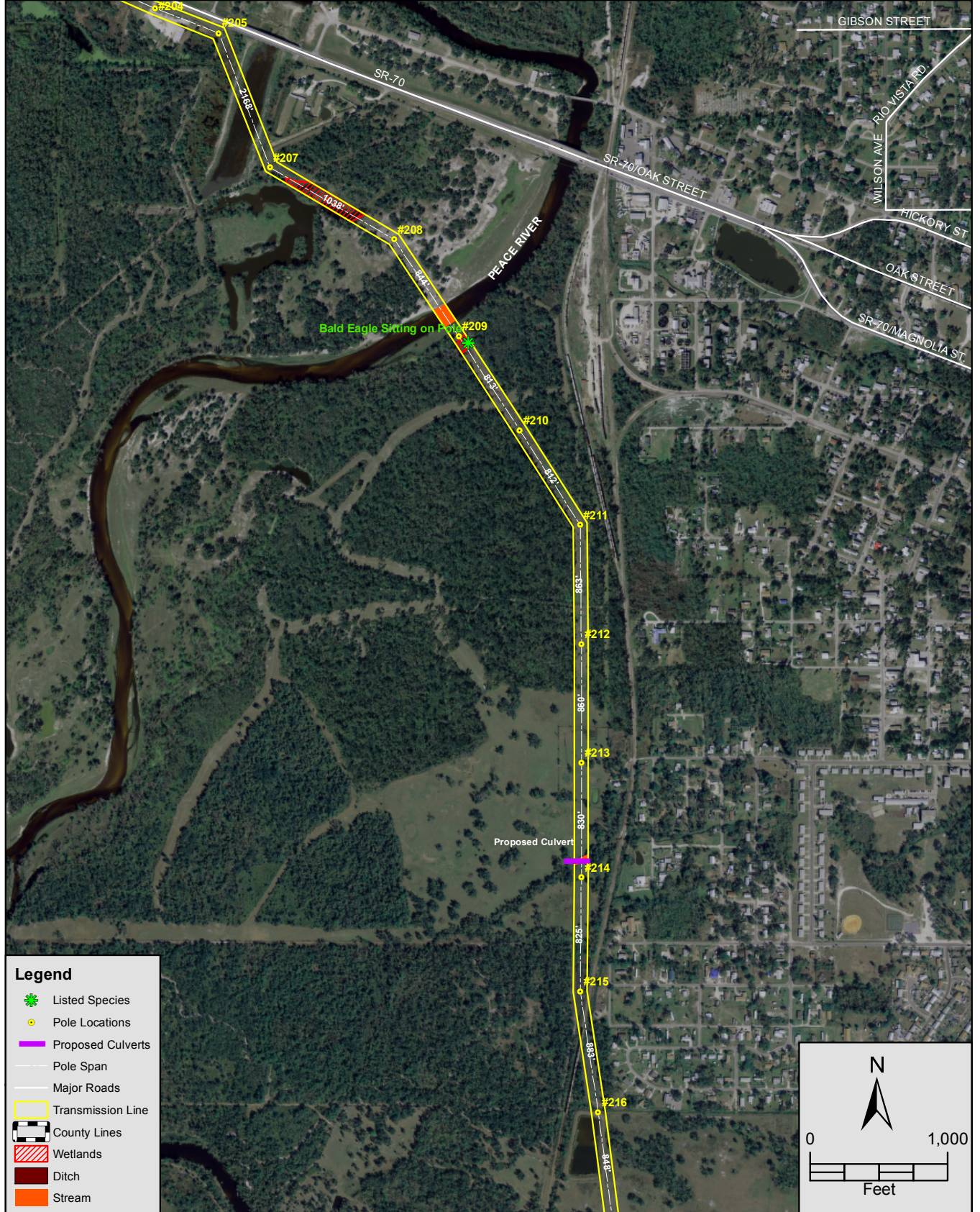


FIGURE 17
 PLAN VIEW - SHEET 14 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

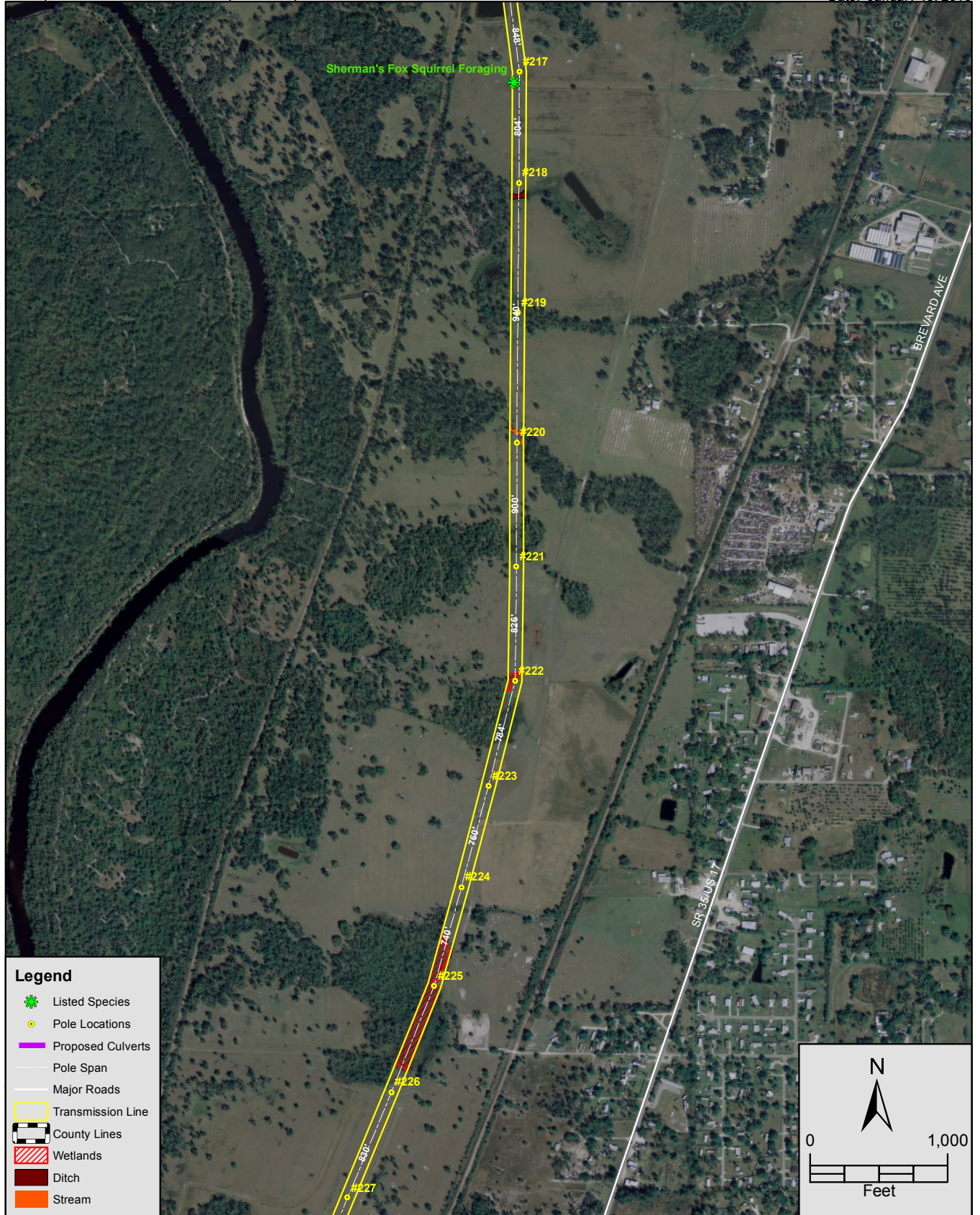


FIGURE 18.
 PLAN VIEW - SHEET 15 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

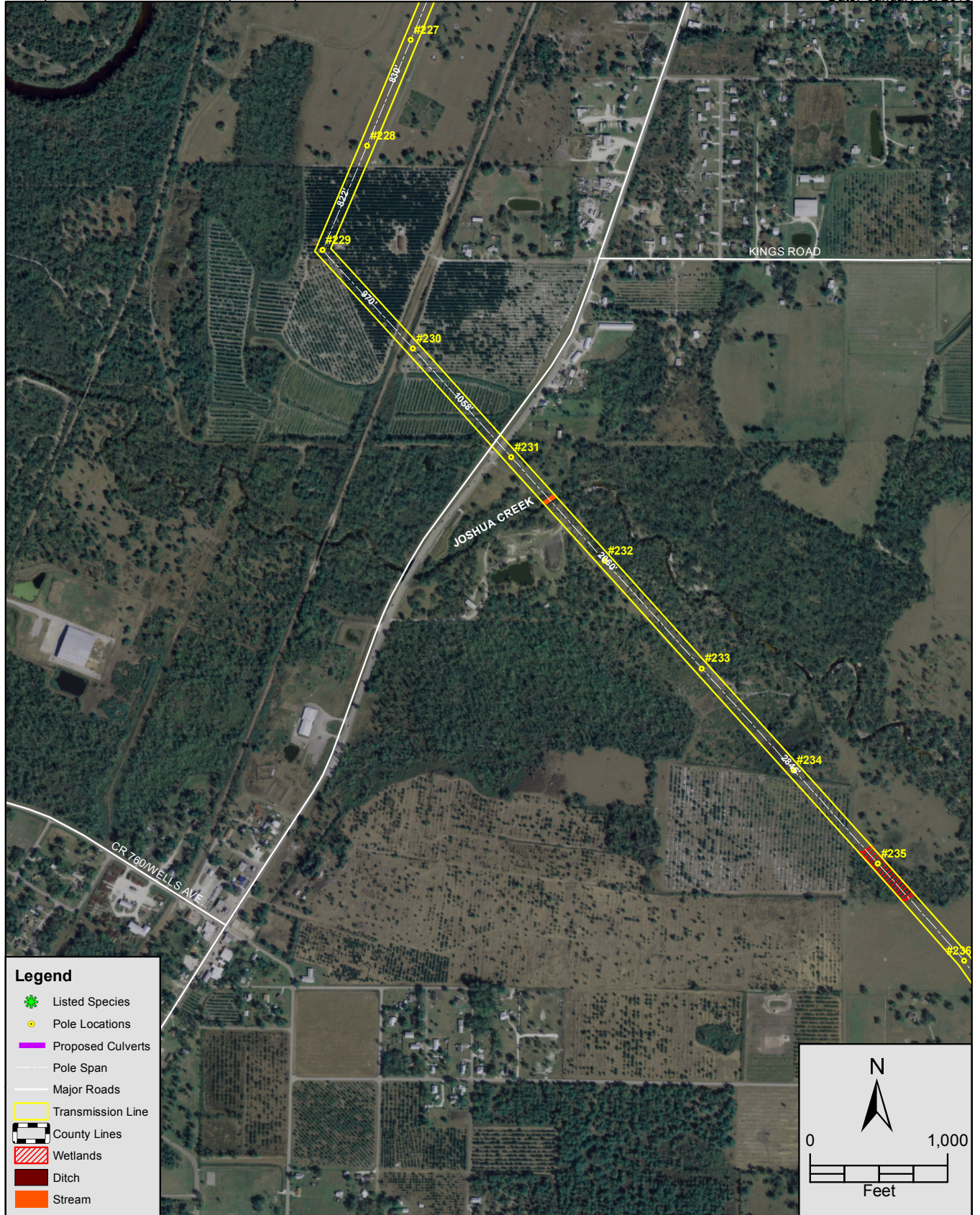


FIGURE 19.
 PLAN VIEW - SHEET 16 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

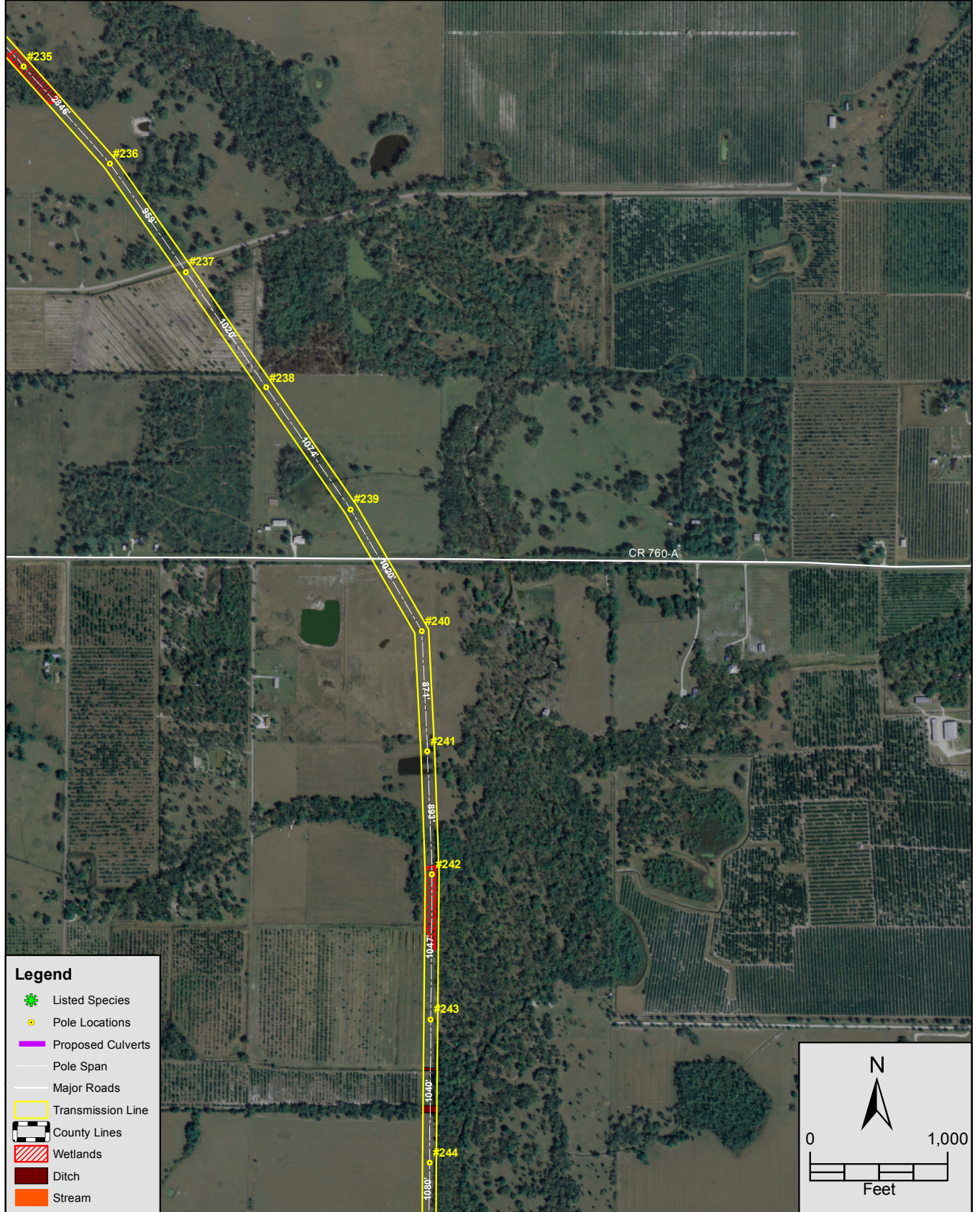


FIGURE 20.
 PLAN VIEW - SHEET 17 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

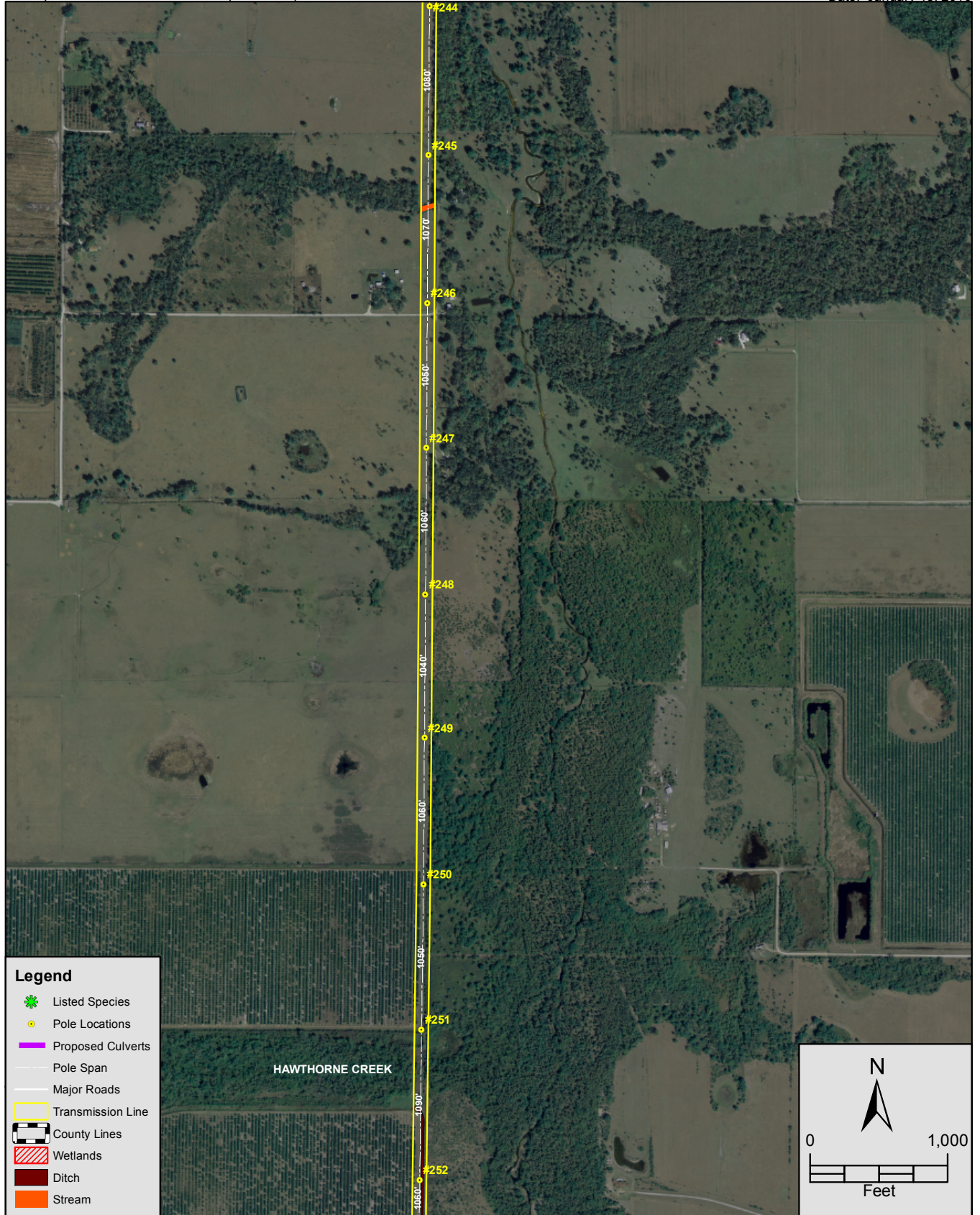


FIGURE 21.
 PLAN VIEW - SHEET 18 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

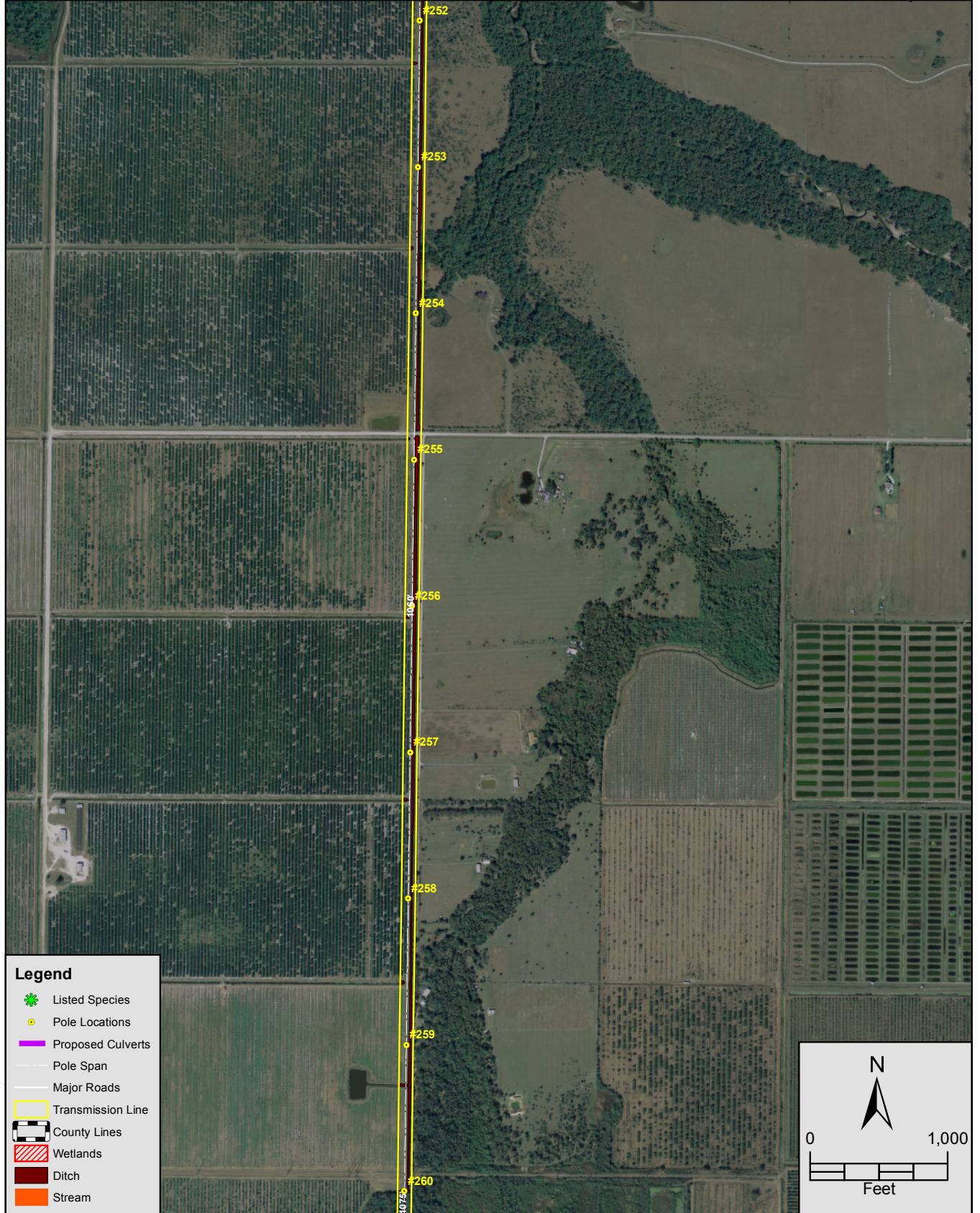


FIGURE 22.
 PLAN VIEW - SHEET 19 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

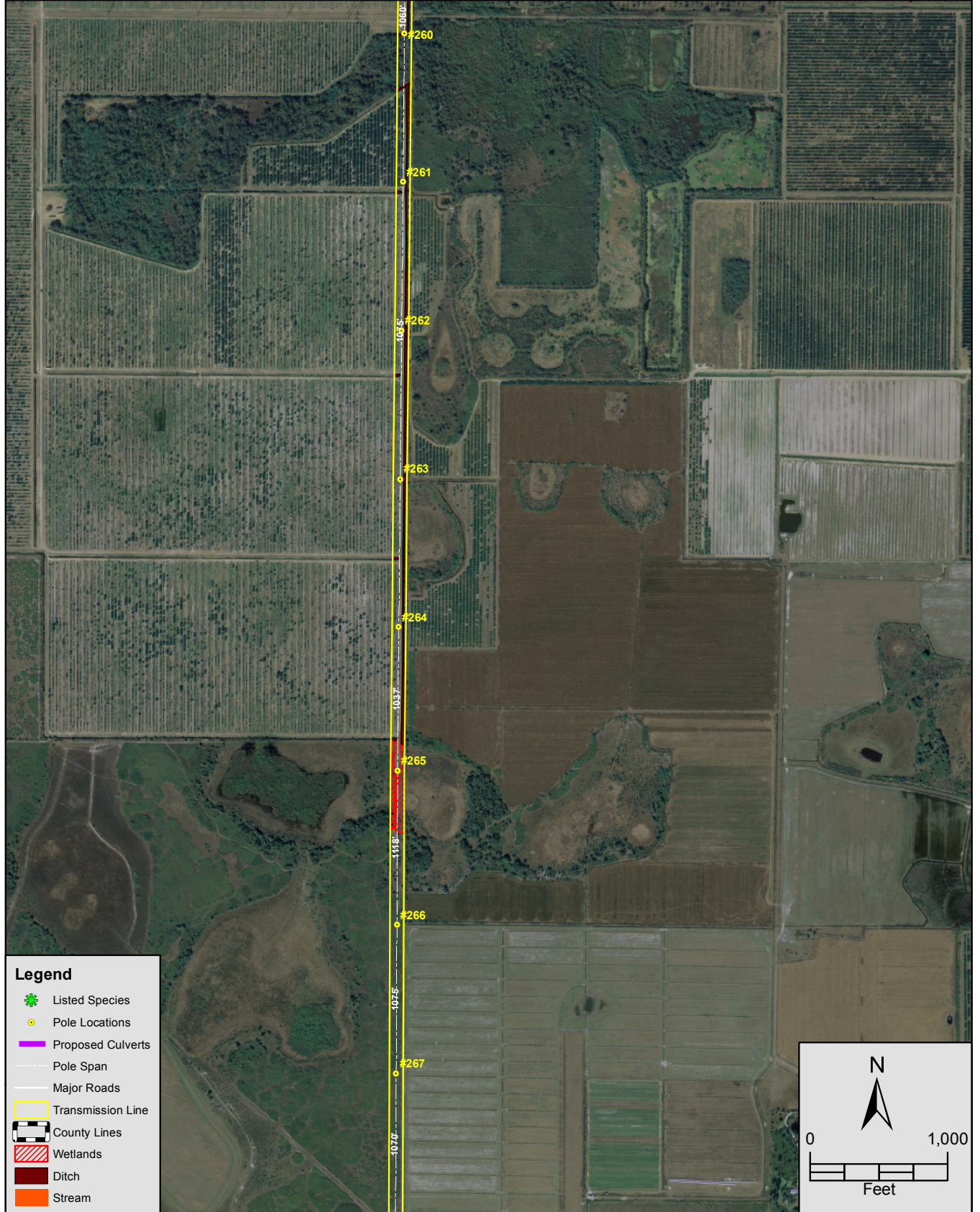


FIGURE 23.
 PLAN VIEW - SHEET 20 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

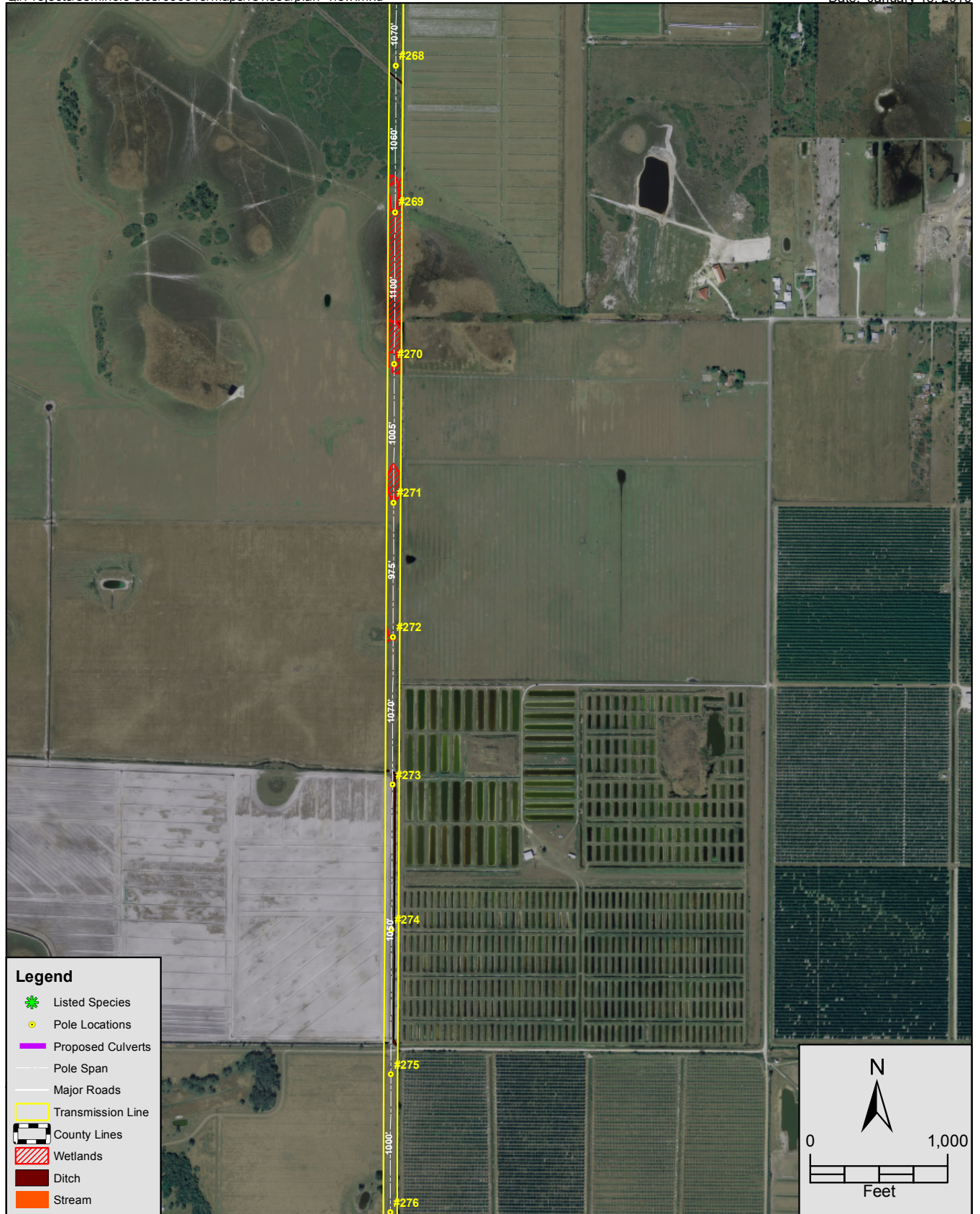


FIGURE 24.
 PLAN VIEW - SHEET 21 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

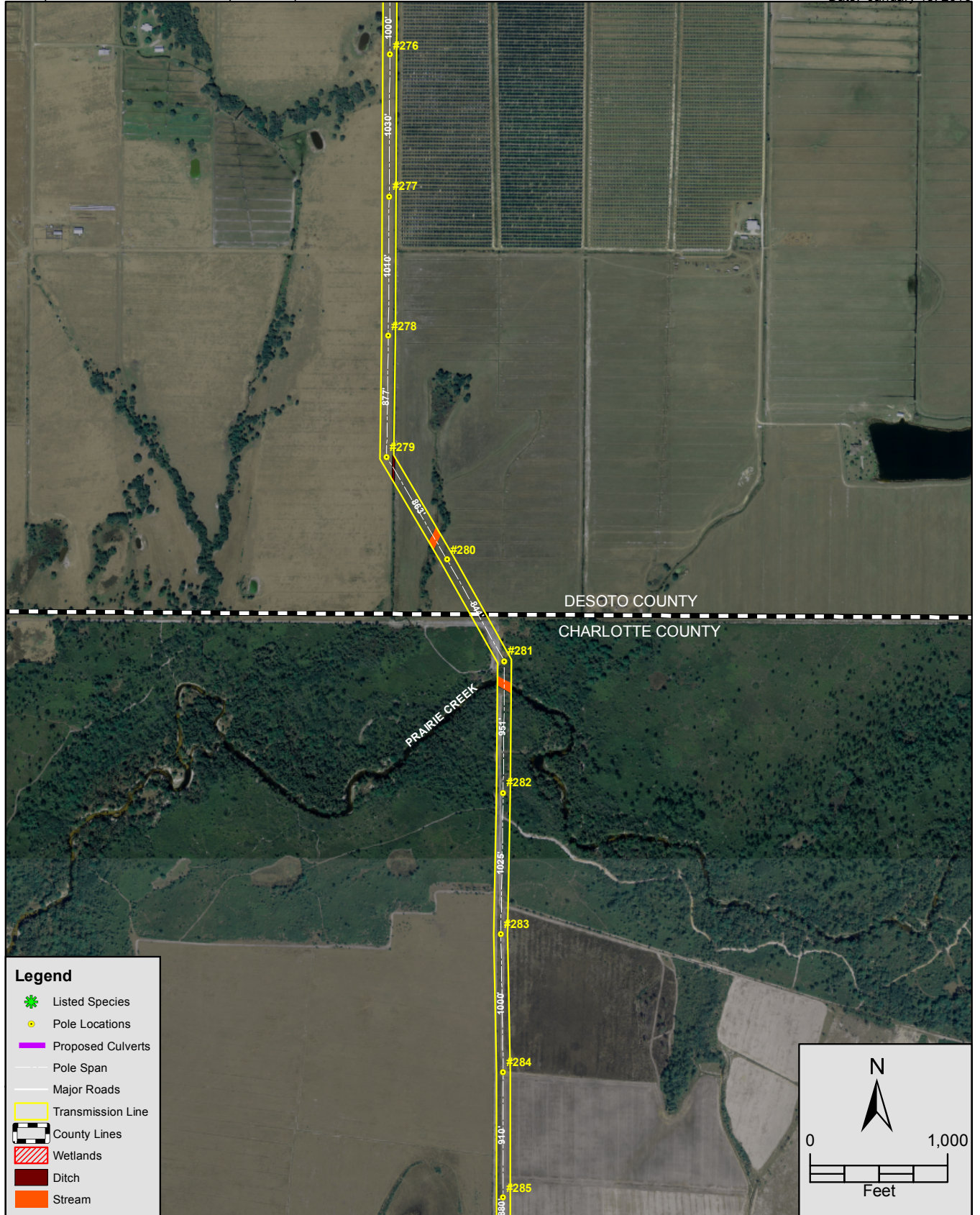


FIGURE 25.
PLAN VIEW - SHEET 22 OF 28
SEMINOLE ELECTRIC COOPERATIVE, INC.
VANDOLAH TO CHARLOTTE 230KV RECONDUTOR
DESOTO AND CHARLOTTE COUNTIES, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

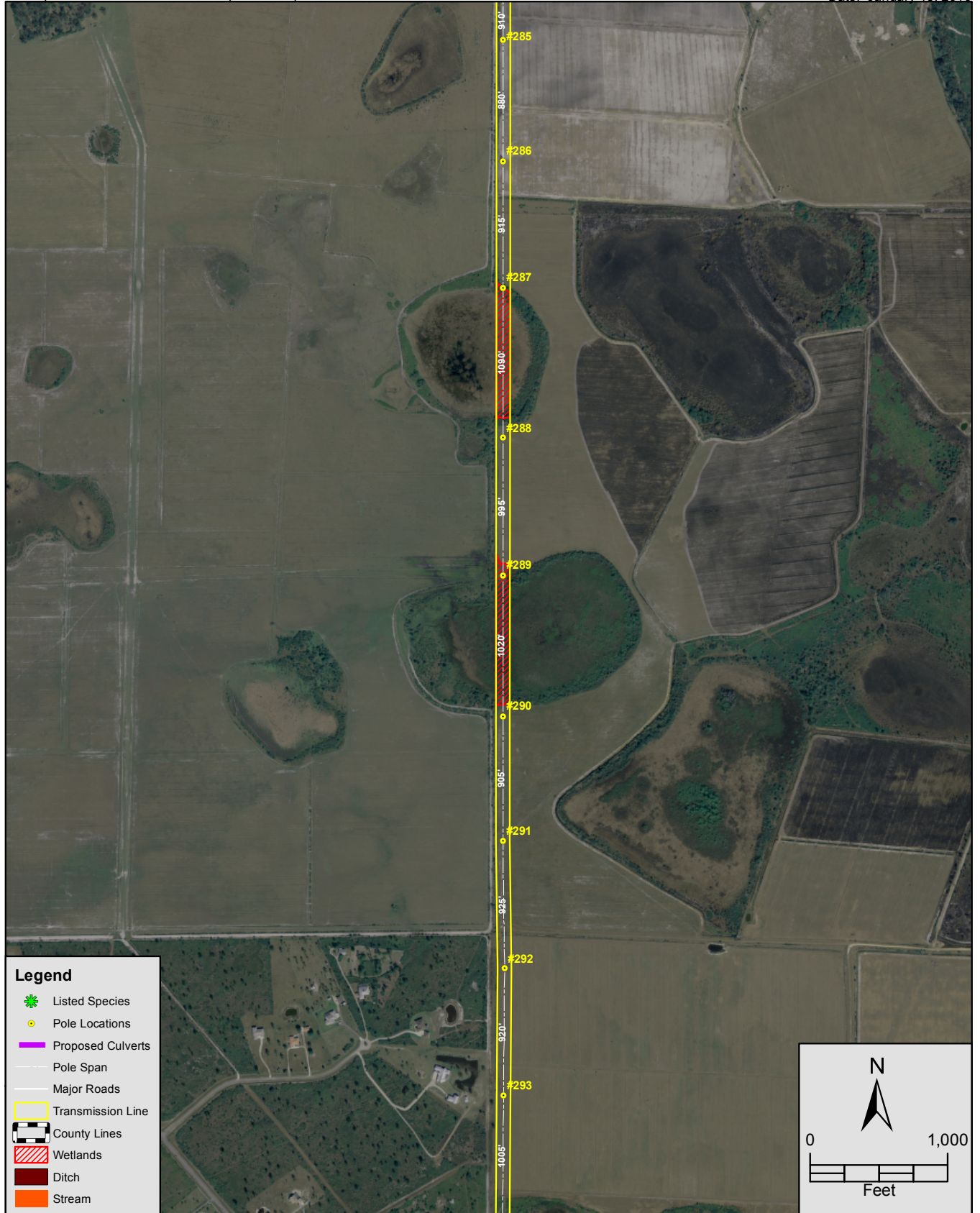


FIGURE 26.
 PLAN VIEW - SHEET 23 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

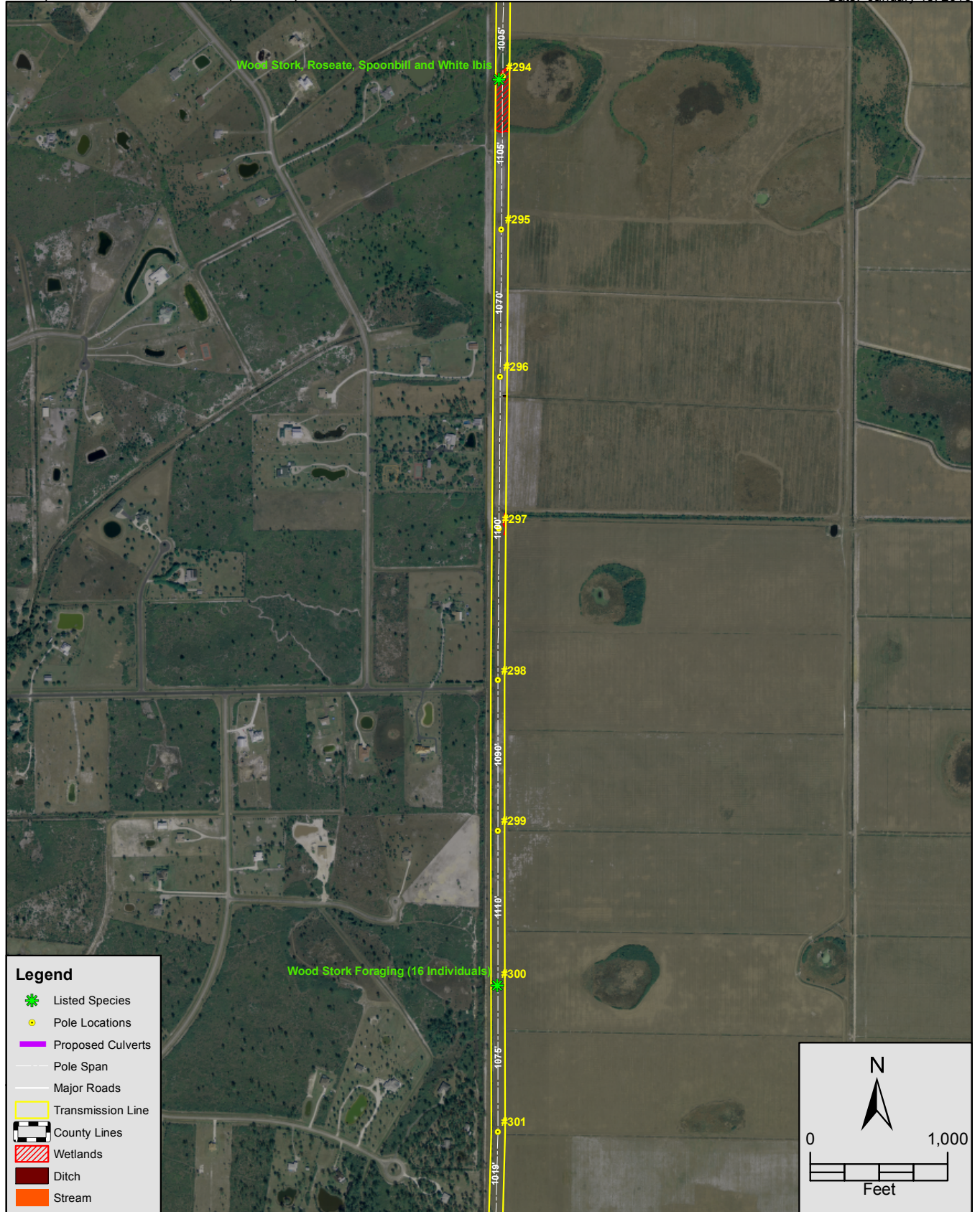


FIGURE 27.
 PLAN VIEW - SHEET 24 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

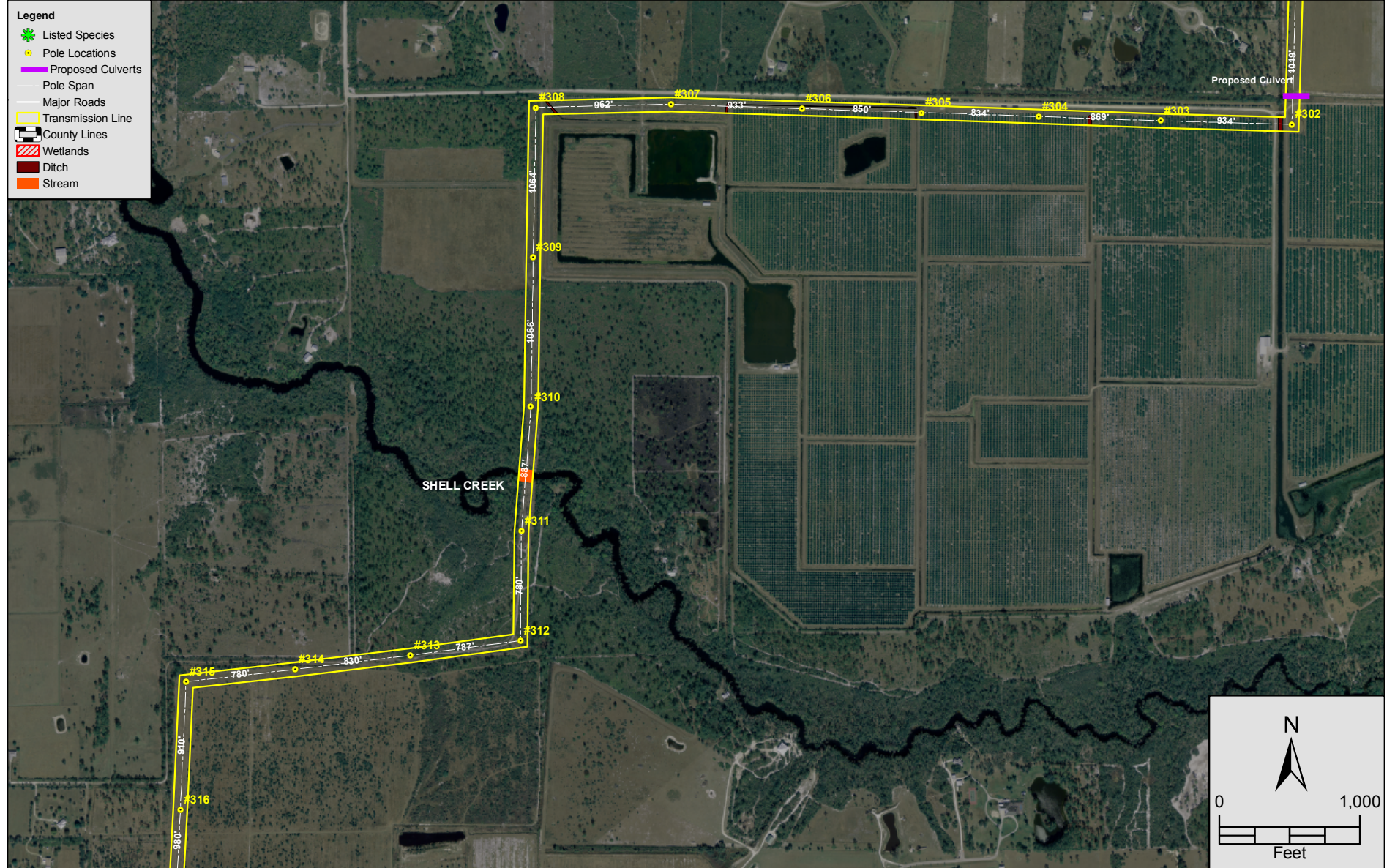


FIGURE 28.
 PLAN VIEW - SHEET 25 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA
 Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

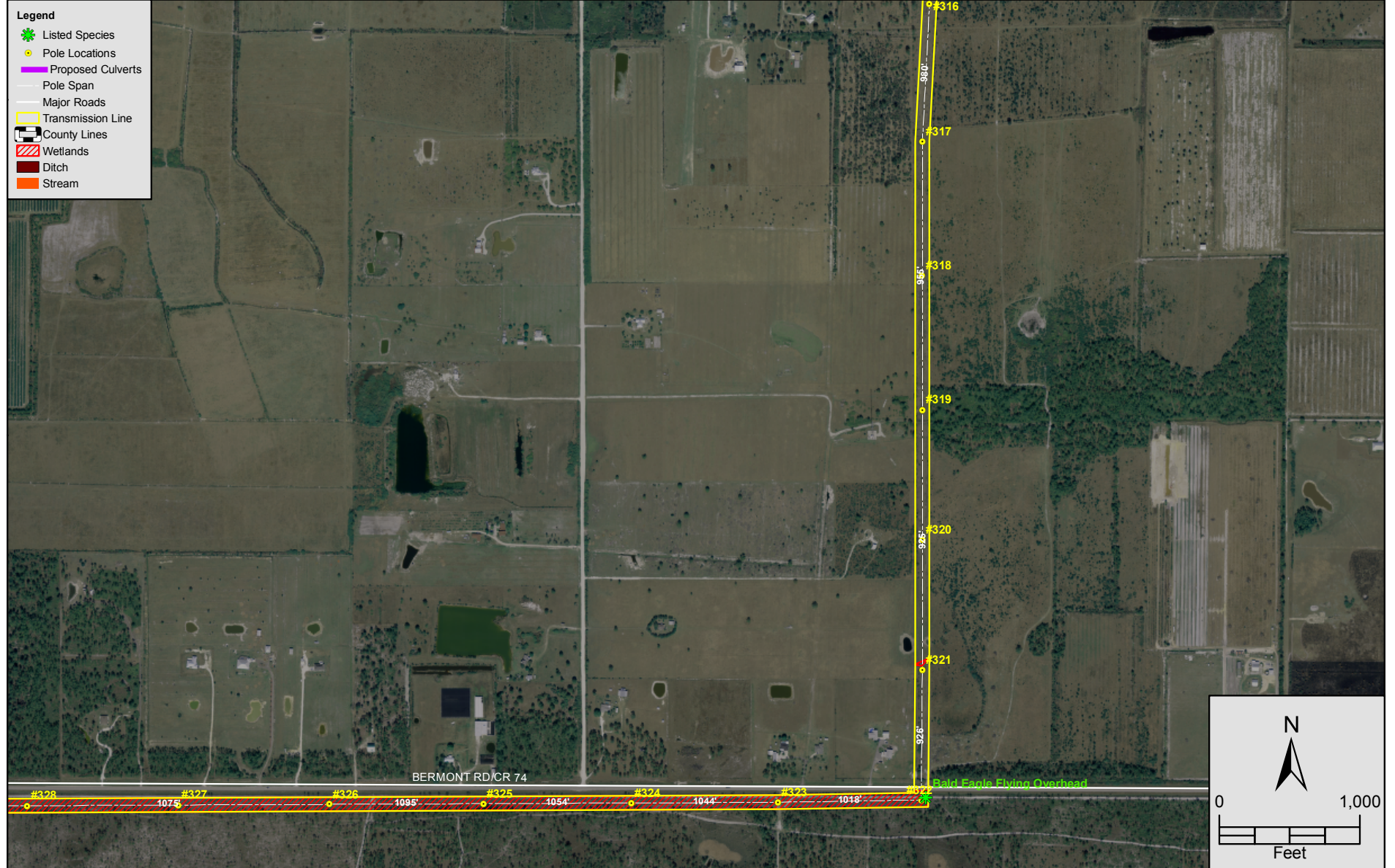


FIGURE 29.
 PLAN VIEW - SHEET 26 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

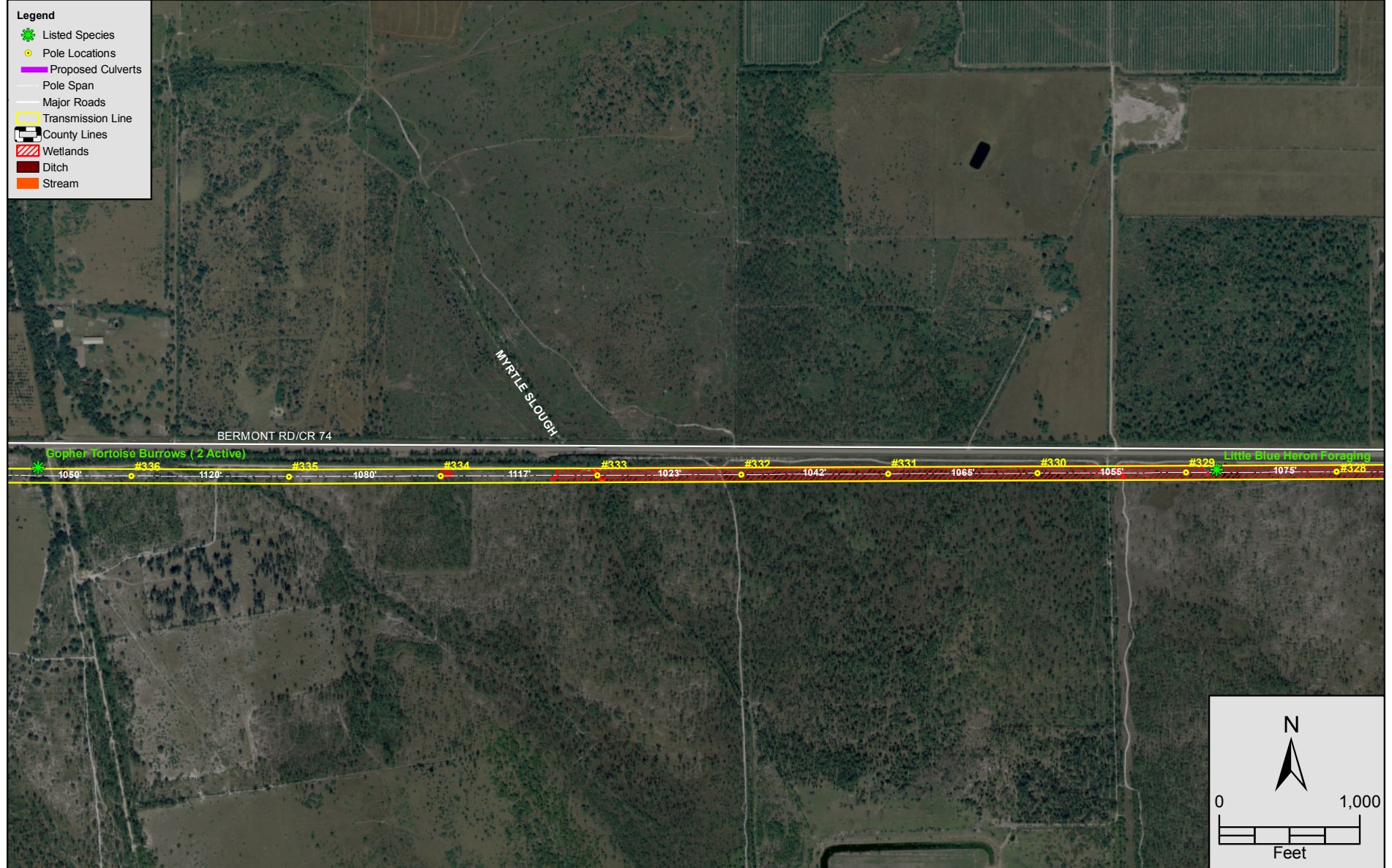


FIGURE 30.
 PLAN VIEW - SHEET 27 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA
 Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

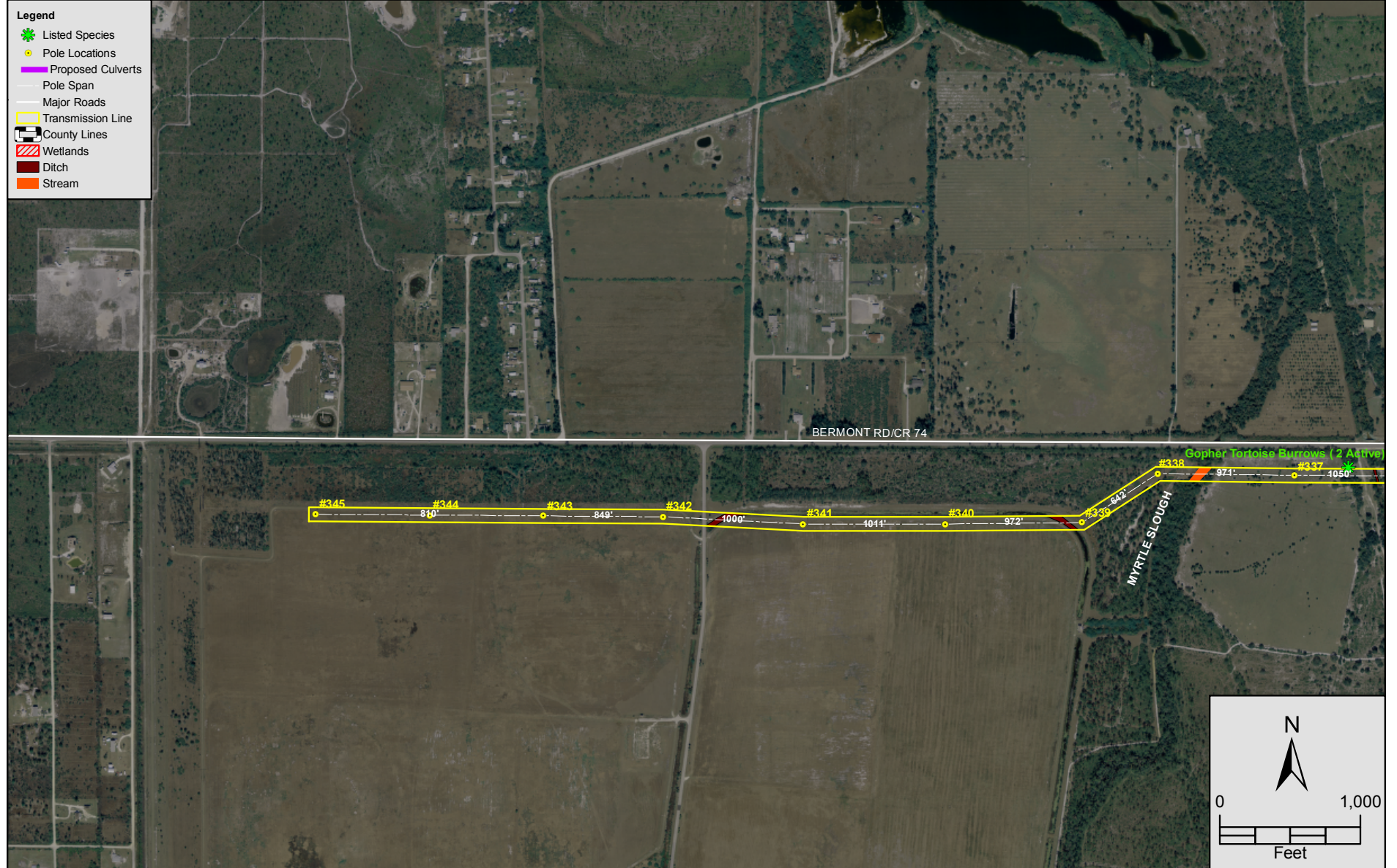


FIGURE 31.
 PLAN VIEW - SHEET 28 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

**SECI RESPONSE 5 TO
DEP-SD COMMENT NO. 5**

**SECTION G FOR ERP AND
MAPS PROVIDING INFORMATION NECESSARY
FOR A LETTER OF CONSENT DETERMINATION**

SECTION G

Application for Authorization to Use Sovereign Submerged Lands

Part 1: Sovereign Submerged Lands title information (see Attachment 5 for an explanation). Please read and answer the applicable questions listed below:

A. I have a sovereign submerged lands title determination from the Division of State Lands which indicates that the proposed project is NOT ON sovereign submerged lands (Please attach a copy of the title determination to the application). Yes ☐ No ☒

- If you answered Yes to Question A and you have attached a copy of the Division of State Lands Title Determination to this application, you do not have to answer any other questions under Part I or II of Section G.

B. I have a sovereign submerged lands title determination from the Division of State Lands which indicates that the proposed project is ON sovereign submerged lands (Please attach a copy of the title determination to the application). Yes ☐ No ☒

- If you answered yes to question B please provide the information requested in Part II. Your application will be deemed incomplete until the requested information is submitted.

C. I am not sure if the proposed project is on sovereign submerged lands (please check here). ☐

- If you have checked this box department staff will request that the Division of State Lands conduct a title determination. If the title determination indicates that the proposed project or portions of the project are located on sovereign submerged lands you will be required to submit the information requested in Part II of this application. The application will be deemed incomplete until the requested information is submitted.

D. I am not sure if the proposed project is on sovereign submerged lands and I DO NOT WISH to contest the Department's findings (please check here). ☒

- If you have checked this box refer to Part II of this application and provide the requested information. The application will be deemed incomplete until the requested information is submitted.

E. It is my position that the proposed project is NOT on sovereign submerged lands (please check here) ☐

- If you have evidence that indicates that the proposed project is not on sovereign submerged lands please attach the documentation to the application. If the Division of State Lands title determination indicates that your proposed project or portion of your proposed project are on sovereign submerged lands you will be required to provide the information requested in Part II of this application.

F. If you wish to contest the findings of the title determination conducted by the Division of State Lands please contact the Department of Environmental Protection's Office of General Counsel. Your proposed project will be deemed incomplete until either the information requested in Part II is submitted or a legal ruling indicates that the proposed project is not on sovereign submerged lands.

Part II: If you were referred to this section by Part I, please provide this additional information. Please note that if your proposed project is on sovereign submerged lands and the below requested information is not provided, your application will be considered incomplete.

A. Provide evidence of title to the subject riparian upland property in the form of a recorded deed, title insurance, legal opinion of title, or a long-term lease which specifically includes riparian rights. Evidence submitted must demonstrate that the application has sufficient title interest in the riparian upland property.

N/A—See Rules 18-21.007(3) and 18-21.004(3)(b), F.A.C.

B. Provide a detailed statement describing the existing and proposed upland uses and activities. For commercial uses, indicate the specific type of activity, such as marina, ship repair, dry storage (including the number of storage spaces), commercial fishing/seafood processing, fish camp, hotel, motel resort restaurant, office complex, manufacturing operation, etc.

Seminole Electric Cooperative, Inc. (SECI) proposes to replace 208 existing H-frame structures and conductors along their existing 48.5-mile long Vandolah to Charlotte, 230-kilovolt (kV) transmission line located in Hardee, Desoto, and Charlotte Counties, Florida. The proposed transmission line is to be constructed typically using 90 to 115-ft aboveground, un-guyed steel poles embedded approximately 22-feet (ft) deep in drilled holes, typically 4.5 to 5 ft in diameter and backfilled using concrete or crushed stone with 1 foot of backfill at the bottom of the poles. Pole height may vary depending on location and span between poles. Where the transmission line turns large, angles, or crosses other major linear facilities, the single-pole structure may require guys and anchors. Span lengths between structures typically vary between 605 and 1,118 ft, depending on site-specific right-of-way widths and other design considerations. Appropriate temporary matting will be used to cross wetlands where needed. In addition, SECI plans on the replacement of one roadway crossing culvert and installation of three roadway crossing culverts at three separate locations under the power line along County Road (CR) 661/663 from the crossing of Vandolah Road and Fort Green-Ona Road in Hardee County on the north to Bermont Road/CR 74 east of Charlotte County on the south. The main purpose of the culvert replacement and installations is to create safe travel trails over the drainages for powerline maintenance workers and vehicles. Construction of the transmission line/culvert crossings is scheduled in three phases:

- **Phase 1 – March 1, 2010 to May 15, 2010**
- **Phase 2 – September 1, 2010 to November 15, 2010**
- **Phase 3 – March 1, 2011 to May 15, 2011**

For rental operations, such as trailer or recreational vehicle parks and apartment complexes, indicate the number of wet slip units/spaces available for rent or lease and describe operational details (e.g., are spaces rented on a month-to-month basis or through annual leases).

For multi-family residential developments, such as condominiums, townhomes, or subdivisions, provide the number of living units/lots and indicate whether or not the common property (including the riparian upland property) is or will be under the control of a homeowners association.

For projects sponsored by a local government, indicate whether or not the facilities will be open to the general public. Provide a breakdown of any fees that will be assessed, and indicate whether or not such fees will generate revenue or will simply cover costs associated with maintaining the facilities.

C. Provide a detailed statement describing the existing and proposed activities located on or over the sovereign submerged lands at the project site. This statement must include a description of docks and piers, types of vessels (e.g., commercial fishing, liveaboards, cruise ships, tour boats), length and draft of vessels, sewage pumped facilities, fueling facilities, boat hoists, boat ramps, travel lifts, railways, and any other structure or activities existing or proposed to be located waterward of the mean/ordinary high water line.

No activities (pole placement) will occur on sovereign submerged lands. SECI proposes to replace 208 existing H-frame structures and conductors along their existing 48.5-mile long Vandolah to Charlotte, 230-kV transmission line located in Hardee, Desoto, and Charlotte Counties, Florida. The proposed transmission line is to be constructed typically using 90 to 115-ft aboveground, un-guyed steel poles

embedded approximately 22-ft deep in drilled holes, typically 4.5 to 5 ft in diameter and backfilled using concrete or crushed stone with 1 foot of backfill at the bottom of the poles. Pole height may vary depending on location and span between poles. Where the transmission line turns large, angles, or crosses other major linear facilities, the single-pole structure may require guys and anchors. Span lengths between structures typically vary between 605 and 1,118 ft, depending on site-specific right-of-way widths and other design considerations. Appropriate temporary matting will be used to cross wetlands where needed. Construction of the transmission line/culvert crossings is scheduled in three phases:

- Phase 1 – March 1, 2010 to May 15, 2010
- Phase 2 – September 1, 2010 to November 15, 2010
- Phase 3 – March 1, 2011 to May 15, 2011

Plan views of the proposed new pole line construction overlaid on recent aerial photographs are provided on the attached figures. Plan view and profile sections depicting proposed construction along the transmission line are provided on Sheets WL-1 through WL-79 in the FIGURES section of the ERP application.

Control measures will be utilized as required preventing erosion during construction. Routine maintenance of the easement following initial installation will minimize ground cover disturbance and, therefore, reduce potential for erosion. Power poles will be installed where identified on the attached figures. The proposed work areas within the existing right-of-way will be restricted to construction corridors approximately 100 ft in width. The construction process for power pole placement has been designed in the most environmentally sensitive manner possible. By incorporating and implementing Best Management Practices (BMPs) before, during, and after construction (e.g., use of hay bales/silt screens along the edges of wetlands/surface waters), the proposed project activities should avoid or minimize significant primary or secondary impacts to jurisdictional wetlands or surface waters to the greatest extent practicable.

SECI will use standard utility line trucks and cranes to facilitate the pole placement within the project area. The vehicles will be equipped with an auger to allow the placement of the transmission poles in the ground. The vehicles will generally track within the existing easement along existing access roads/disturbed uplands to minimize the impact area required. After pole placement, the augered soil surrounding the power pole will be removed or spread to the appropriate ground contours. Existing poles to be replaced will be cut at the ground level and be removed.

Following this work, the power poles will be prepared for transmission line stringing. This work will have no impacts to sovereign submerged lands because it is completed by use of equipment placed in uplands outside the ordinary high water line (i.e., along existing access roads or from major roadway rights-of-way) where wire will be pulled along the transmission line from pole to pole. Following the completion of wire stringing, no other potential disturbances will occur as right-of-way cleanup signals the end of construction.

It should be noted that the mid-span conductor heights of the power line crossings along named watercourses will meet or exceed the National Electric Safety Code and SECI standards (i.e., mid-span conductor heights will be equal to or greater than the existing line clearance above the water levels). For example, the mid-span conductor height above the Peace River will be 37.1 feet.

Where the proposed power line activities occur adjacent or in proximity to wetlands/water bodies, appropriate sediment control methods will be used as required. Sediment controls include the installation of staked silt fences with hay bales along uplands. Silt screens will also be placed down gradient of construction areas, as required. Details of the proposed silt screens to be utilized for the project are provided on Silt and Turbidity Detail drawings in the FIGURES section of the ERP application.

If slips are existing and/or proposed, please indicate the number of powerboat slips and sailboat slips and the percentage of those slips available to the general public on a "first come, first served" basis. This statement must include a description of channels, borrow sites, bridges, groins, jetties, pipelines, or other utility

crossings, and any other structures or activities existing or proposed to be located waterward of the mean/ordinary high water line. For shoreline stabilization activities, this statement must include a description of seawalls, bulkheads, riprap, filling activities, and any other structure or activities existing or proposed to be located along the shoreline.

D. Provide the linear footage of shoreline at the mean/ordinary high water line owned by the application which borders sovereign submerged lands.

Sovereign submerged lands are those natural or historically submerged lands owned by the State of Florida. They include lands waterward of the ordinary high water line beneath navigable fresh water (also tidally influenced lands waterward of the mean high water line which is non-applicable for this project). That being said, it is unlikely that all named waterbodies crossed by the existing 230 kV transmission line corridor are navigable. Nine named streams are crossed; two (Oak Creek in Hardee County and Myrtle Slough in Charlotte County) are crossed twice. Figure 1 (attached) is a recent 1"=1000 ft. aerial photograph showing the corridor in relation to streams. For each named stream crossed, a more detailed 1"=200 ft. aerial photograph is provided. The following is a list of those named streams crossed by the corridor from north to south, the linear footage of shoreline at the ordinary high water lines encompassed within the 100 ft. corridor right-of-way, and the sheet number in Figure 1 showing detail:

Hardee County:

Oak Creek (crossing 1): 236 linear feet. Sheet 1A of 28 in Figure 1

Oak Creek (crossing 2): 245 linear feet. Sheet 4A of 28 in Figure 1

Limestone Creek: 212 linear feet. Sheet 8A of 28 in Figure 1

DeSoto County:

Walker Branch: 243 linear feet. Sheet 11A of 28 in Figure 1

Peace River: 200 linear feet. Sheet 14A of 28 in Figure 1

Joshua Creek: 200 linear feet. Sheet 16A of 28 in Figure 1

Hawthorne Creek: 202 linear feet. Sheet 18A of 28 in Figure 1

Charlotte County:

Prairie Creek: 215 linear feet. Sheet 22A of 28 in Figure 1

Shell Creek: 198 linear feet. Sheet 25A of 28 in Figure 1

Myrtle Slough (crossing 1): 274 linear feet. Sheet 27A of 28 on Figure 1

Myrtle Slough (crossing 2): 259 linear feet. Sheet 28A of 28 on Figure 1

E. Provide a recent aerial photo of the area. A scale of 1"=200' is preferred. Photos are generally available at minimal cost from your local government property appraiser's office or from district Department of Transportation offices. Indicate on the photo the specific location of your property/project site.

Figure 1 (attached) is a recent aerial photo of the project area overlain with the project boundary (100 ft. wide 230 kV transmission line corridor). Included within Figure 1 are 1"=200 ft. aeriels showing detail for each named stream crossing. The 1"=200 ft. aeriels are labeled sheet 1A of 28, for example, and are placed with the corresponding 1"=1000 ft. sheet (sheet 1 of 28 is followed by sheet 1A of 28).

PROPRIETARY PROJECT DESCRIPTIONS

Please check the most applicable activity which applies to your project(s):

Leases

- ☐ Commercial marinas (renting wet slips) including condos, etc., if 50% or more of their wet slips are available to the general public
- ☐ Public/Local governments
- ☐ Yacht Clubs/Country Clubs (when a membership is required)
- ☐ Condominiums (requires upland ownership)
- ☐ Commercial Uplands Activity (temporary docking and/or fishing pier associated with upland revenue generating activities, i.e., restaurants, hotels, motels) for use of the customer at not charge
- ☐ Miscellaneous Commercial Upland Enterprises where there is a charge associated with the use of overwater structure (Charter Boats, Tour Boats, Fishing Piers)
- ☐ Ship Building/Boat Repair Service Facilities
- ☐ Commercial Fishing Related (Offloading, Seafood Processing)
- ☐ Private Single-family Residential Docking Facilities; Townhome Docking Facilities; Subdivision Docking Facilities (upland lots privately owned)

Public Easements and Use Agreements

- ☐ Miscellaneous Public Easements and Use Agreements
- ☐ Bridge Right-of-way (DOT, local government)
- ☐ Breakwater of groin
- ☐ Subaqueous Utility Cable (TV, telephone, electrical)
- ☐ Subaqueous Outfall or Intake
- ☐ Subaqueous Utility Water/Sewer
- ☐ Overhead Utility w/Support Structure on Sovereign Submerged Lands
- ☐ Disposal Site for Dredged Material
- ☐ Pipeline (gas)
- ☐ Borrow Site

Private Easements

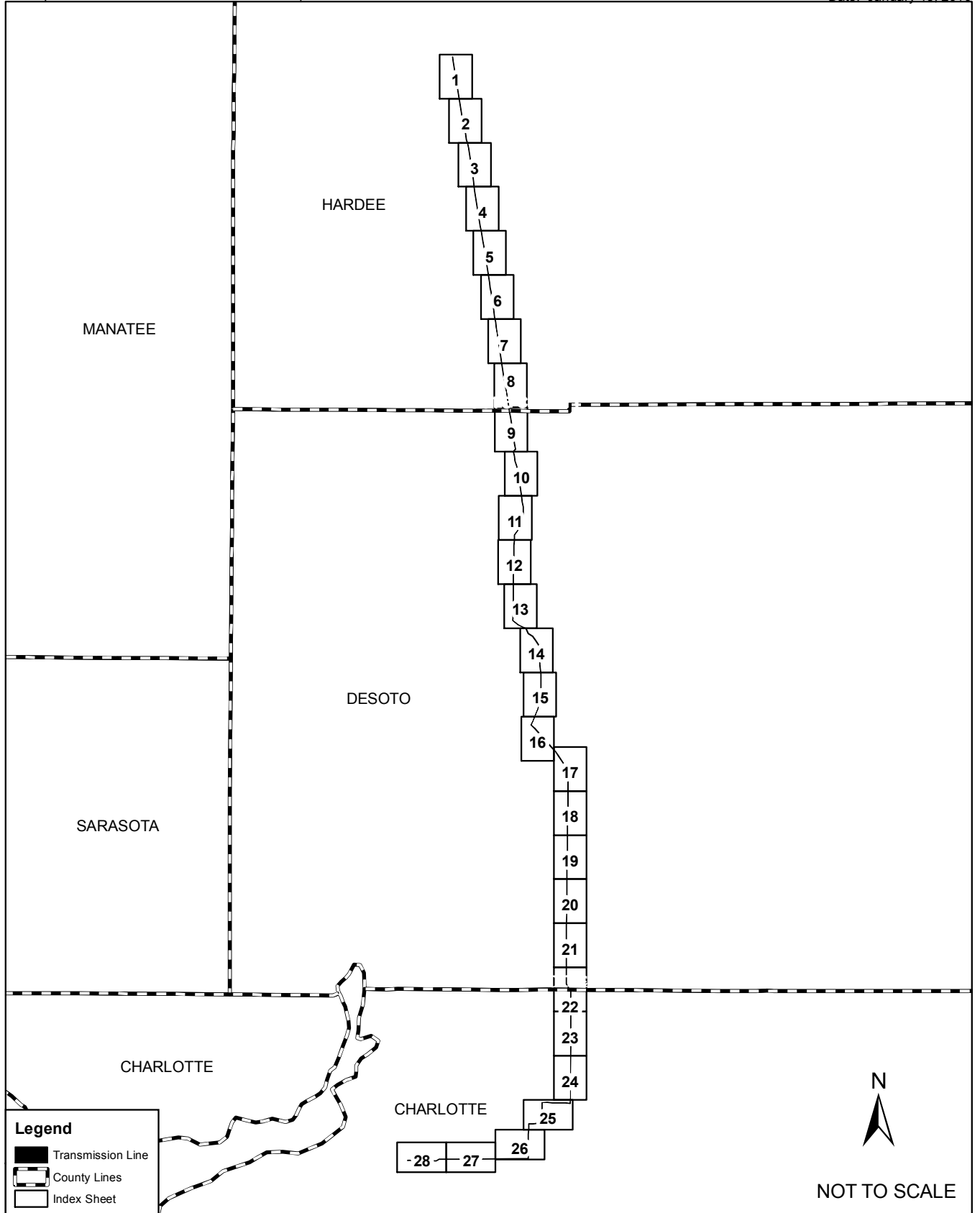
- ☐ Miscellaneous Private Easements
- ☐ Bridge Right-of-way
- ☐ Breakwater Groin
- ☐ Subaqueous Utility Cable (TV, telephone, electrical)
- ☐ Subaqueous Outfall or Intake
- ☐ Subaqueous Utility Water/Sewer
- ☐ Overhead Utility Crossing
- ☐ Disposal Site for Dredged Material
- ☐ Pipeline (gas)

Consents of Use

- ☒ Aerial Utility Crossing w/no support structures on sovereign submerged lands
- ☐ Private Dock
- ☐ Public Dock
- ☐ Multi-family Dock
- ☐ Fishing Pier (private or Multi-family)
- ☐ Private Boat Ramp
- ☐ Sea Wall
- ☐ Dredge
- ☐ Maintenance Dredge
- ☐ Navigation Aids/Markers
- ☐ Artificial Reef
- ☐ Riprap
- ☐ Public Boat Ramp
- ☐ Public Fishing Pier
- ☐ Repair/Replace Existing Public Fishing Pier
- ☐ Repair/Replace Existing Private Dock
- ☐ Repair/Replace Existing Public Dock
- ☐ Repair/Replace Existing Multi-family Dock
- ☐ Repair/Replace Existing Fishing Pier (Private or Multi-family)
- ☐ Repair/Replace Existing Private Boat Ramp
- ☐ Repair/Replace Existing Sea Wall, Revetments, or Bulkheads
- ☐ Repair/Replace/Modify structures/activities within an exiting lease, easement, management agreement or use agreement area or repair/replace existing grandfathered structures
- ☐ Repair/Replace Existing Public Boat Ramp

Miscellaneous

- ☐ Biscayne Bay Letters of Consistency/Inconsistency w/258.397, F.S.
- ☐ Management Agreements - Submerged Lands
- ☐ Reclamation
- ☐ Purchase of Filled, Formerly Submerged Lands
- ☐ Purchase of Reclaimed Lake Bottom
- ☐ Treasure Salvage
- ☐ Insect Control Structures/Swales
- ☐ Miscellaneous projects which do not fall within the activity codes listed above



INDEX MAP FOR AERIAL PHOTOS FOR PROJECT AREA
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE, DESOTO AND CHARLOTTE COUNTIES, FLORIDA

Sources: Prepared by ECT, 2010.



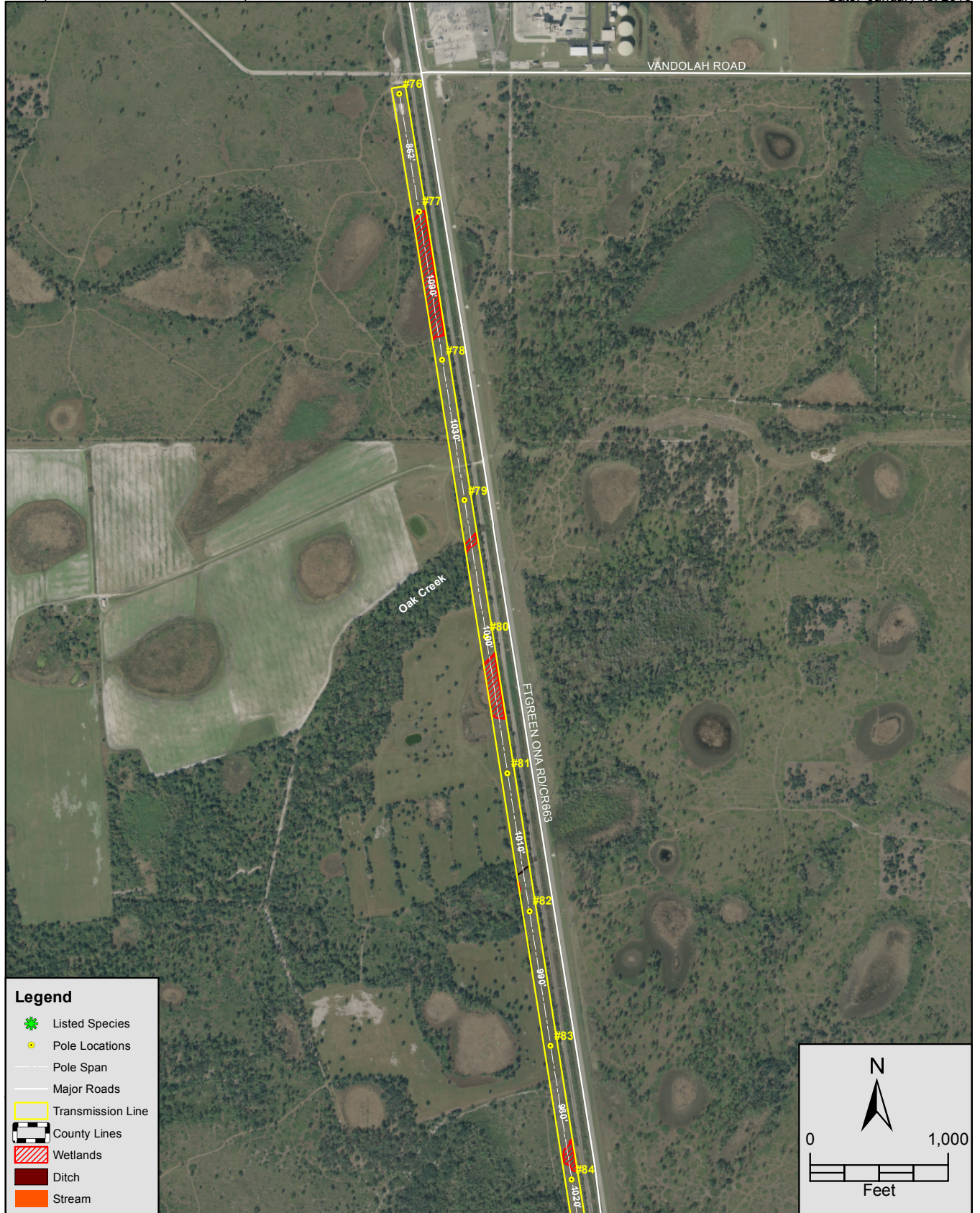
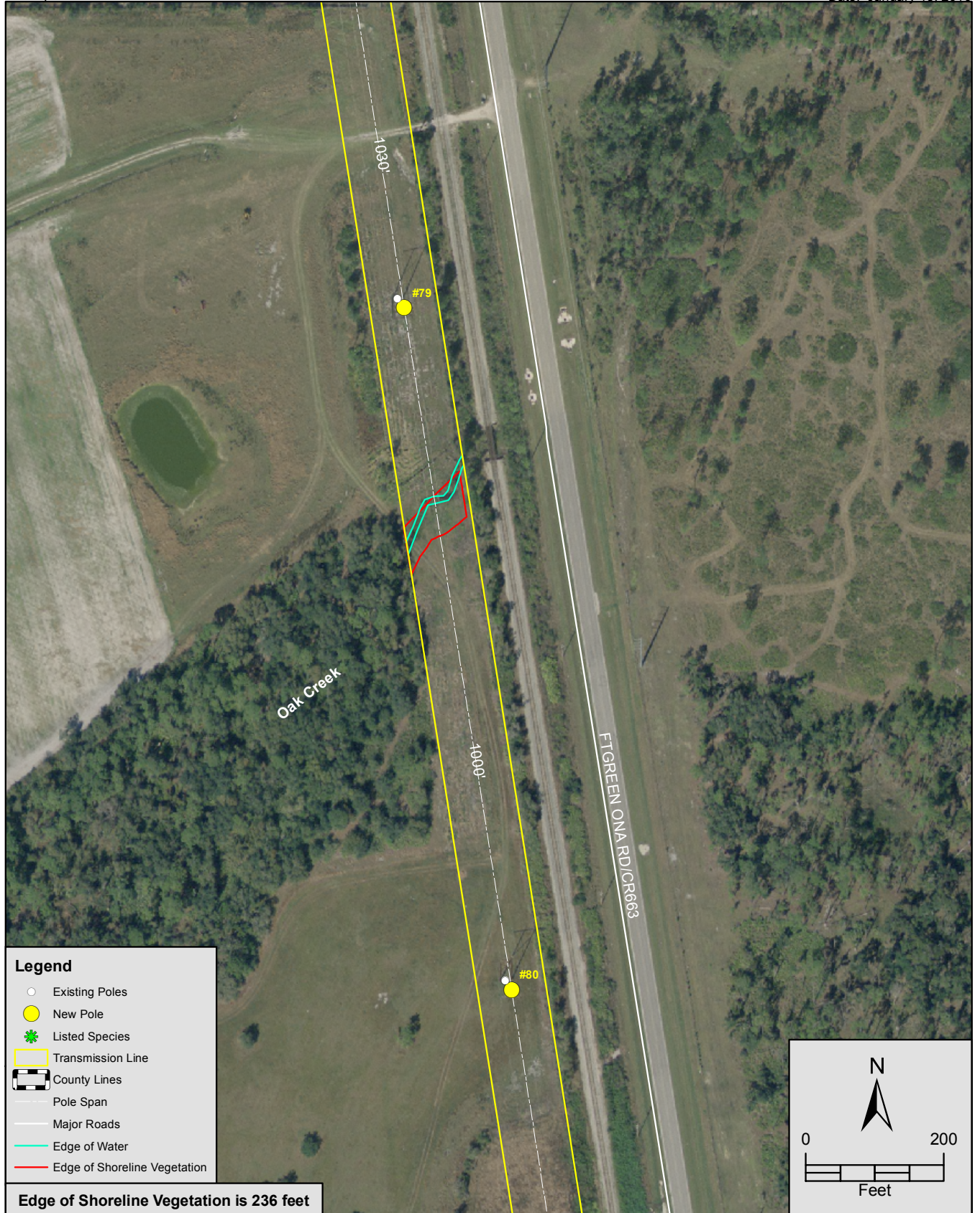


FIGURE 1 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 1 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 1A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



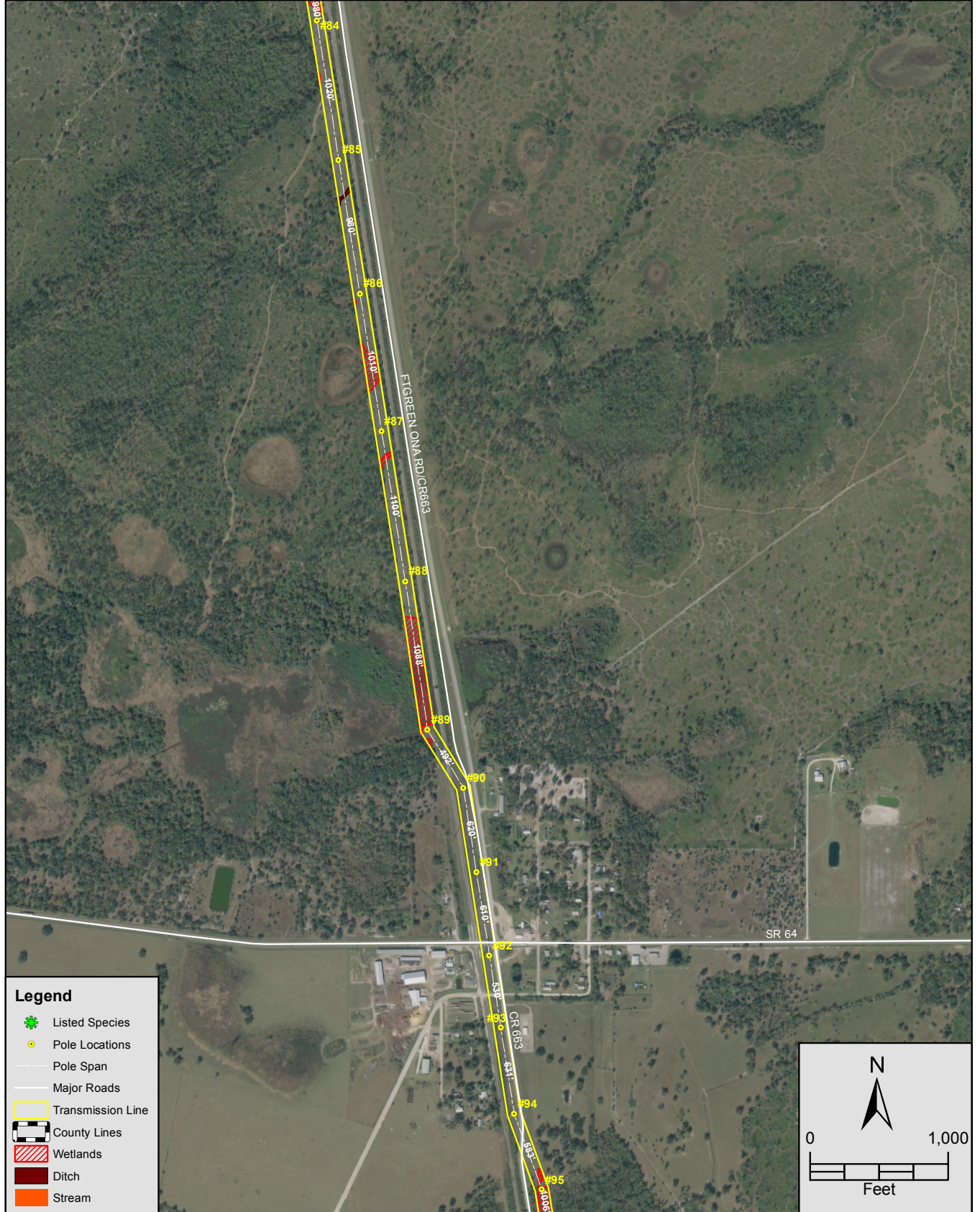


FIGURE 2 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 2 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

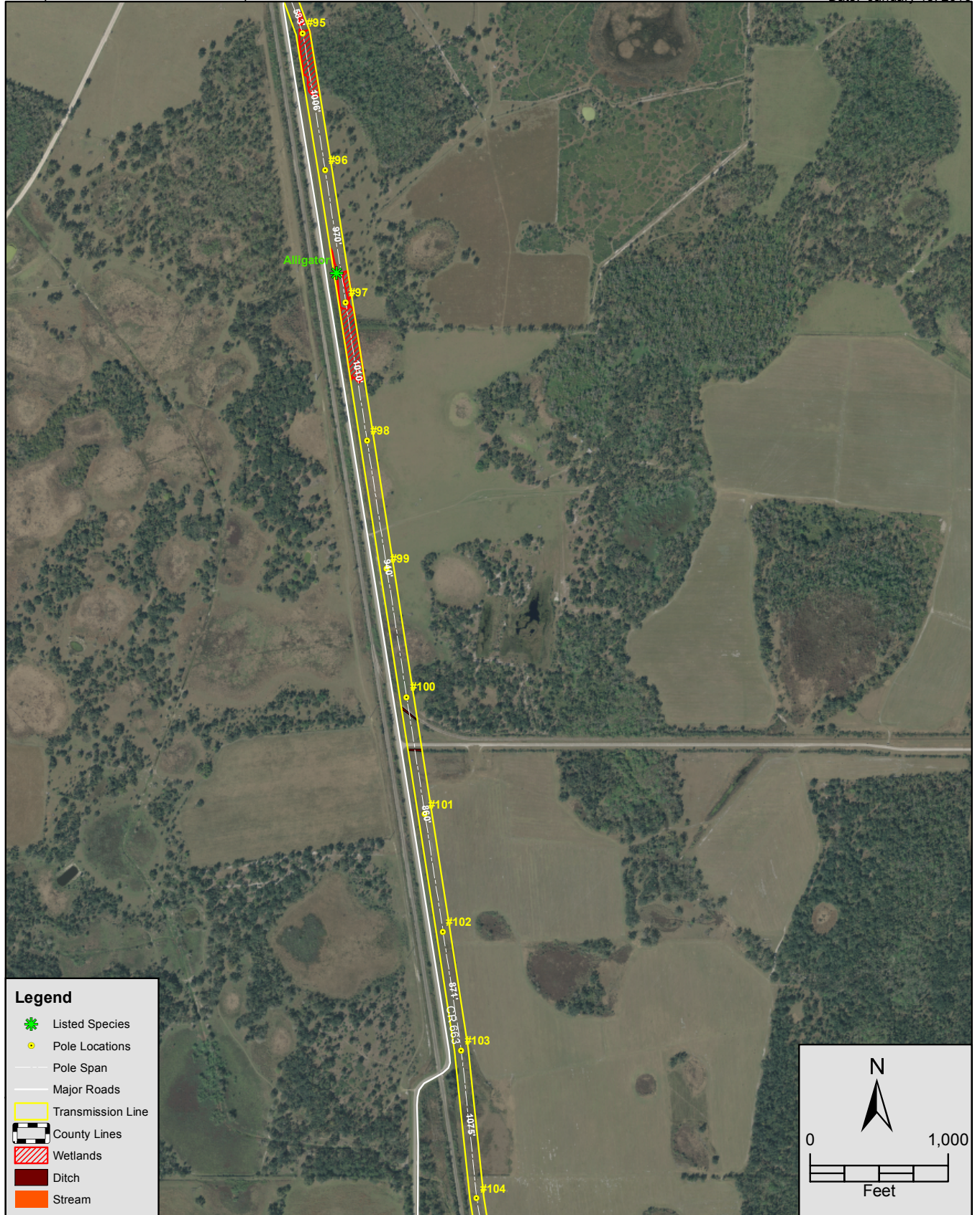


FIGURE 3 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 3 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

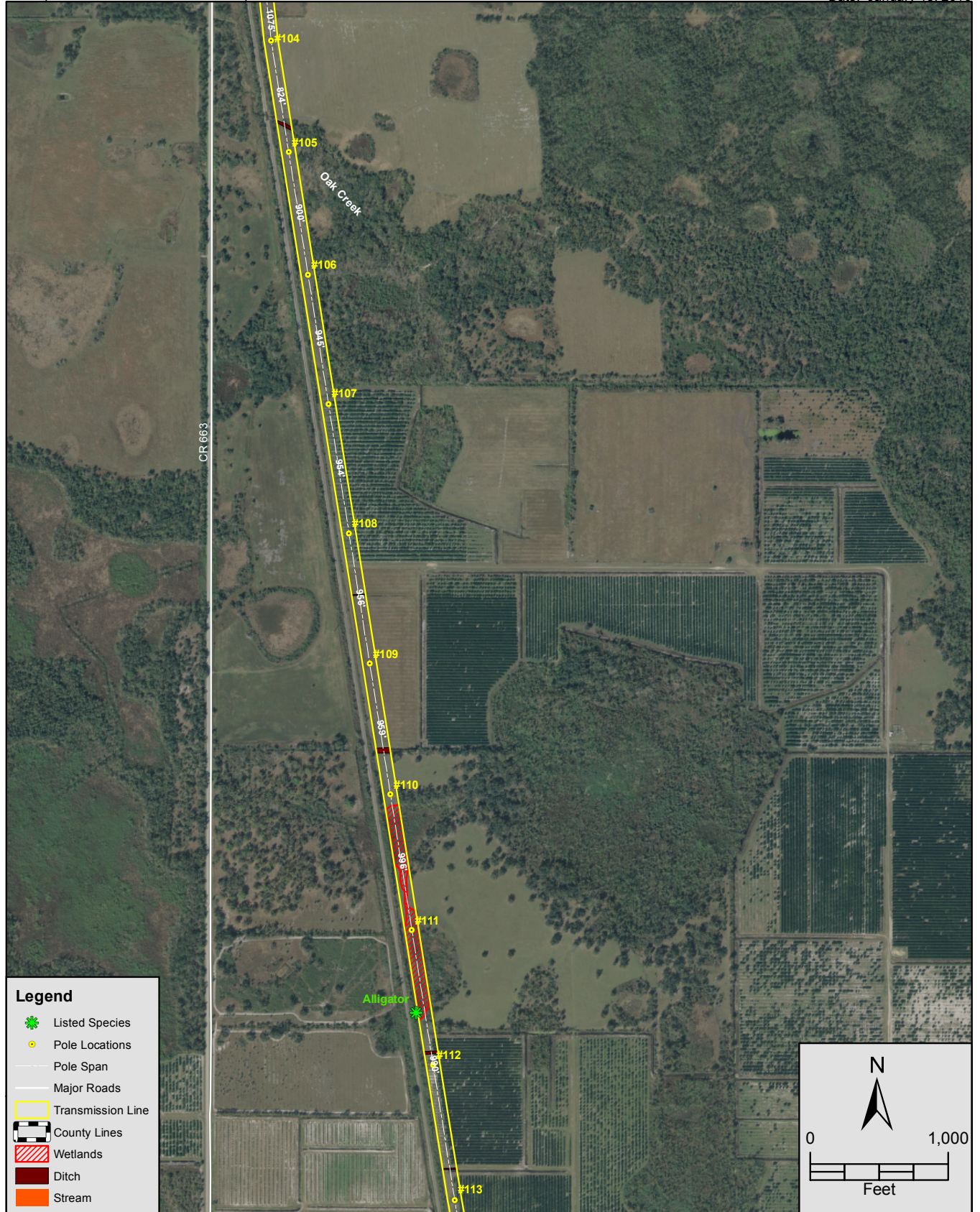
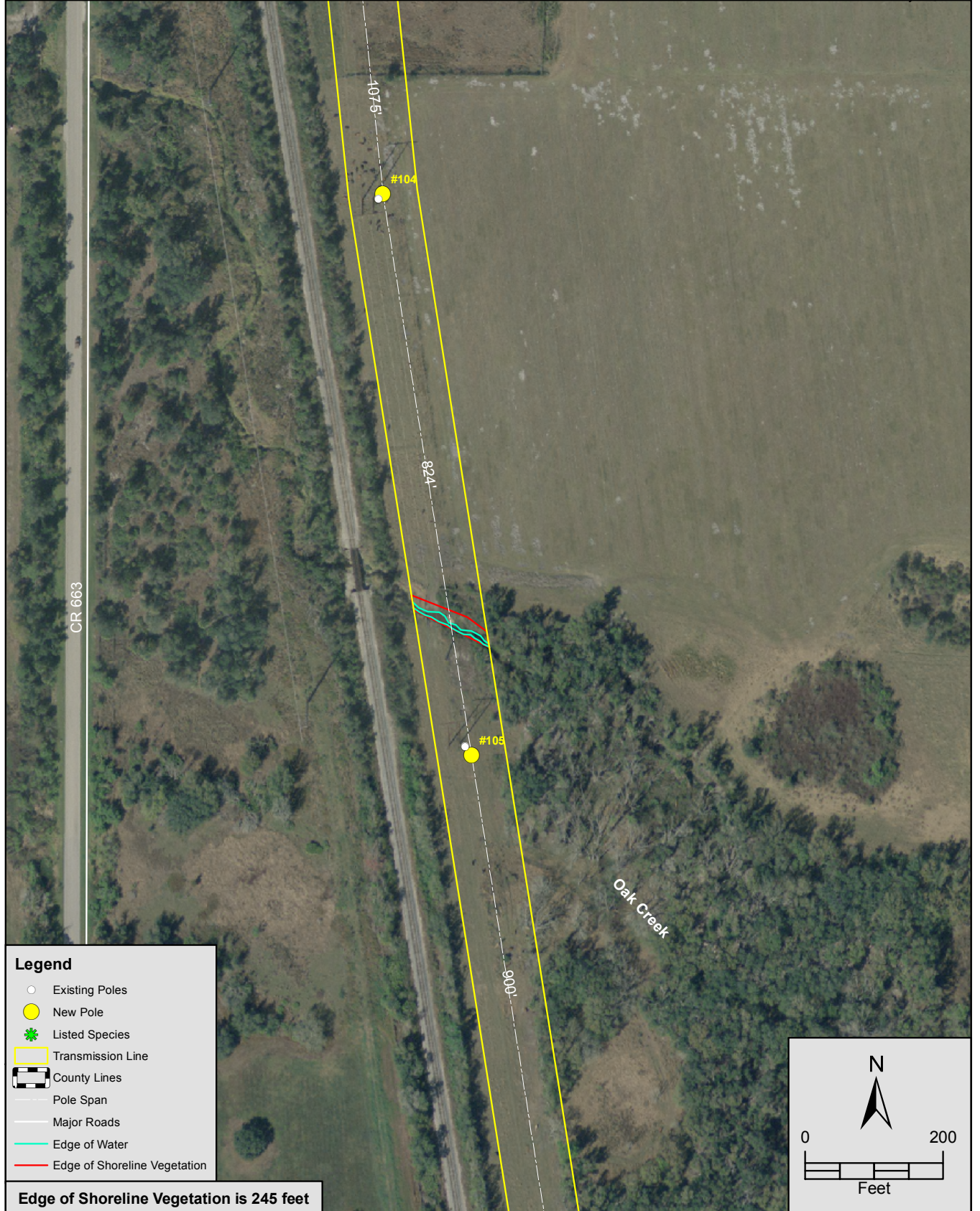


FIGURE 4 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 4 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 4A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

Seminole Electric
 COOPERATIVE, INC.
NEAR NEARSHIP WITH THOSE WE SERVE

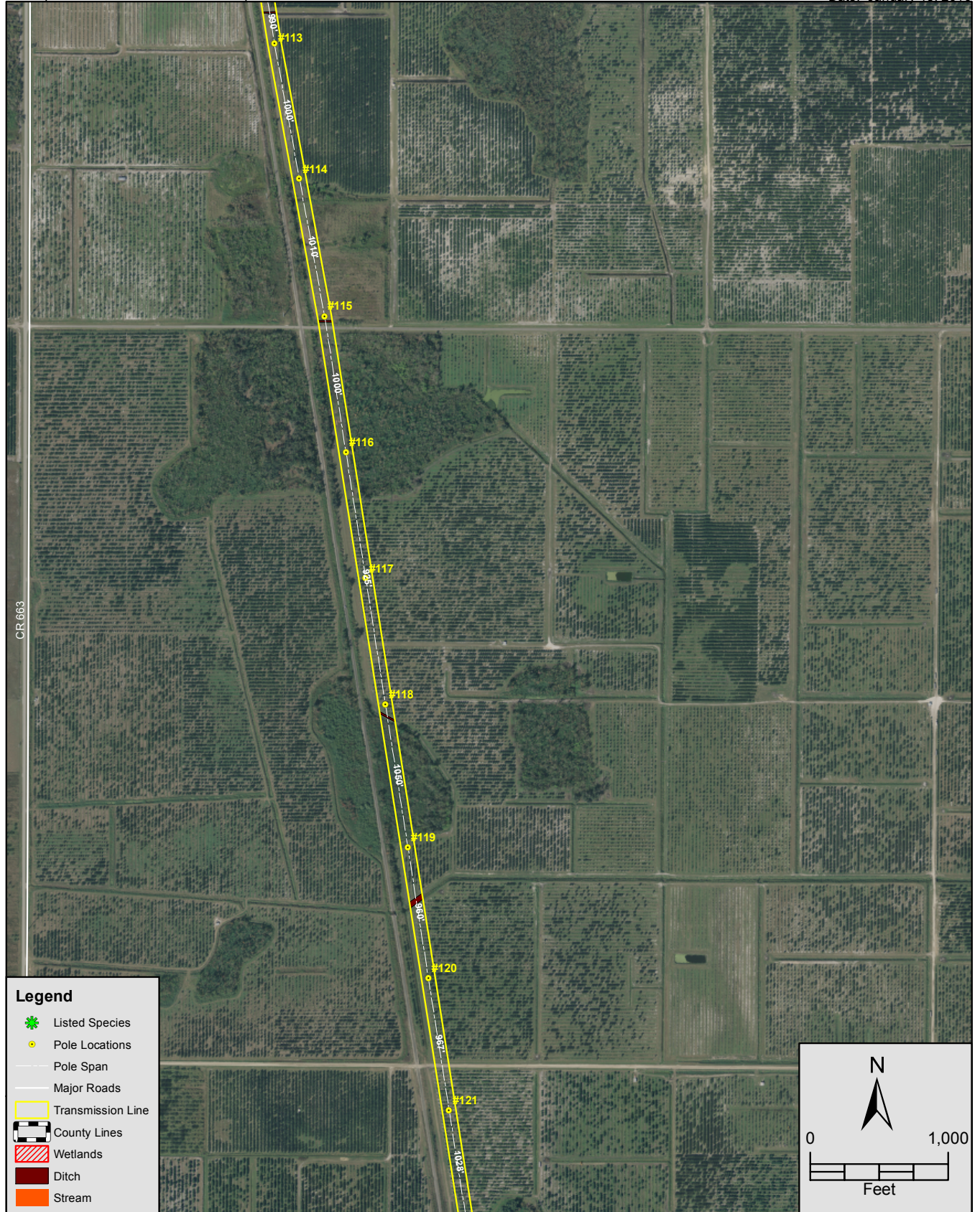


FIGURE 5 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 5 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

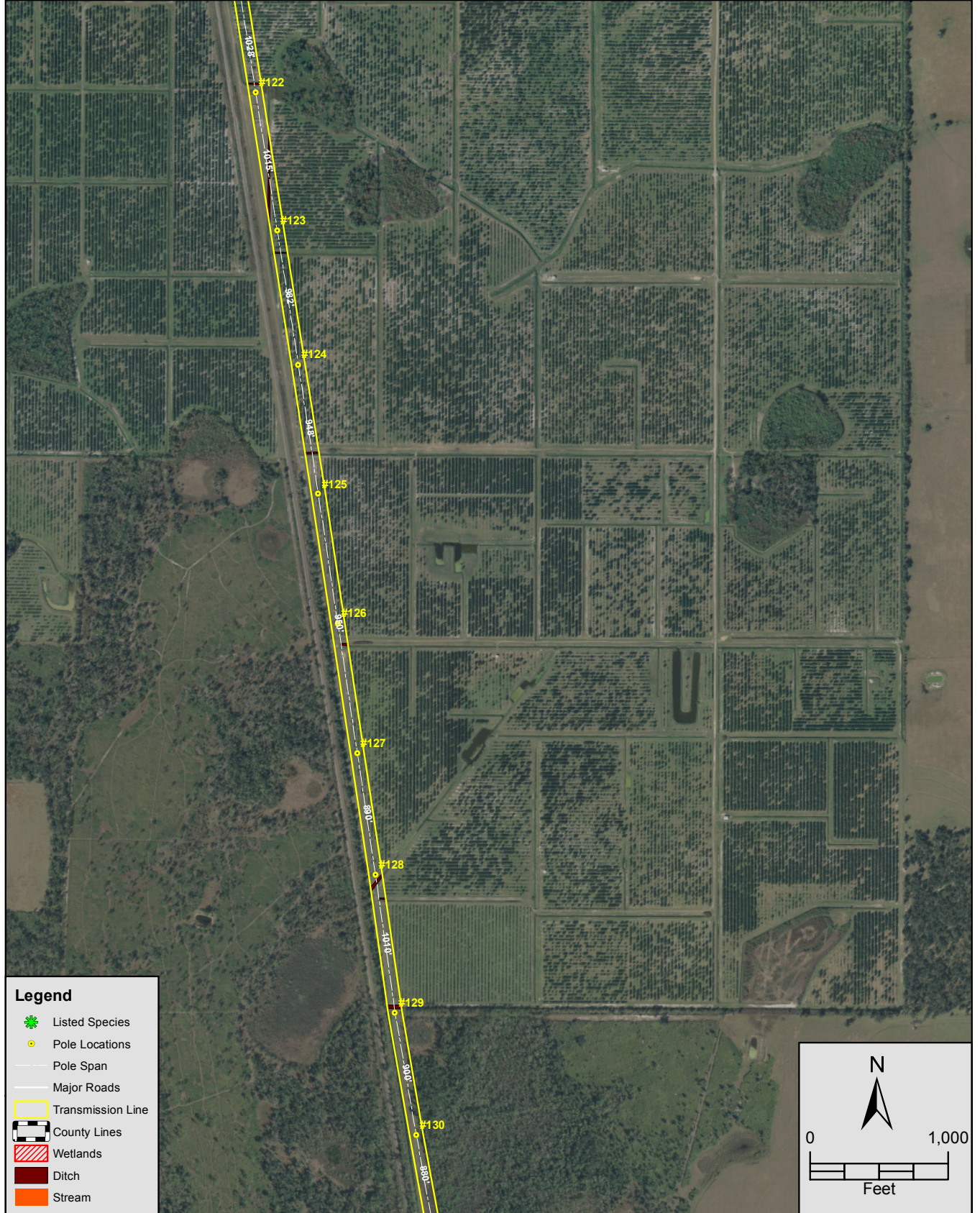
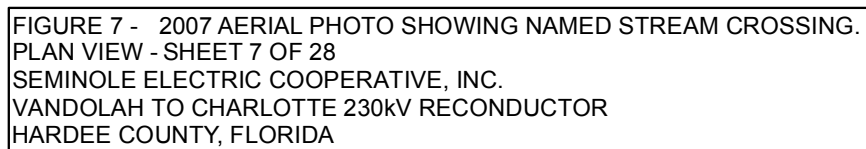


FIGURE 6 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 6 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230kV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



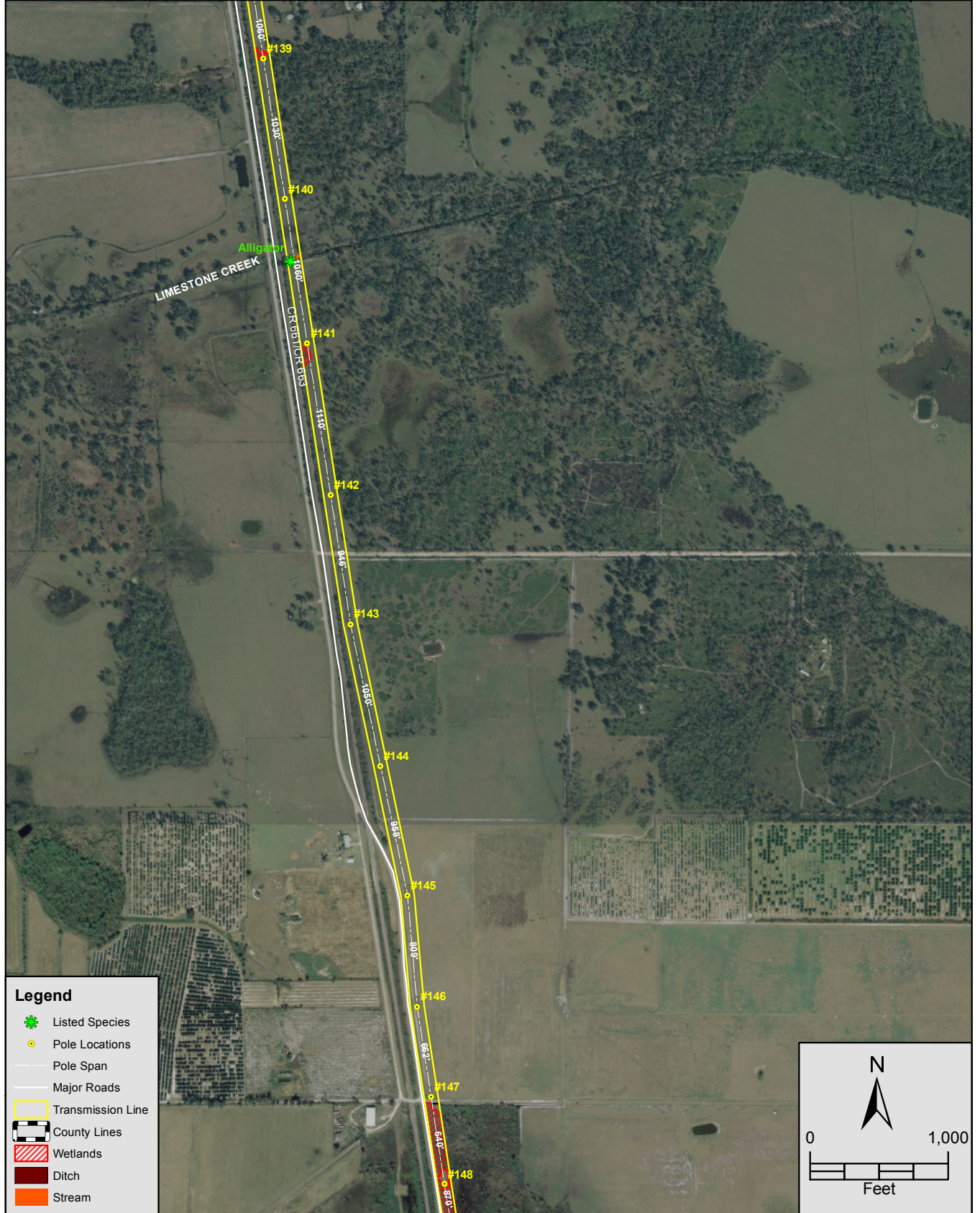
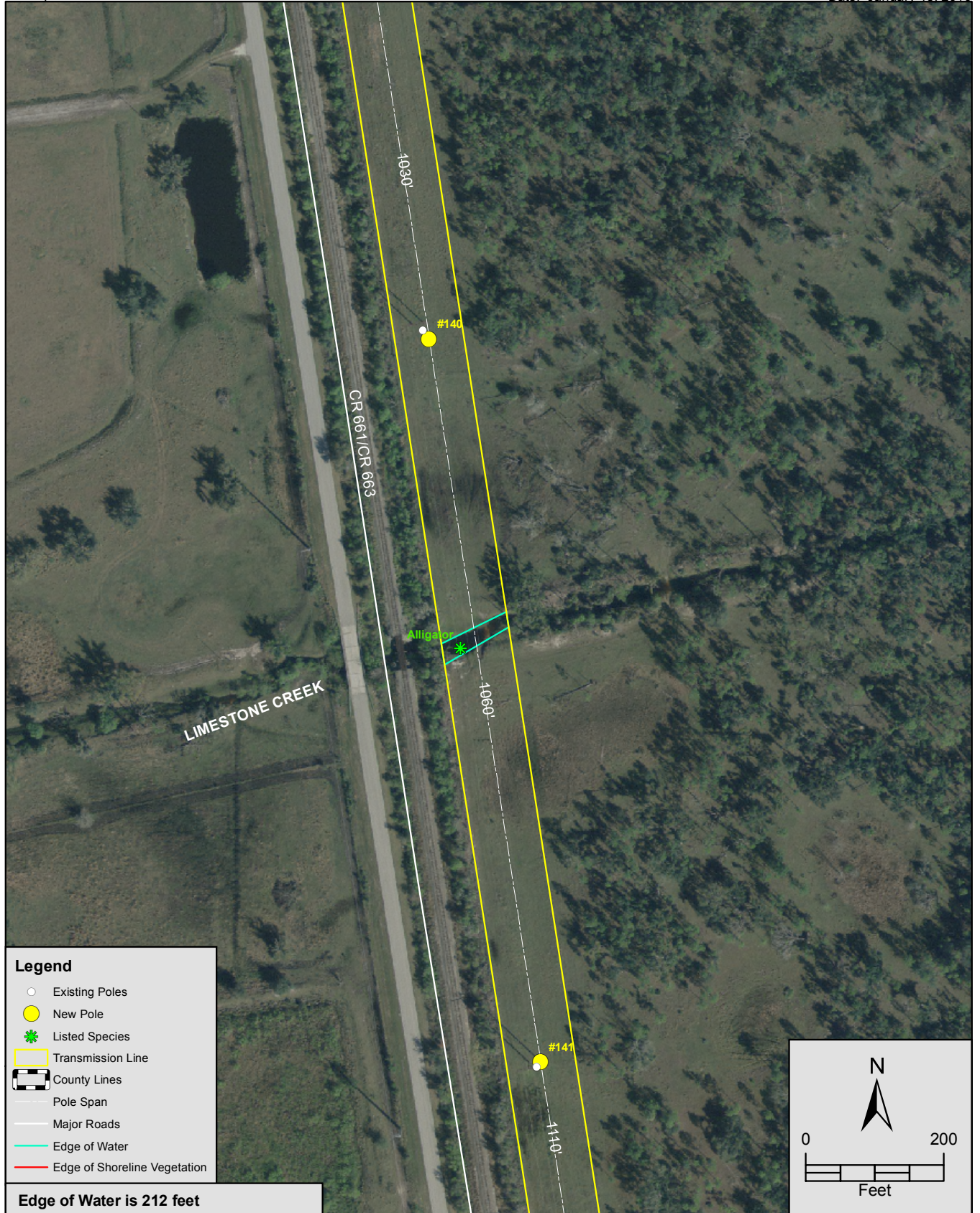


FIGURE 8 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 8 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

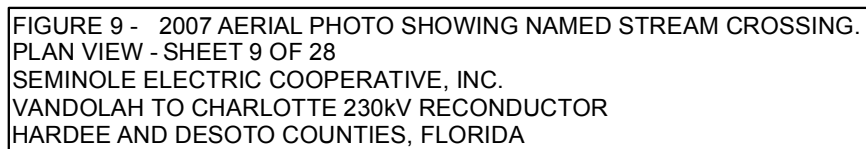
Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 8A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 HARDEE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.





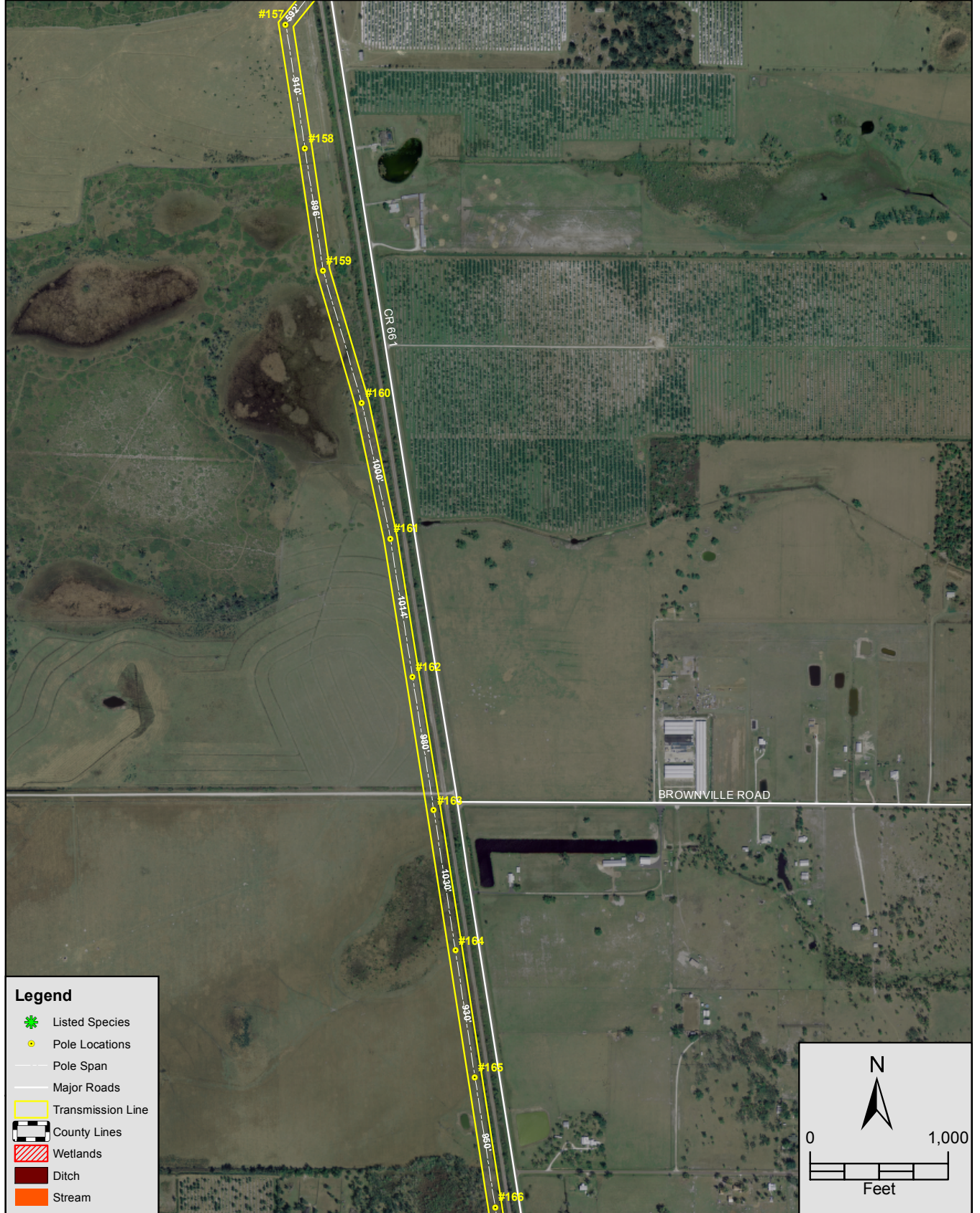


FIGURE 10 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 10 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

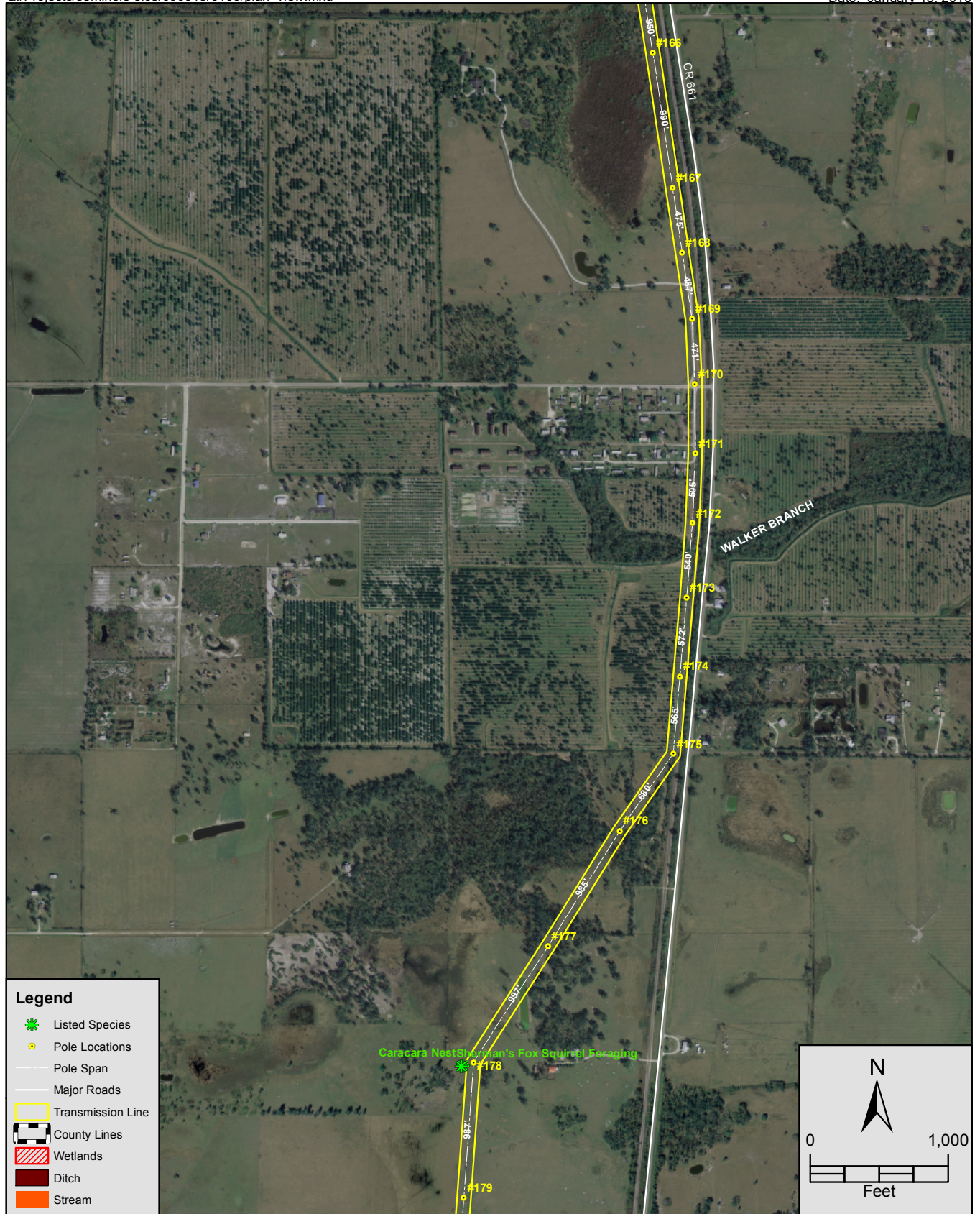
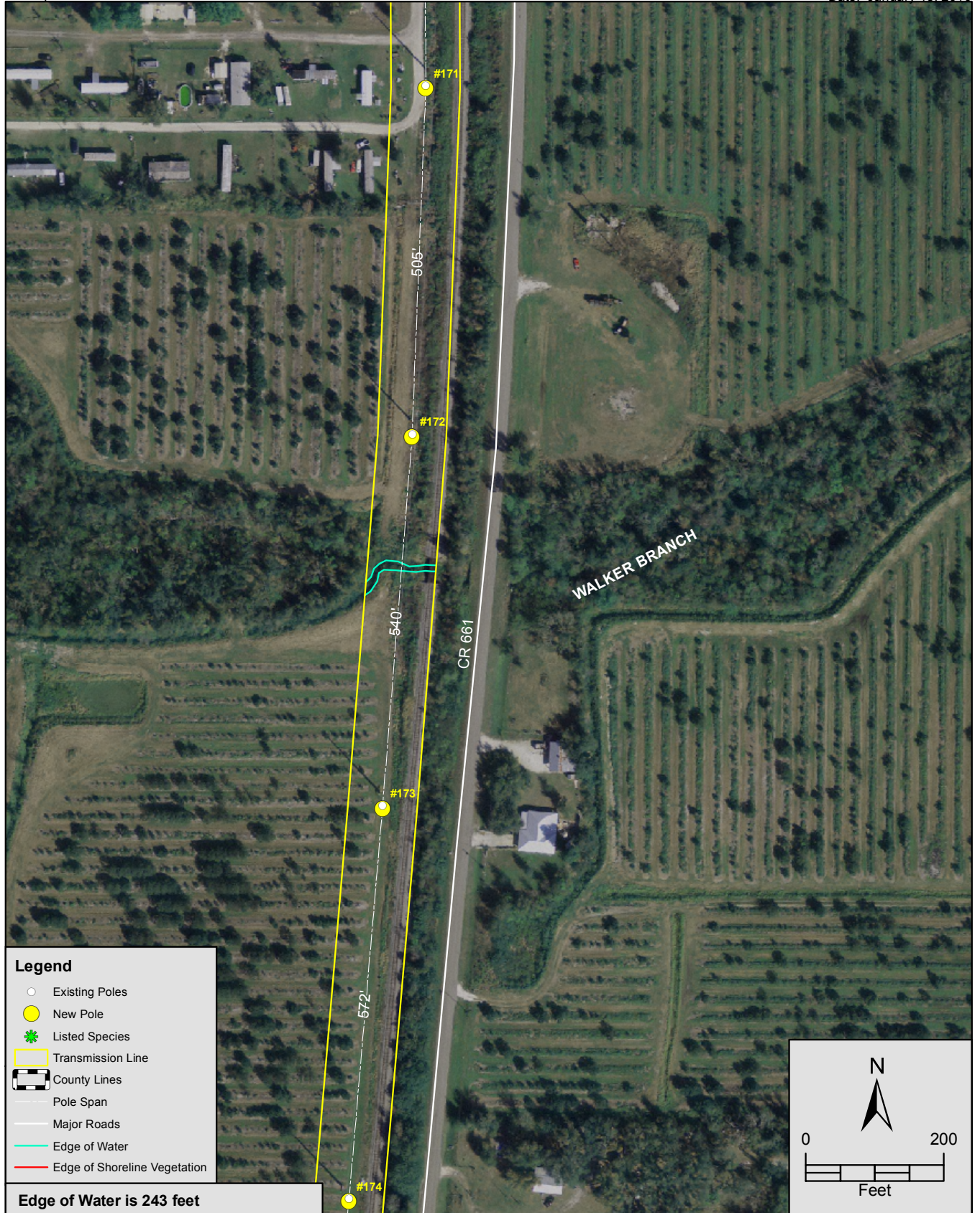


FIGURE 11 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 11 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 11A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

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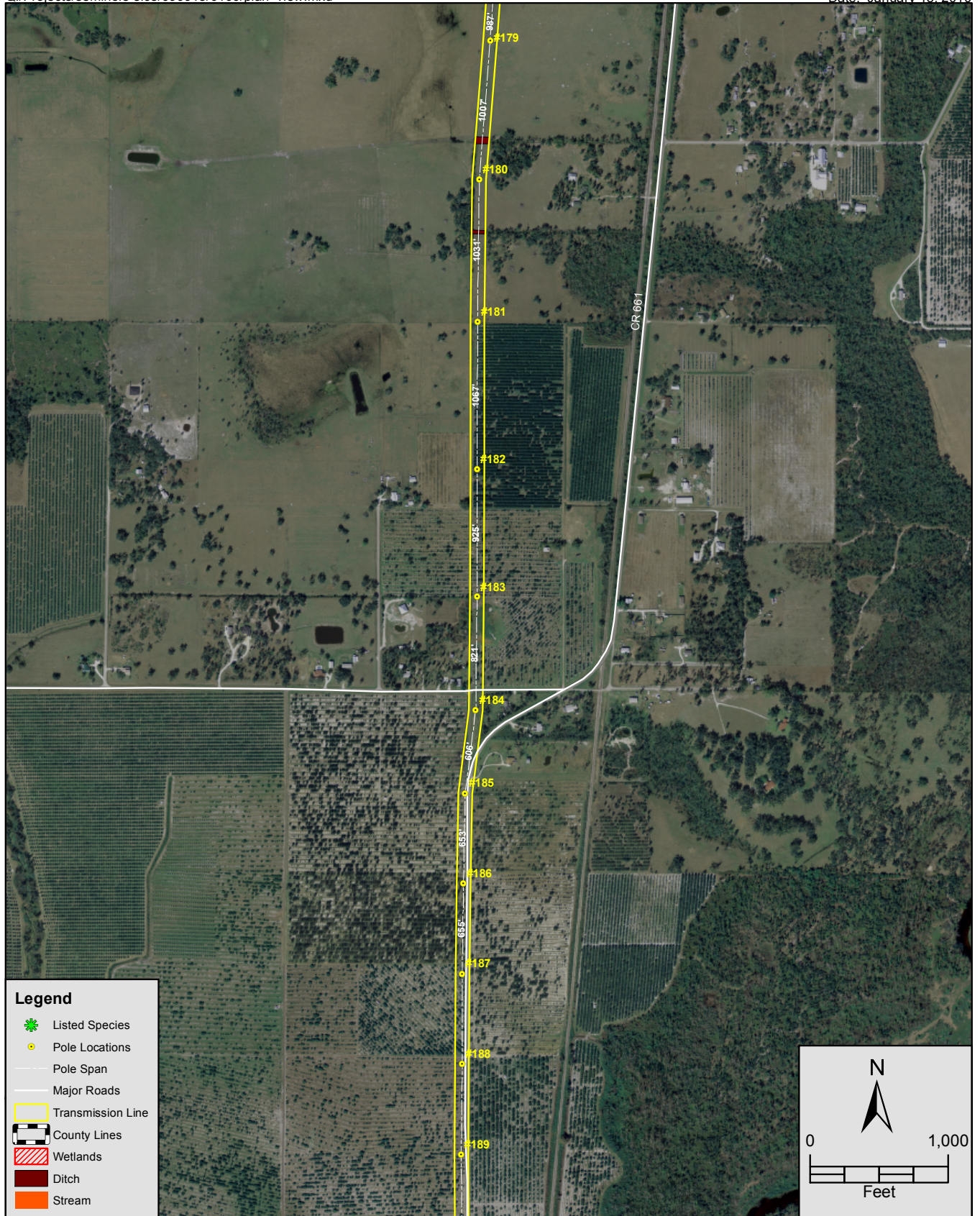


FIGURE 12 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 12 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

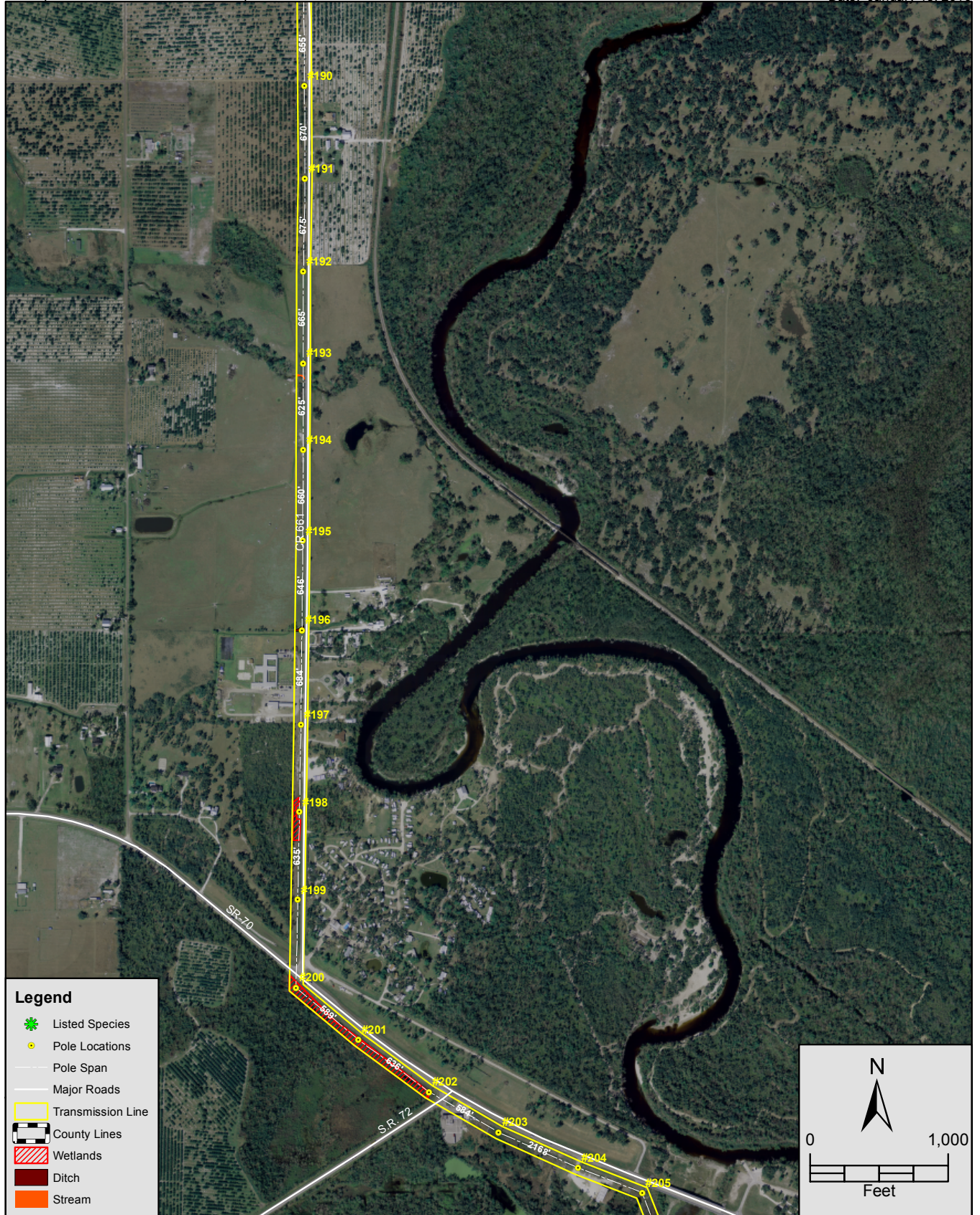


FIGURE 13 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 13 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

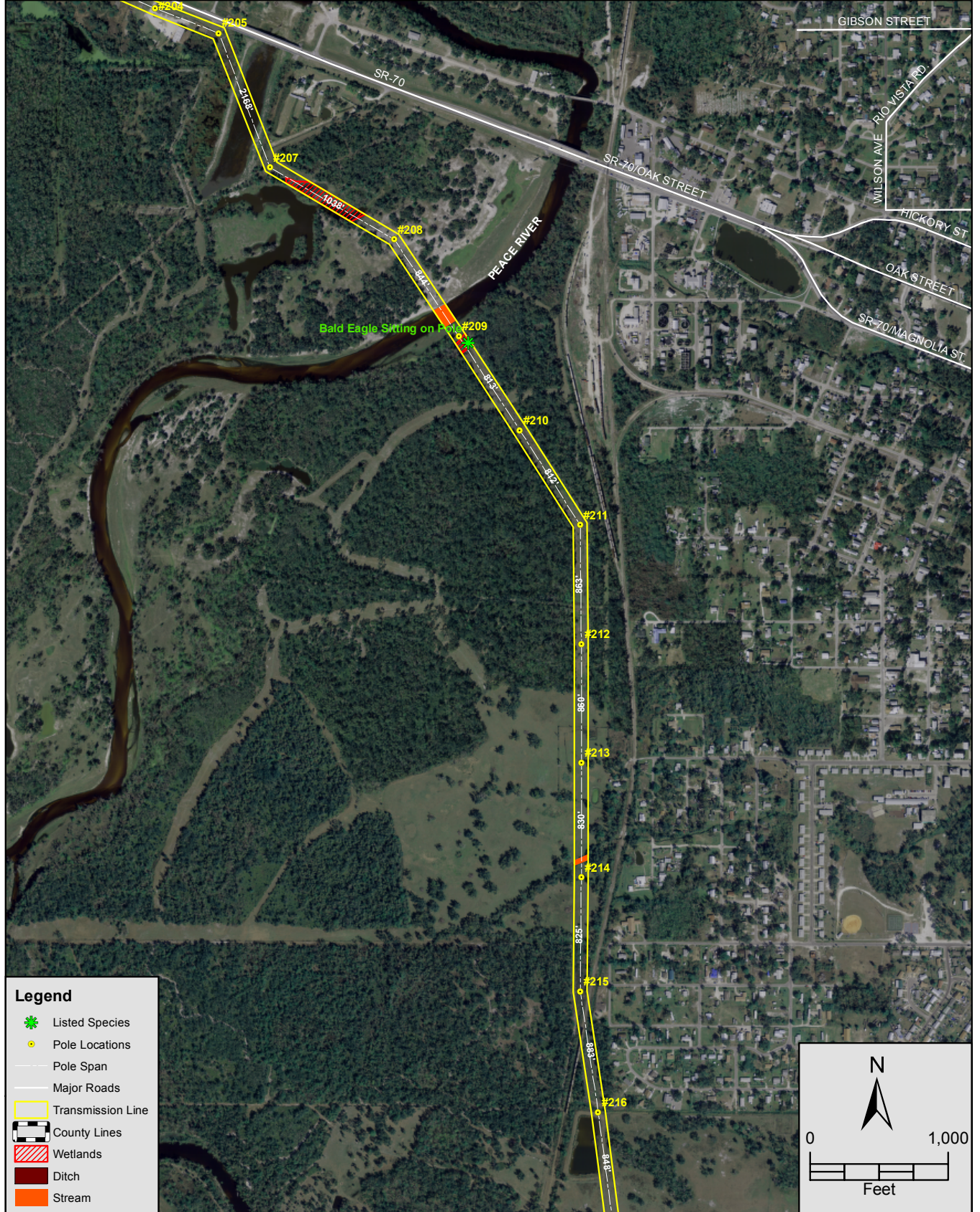
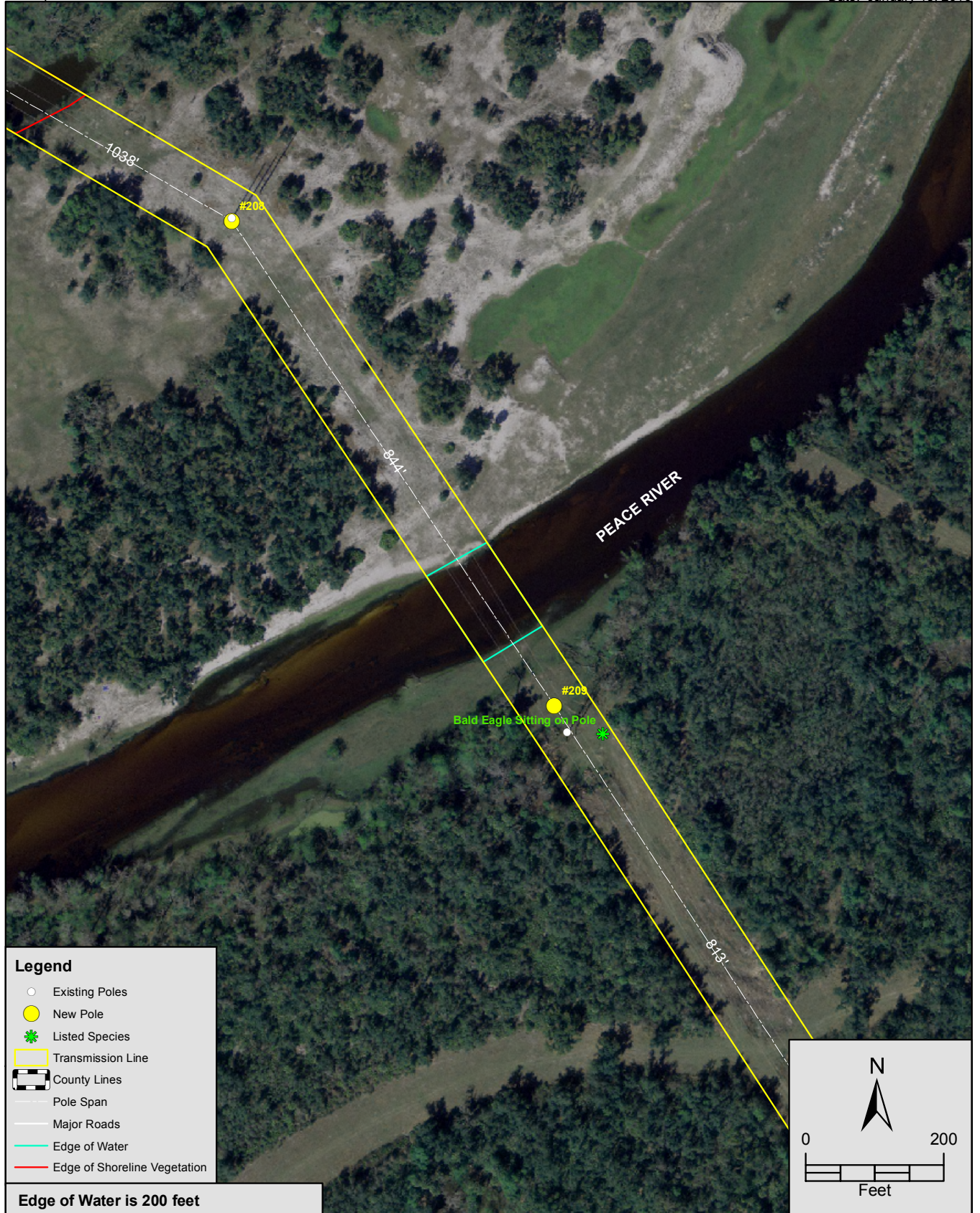


FIGURE 14 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 14 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 14A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



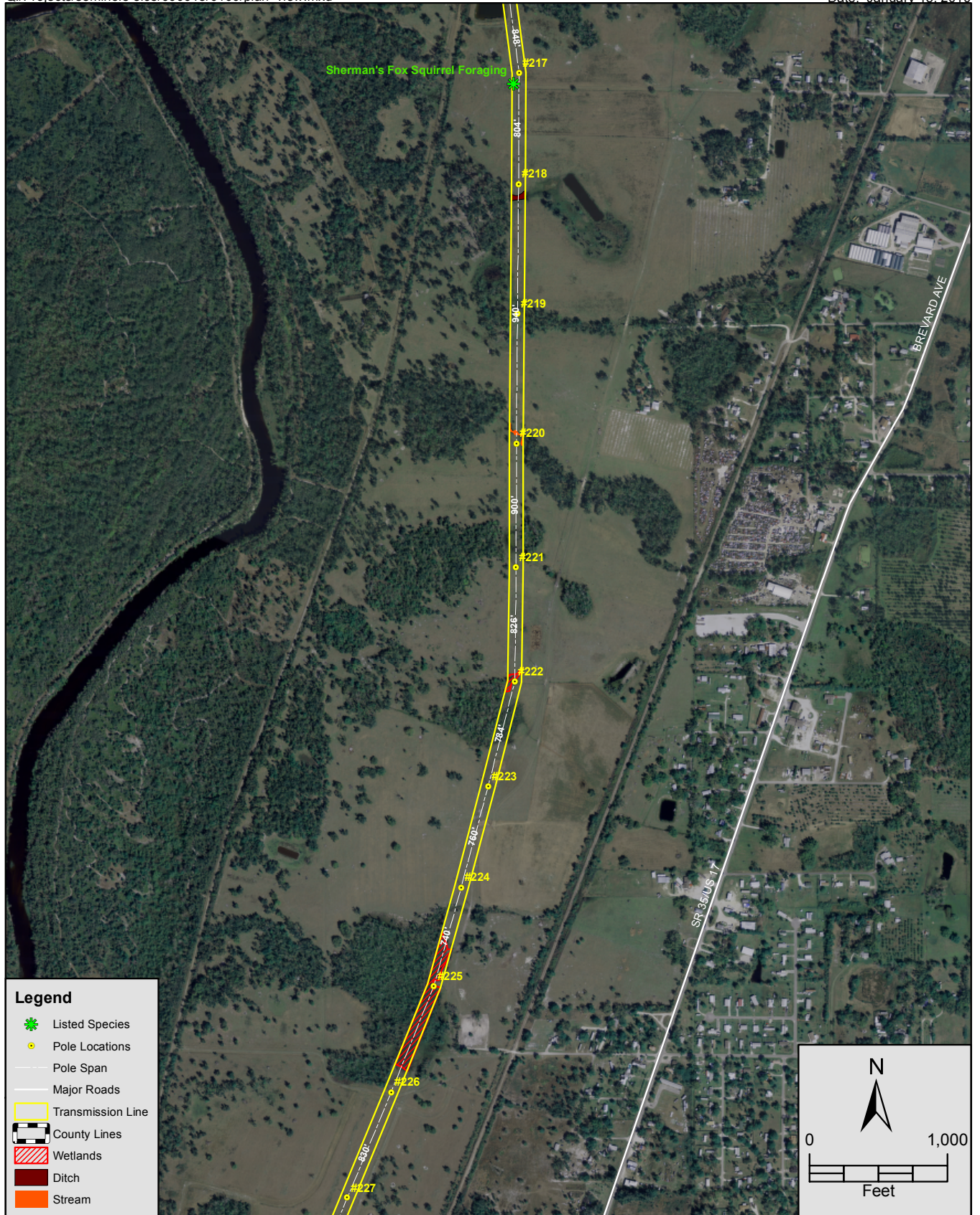


FIGURE 15 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 15 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

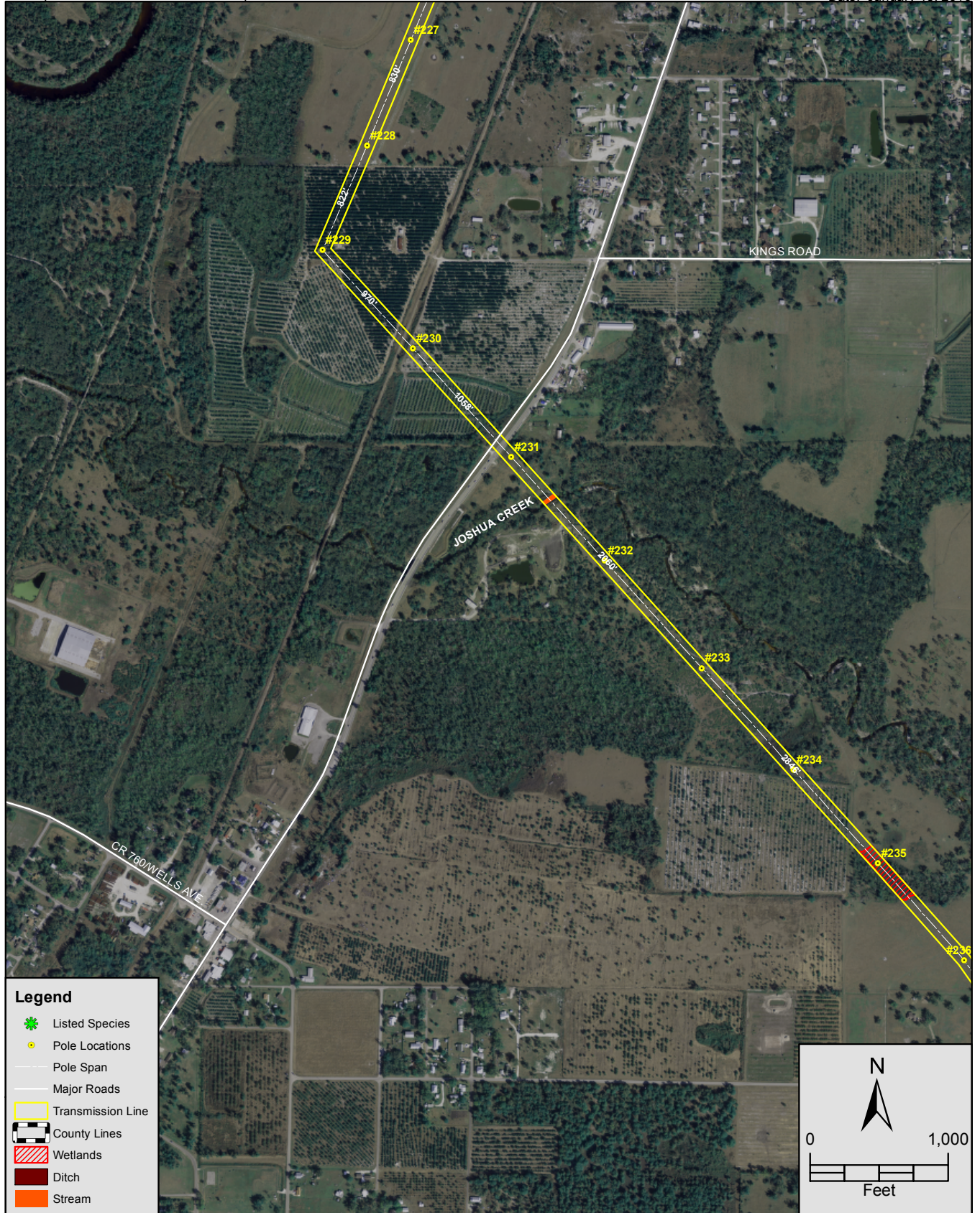
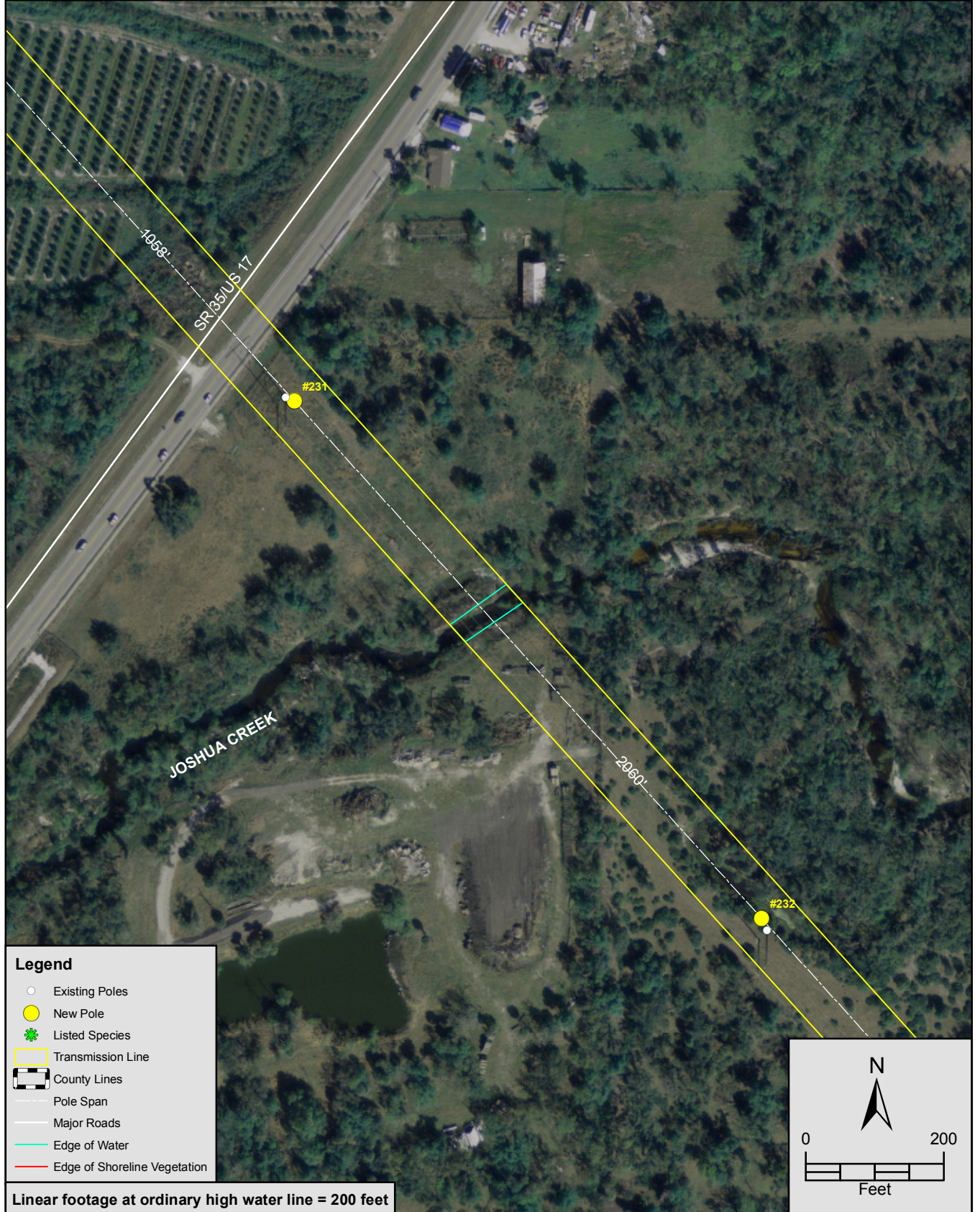


FIGURE 16 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 16 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 16A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

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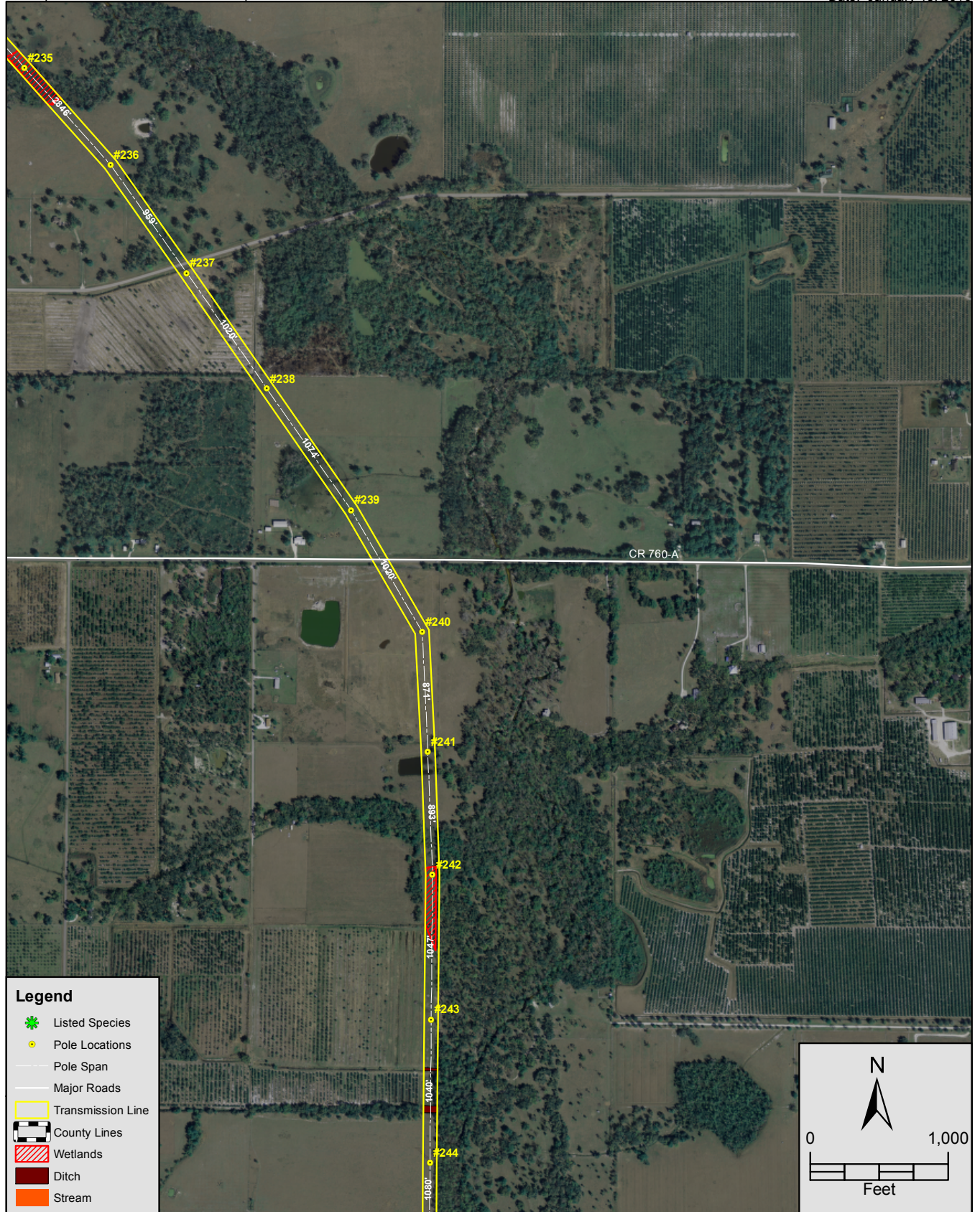


FIGURE 17 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 17 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

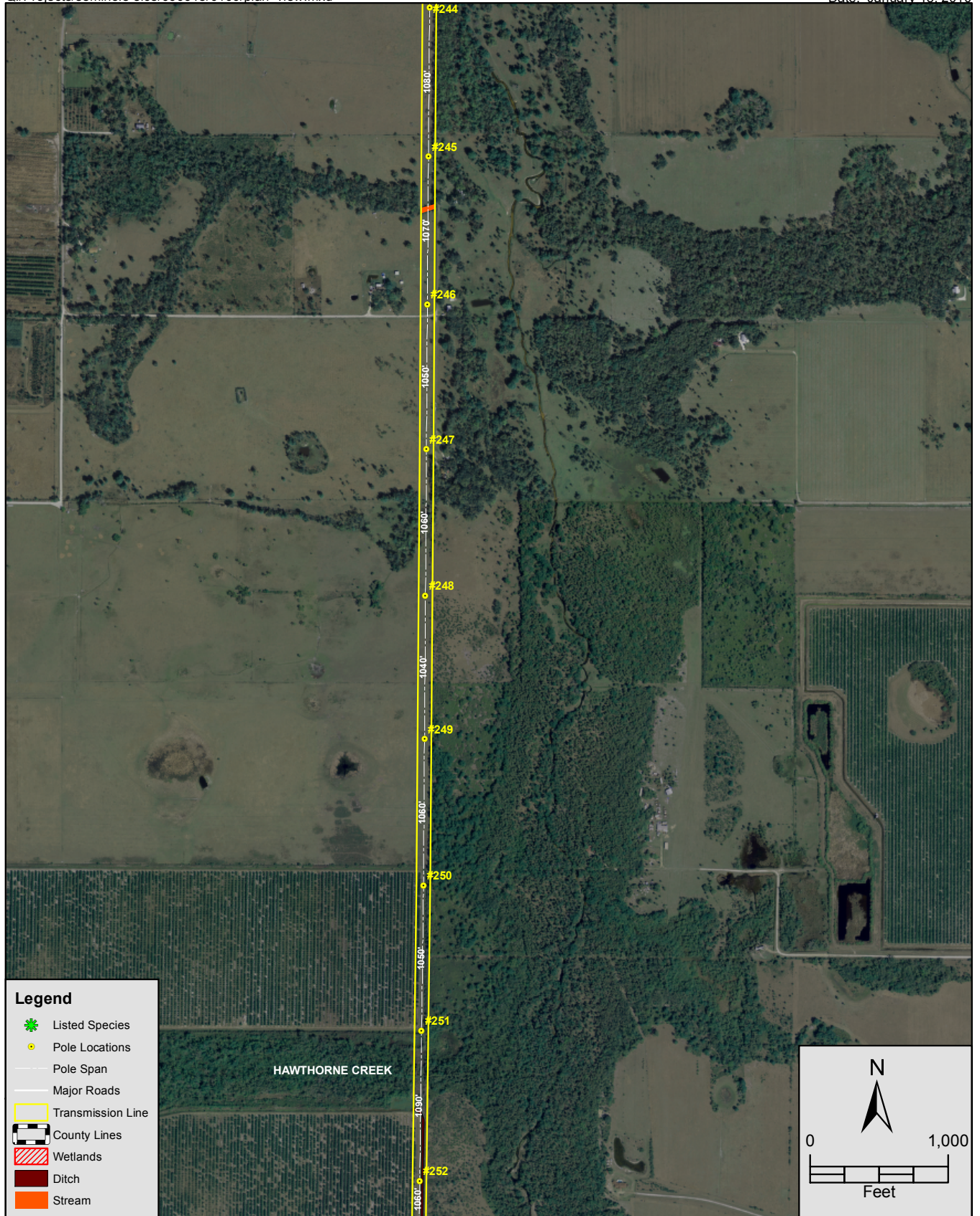
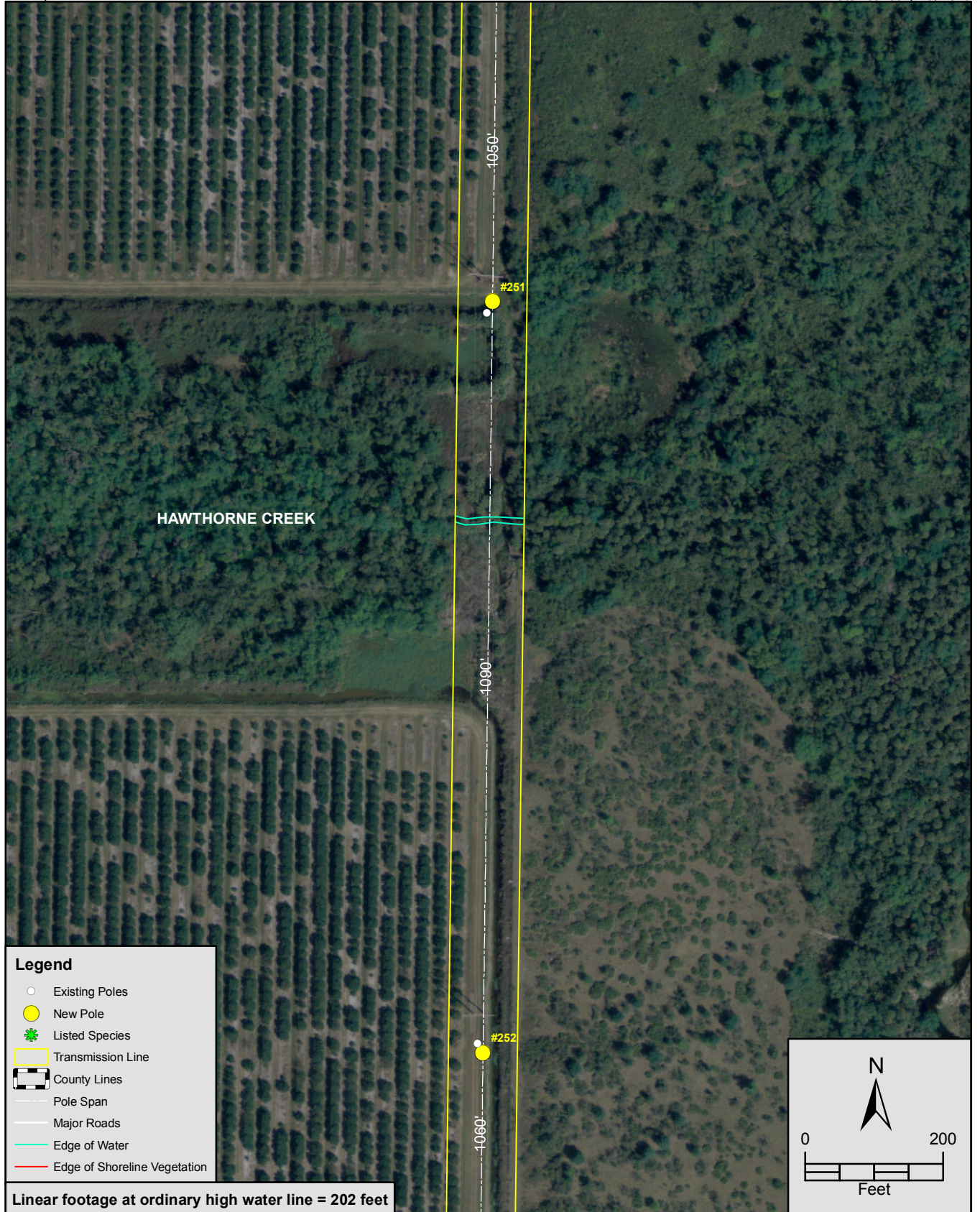


FIGURE 18 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 18 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 18A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



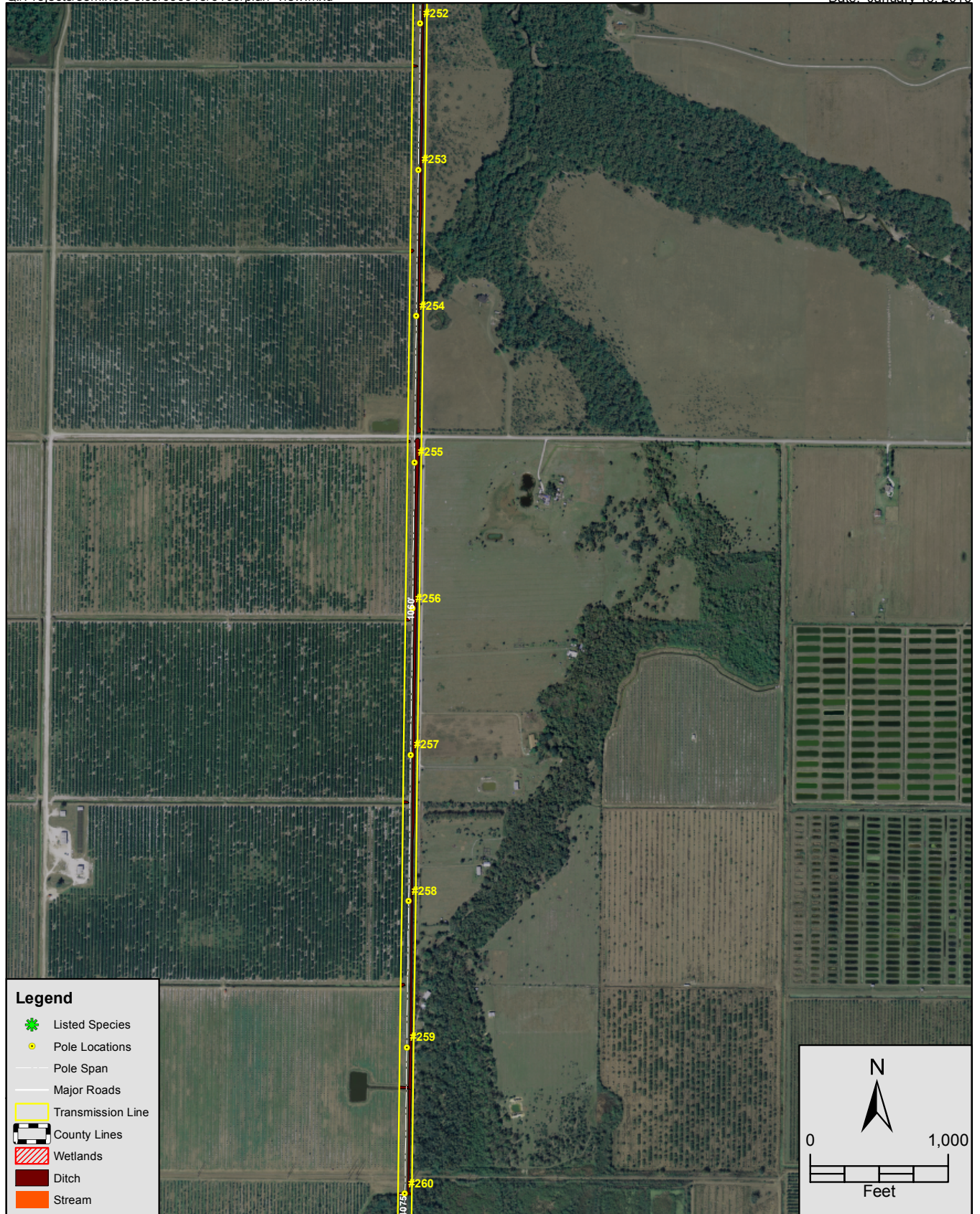


FIGURE 19 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 19 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

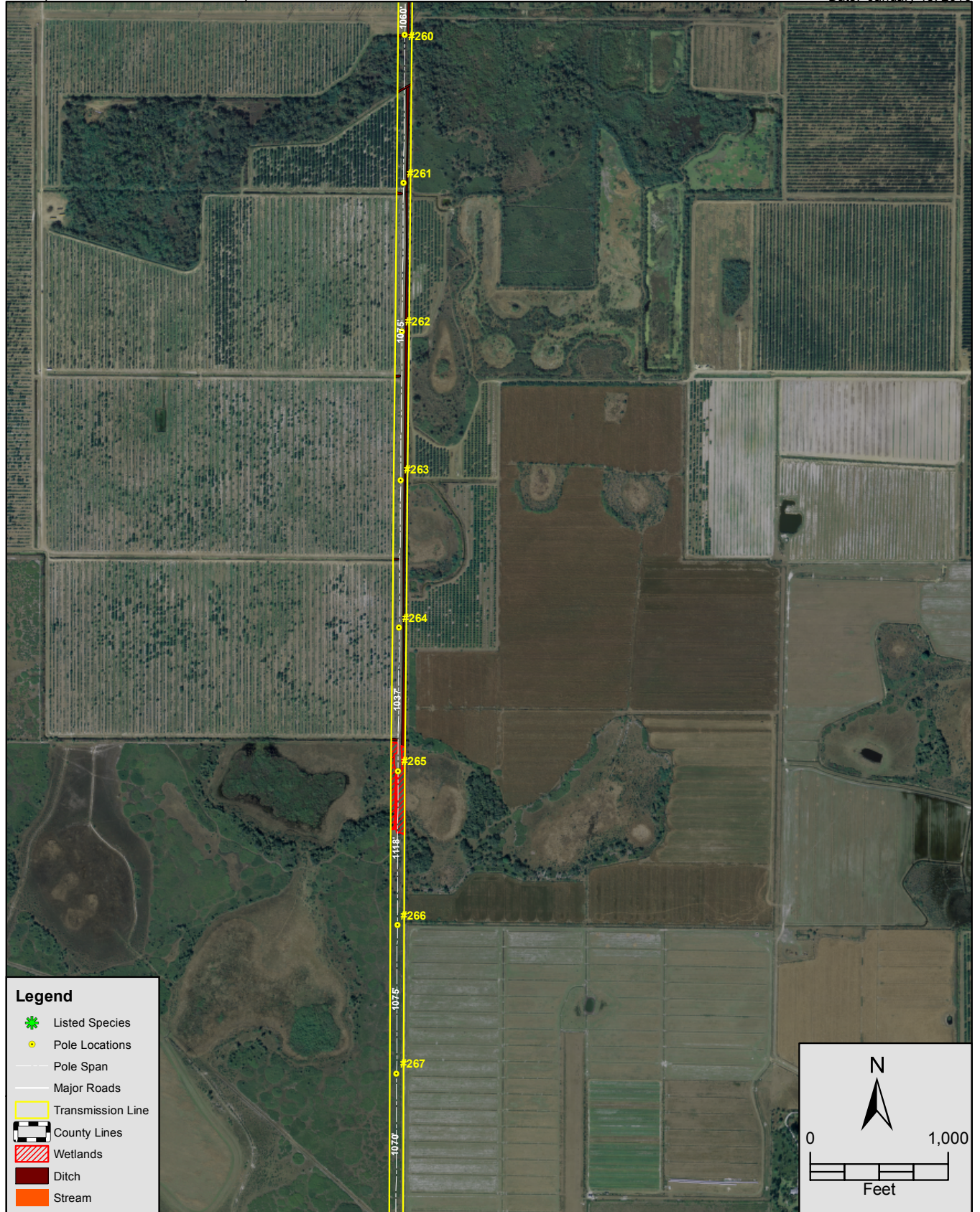


FIGURE 20 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 20 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

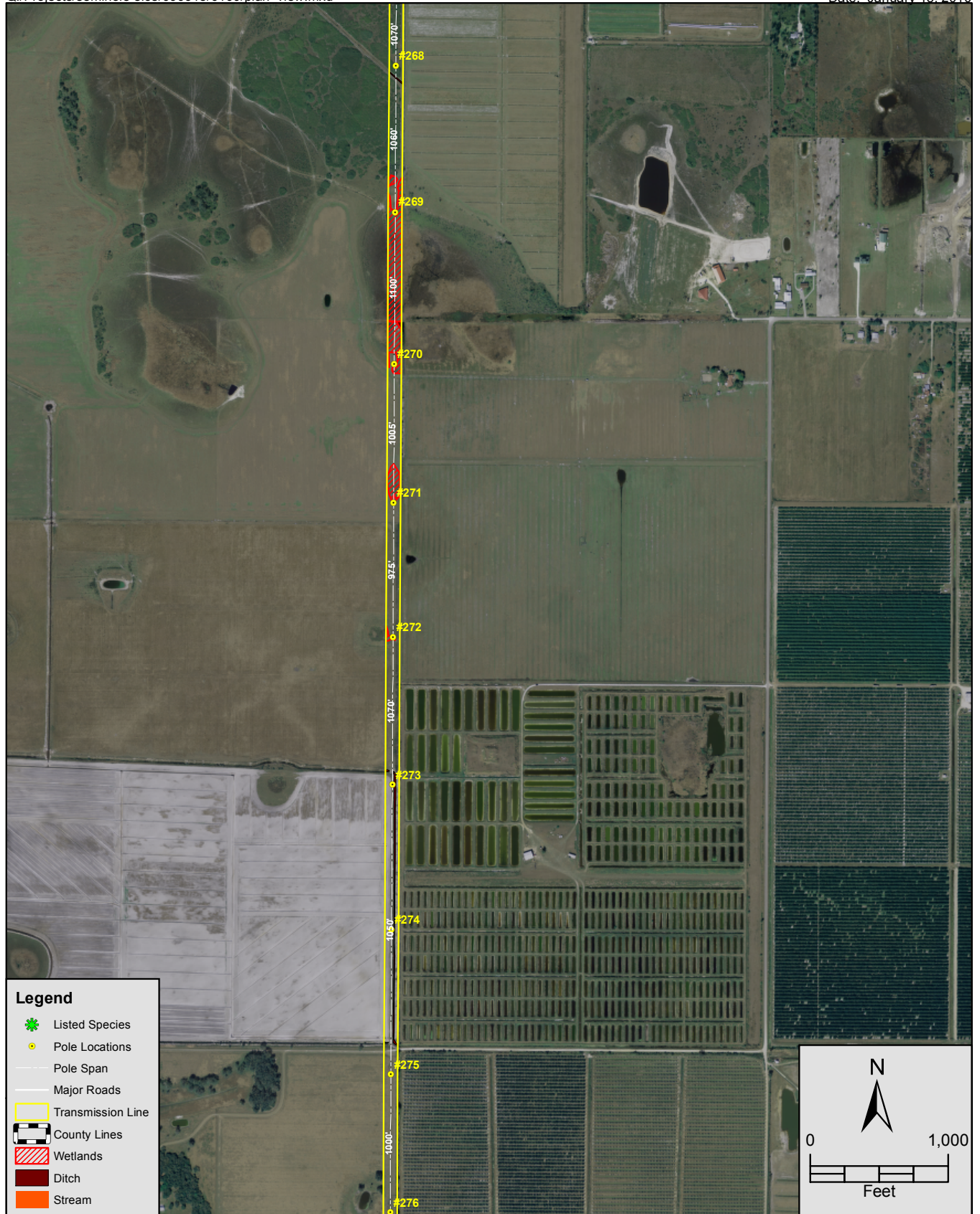


FIGURE 21 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 21 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

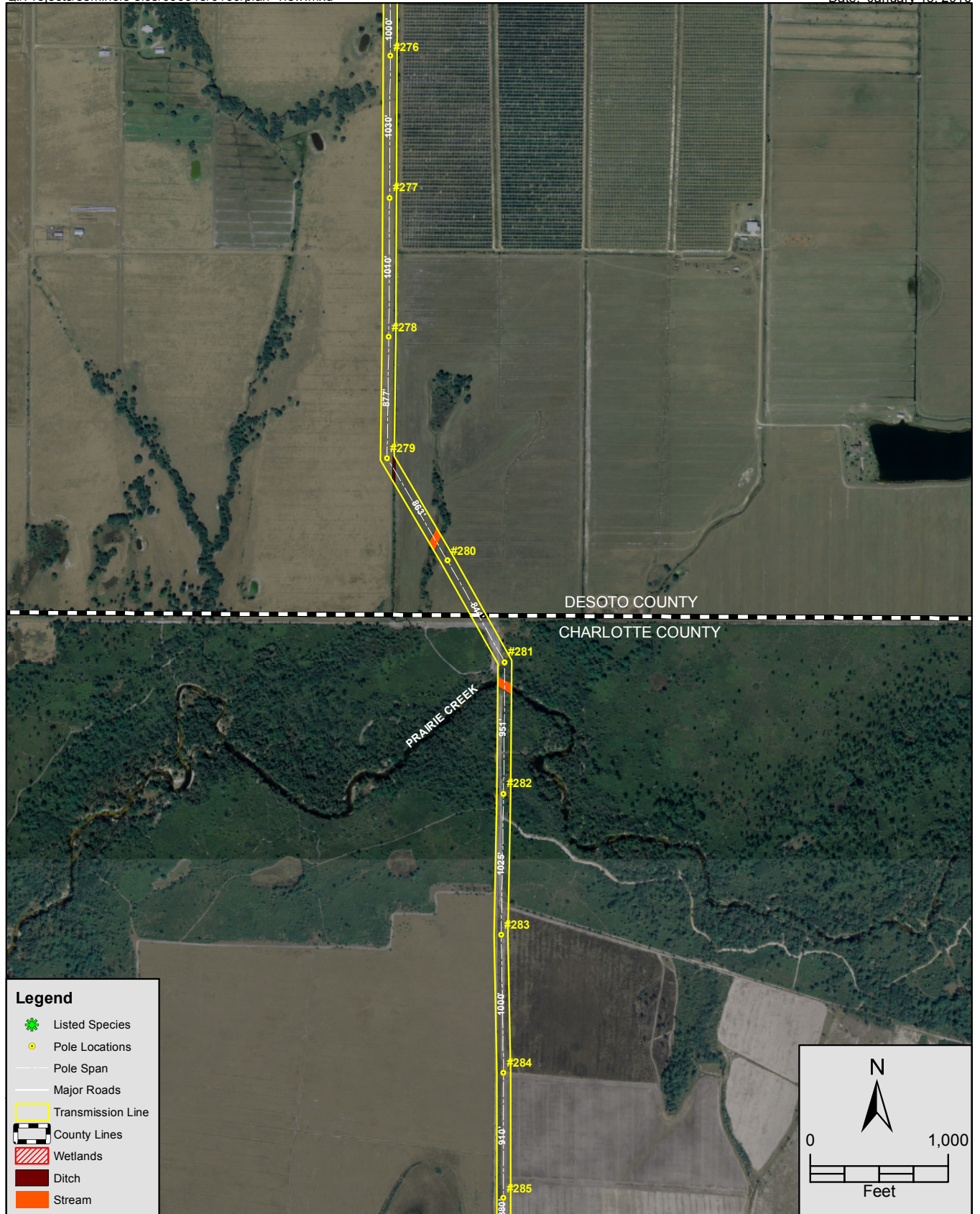
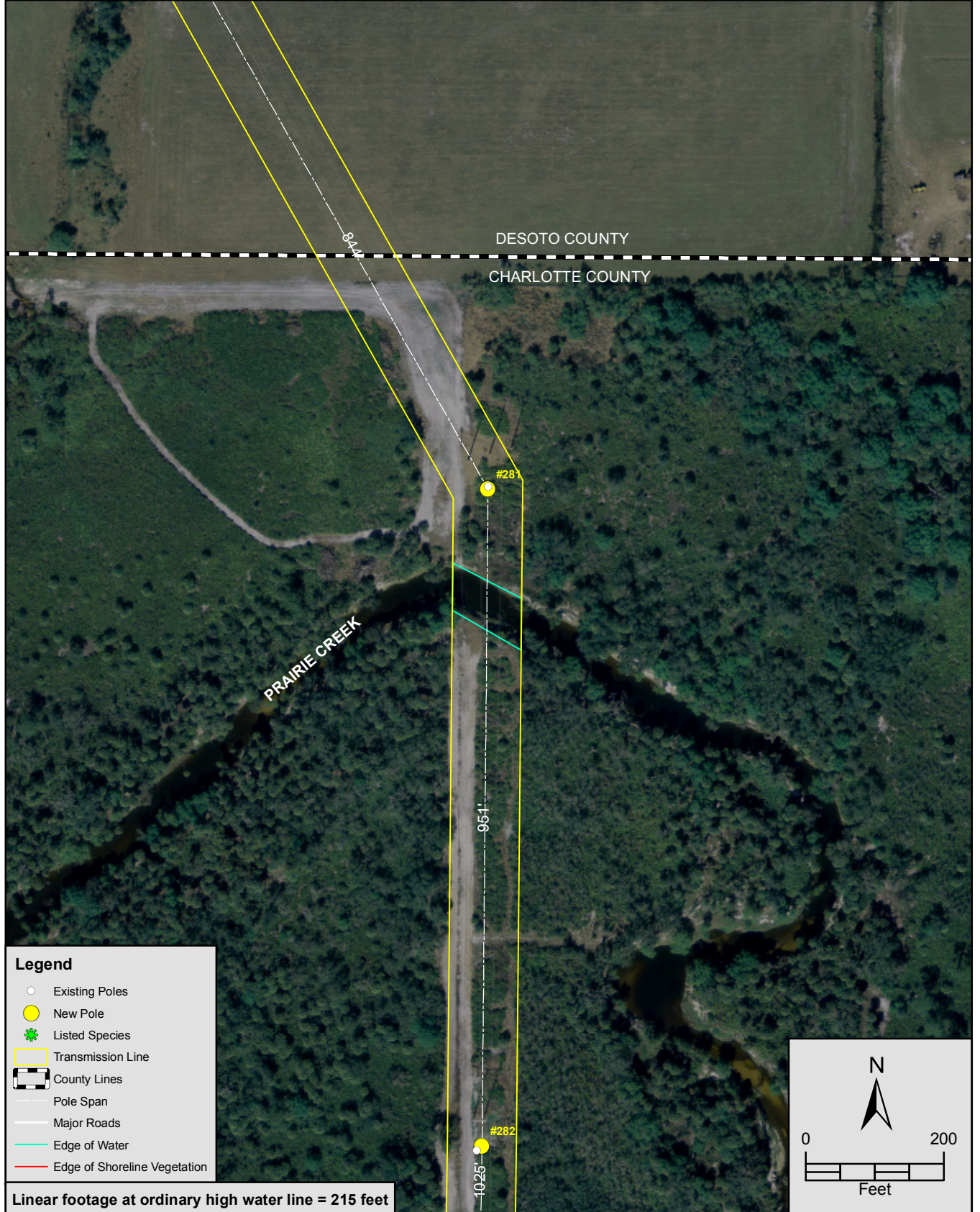


FIGURE 22 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 22 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO AND CHARLOTTE COUNTIES, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 22A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 DESOTO AND CHARLOTTE COUNTIES, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

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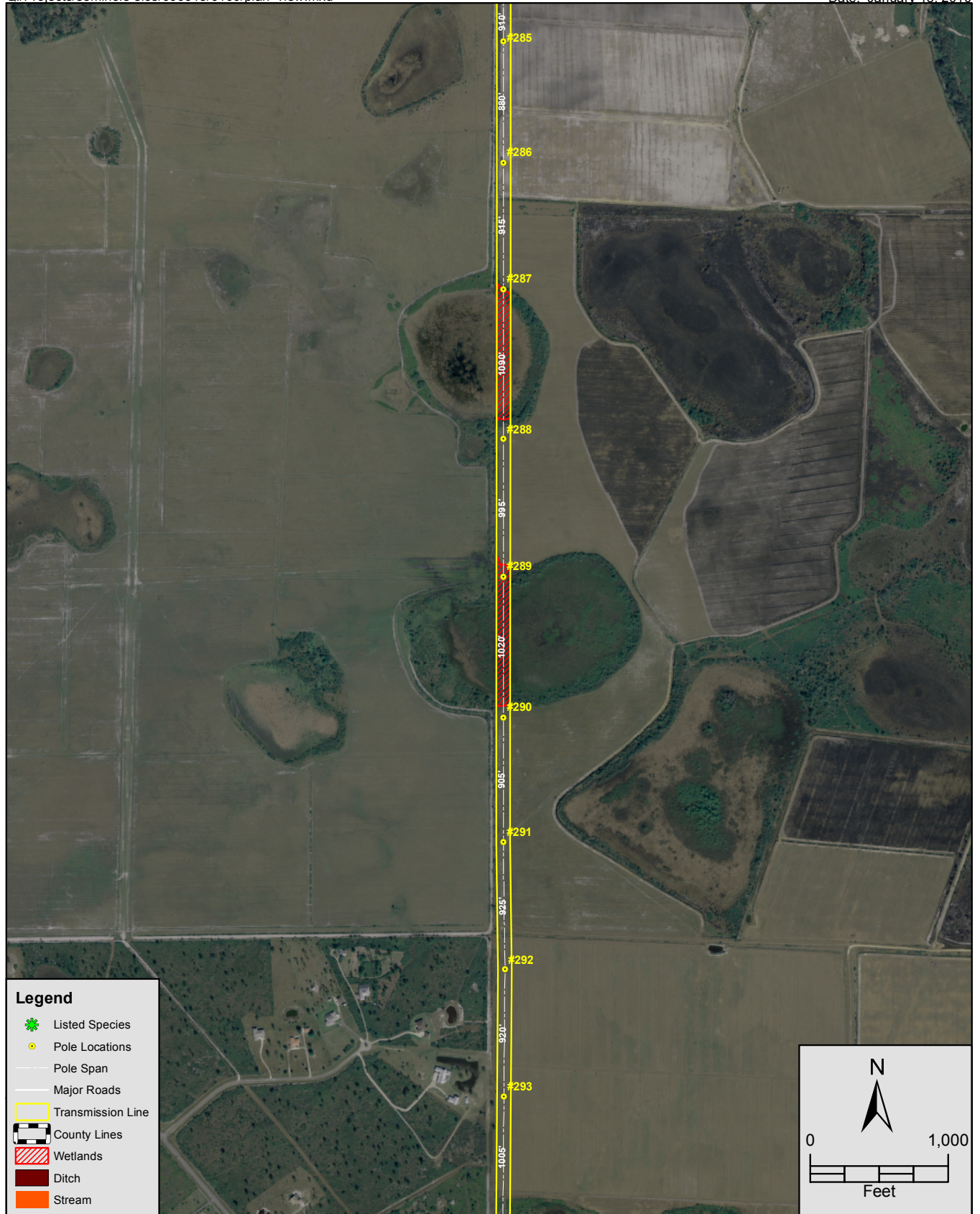


FIGURE 23 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 23 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

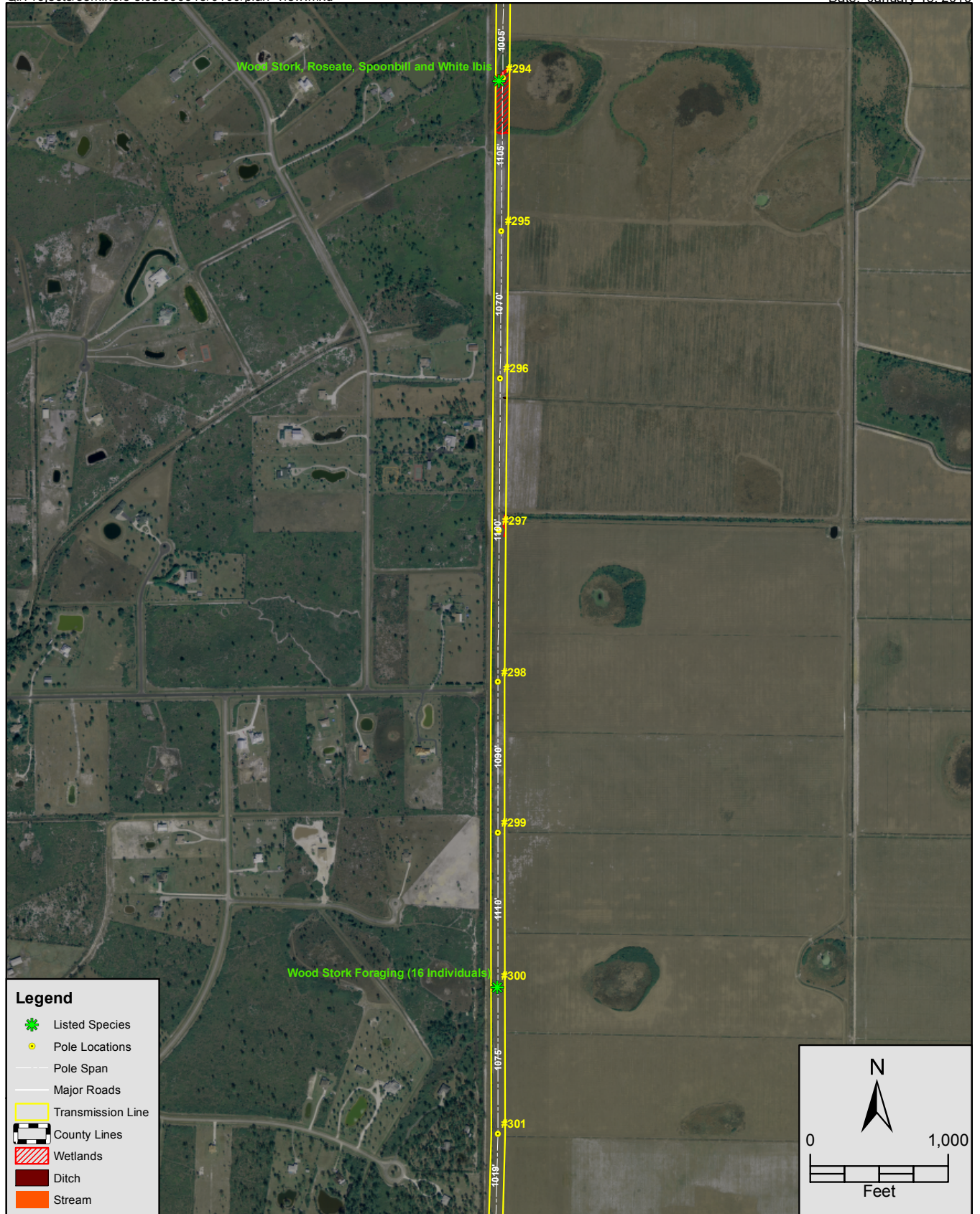


FIGURE 24 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 24 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

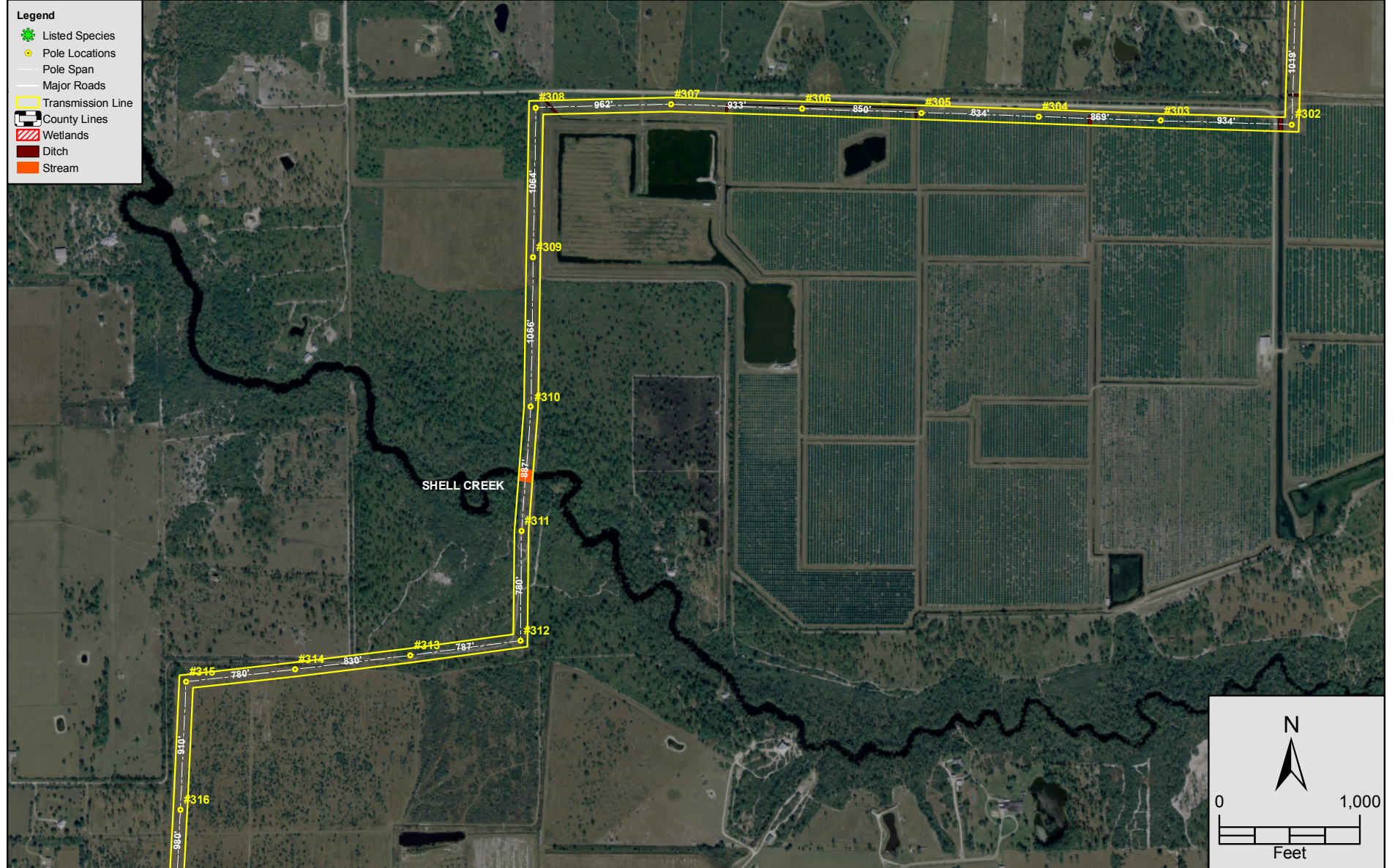
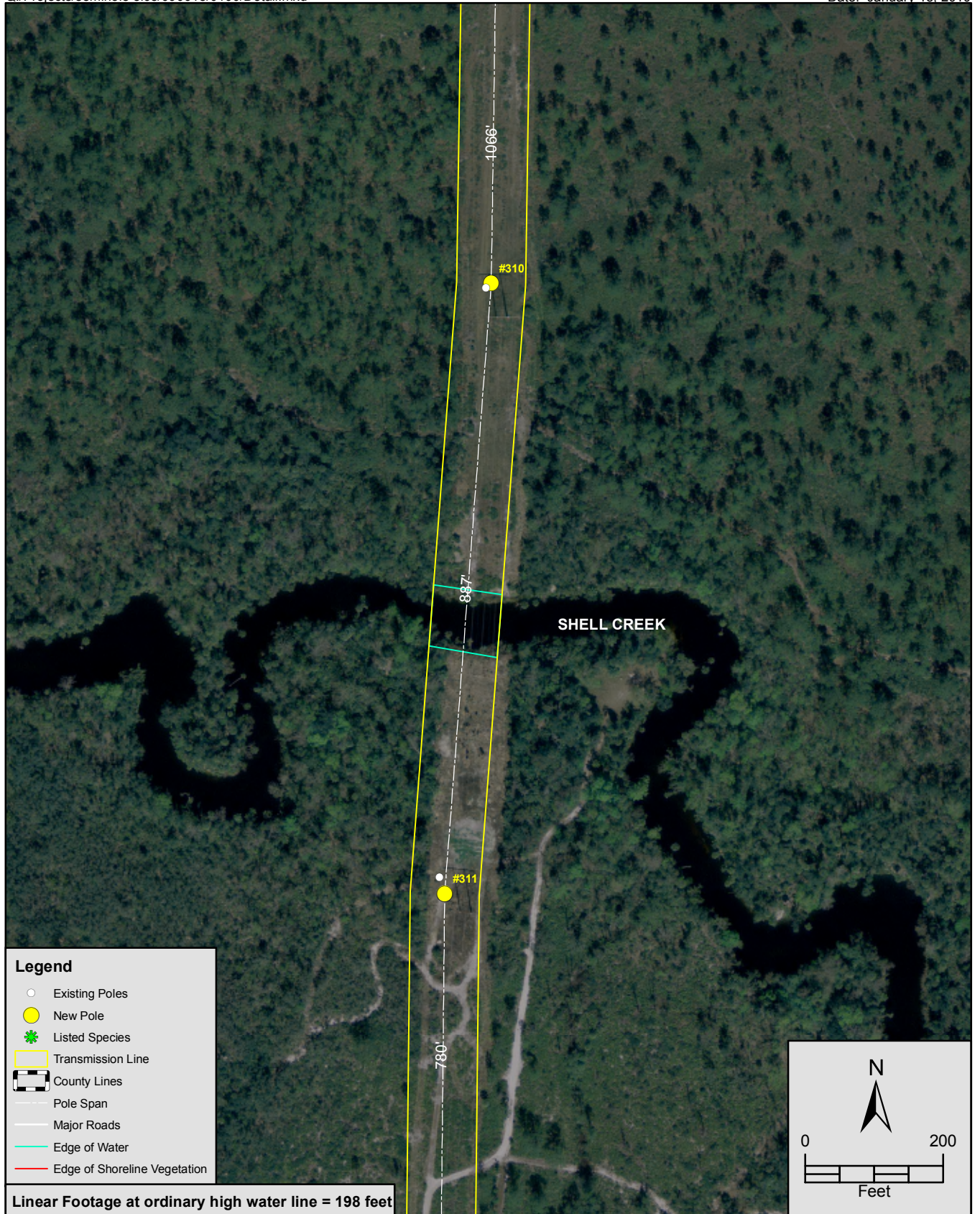


FIGURE 25 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 25 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA
 Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 25A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

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 COOPERATIVE, INC.
MEMBERSHIP WITH THE FLORIDA POWER & LIGHT COMPANY

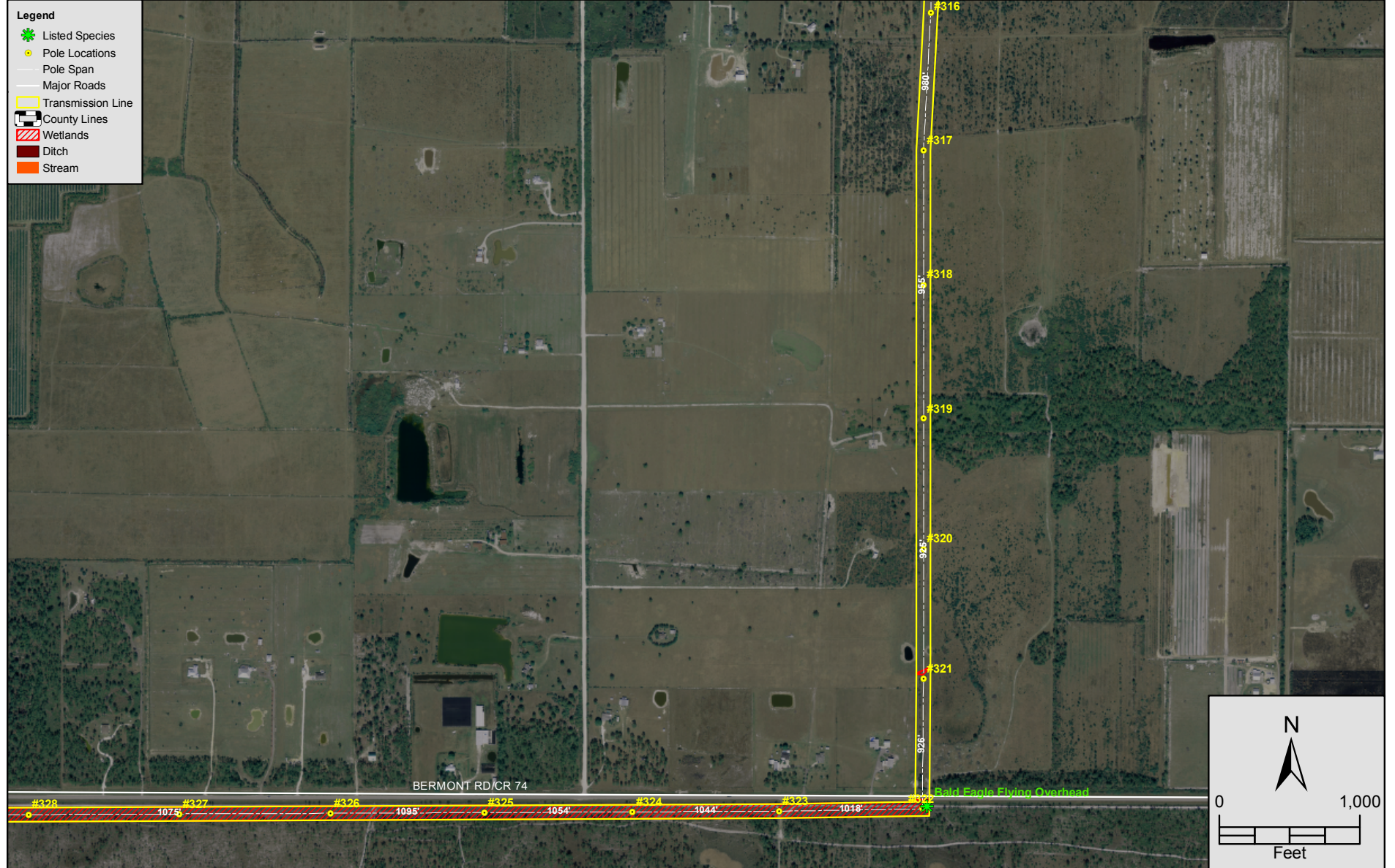


FIGURE 26 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.

PLAN VIEW - SHEET 26 OF 28

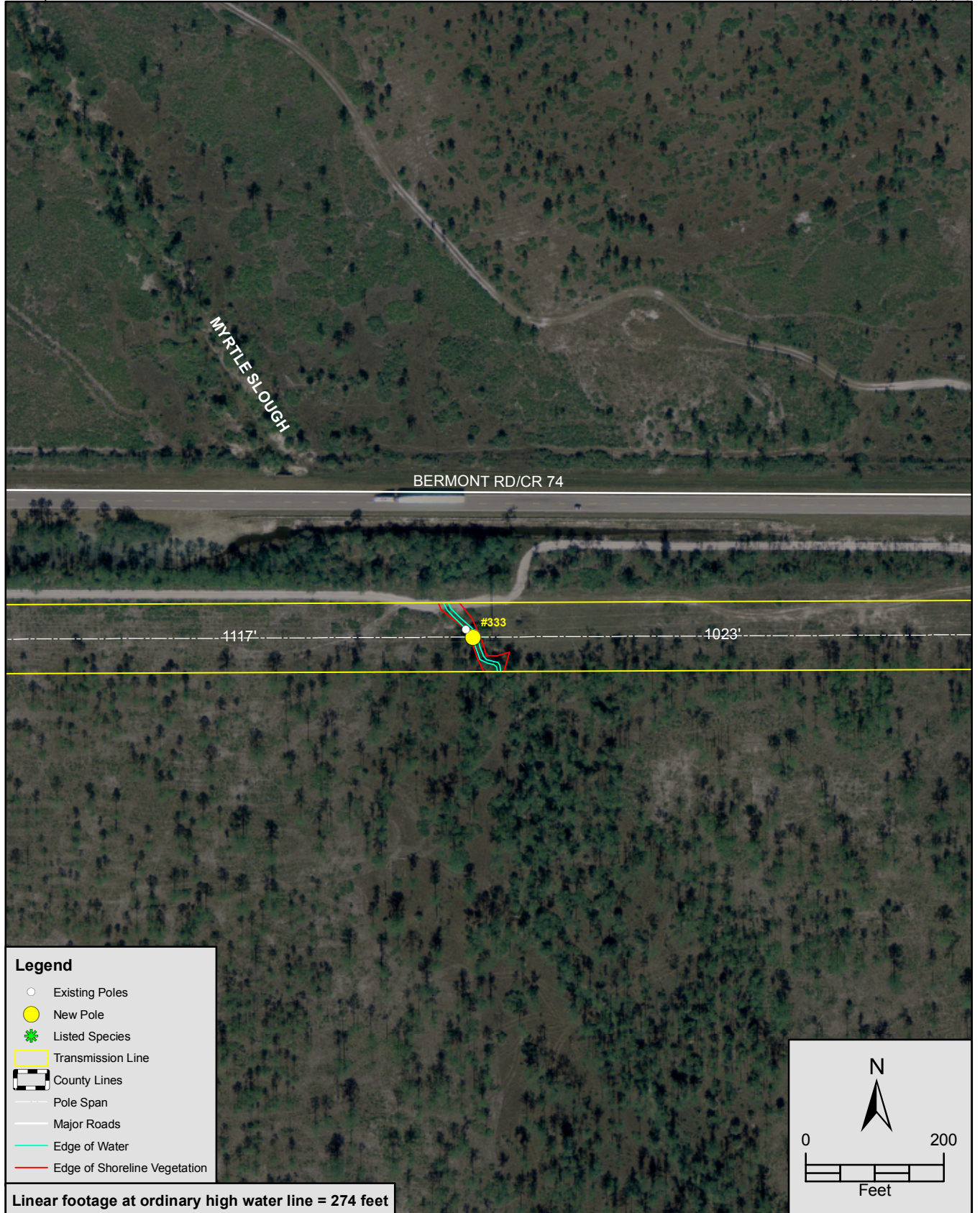
SEMINOLE ELECTRIC COOPERATIVE, INC.

VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR

CHARLOTTE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.





2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 27A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA

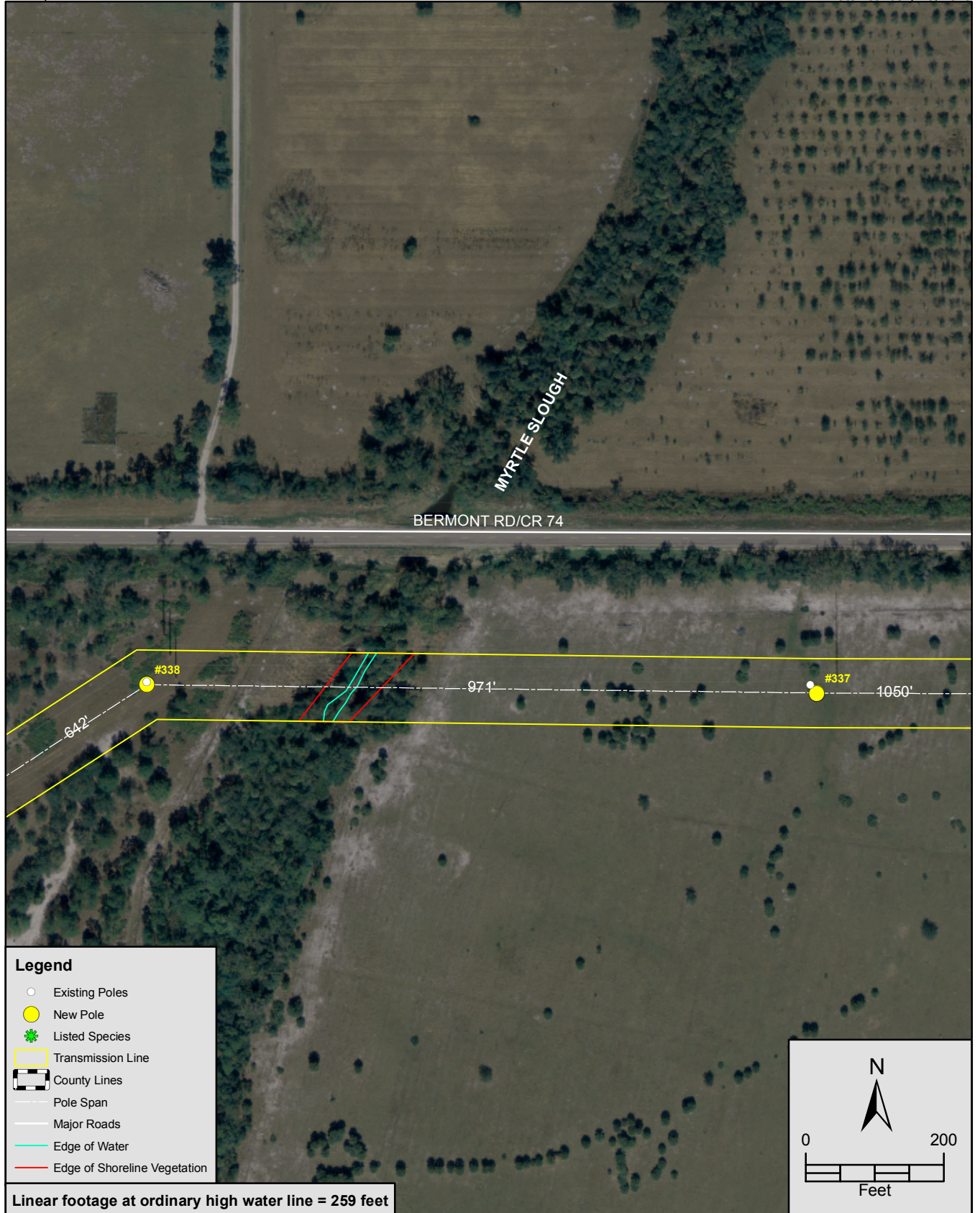
Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

Seminole Electric
 COOPERATIVE, INC.
MEMBERSHIP WITH THE FLORIDA POWER & LIGHT COMPANY



FIGURE 28 - 2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 28 OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.



2007 AERIAL PHOTO SHOWING NAMED STREAM CROSSING.
 PLAN VIEW - SHEET 28A OF 28
 SEMINOLE ELECTRIC COOPERATIVE, INC.
 VANDOLAH TO CHARLOTTE 230KV RECONDUCTOR
 CHARLOTTE COUNTY, FLORIDA

Sources: SWFWMD Aerial Photograph, 2007; Prepared by ECT, 2010.

Seminole Electric
 COOPERATIVE, INC.
MEMBERSHIP WITH A PURPOSE