



Southwest Florida Water Management District

2379 Broad Street (U.S. 41 South) Brooksville, Florida 34609-6899
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April 30, 1992

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Mr. James R. Frauen
Environmental Engineer
Post Office Box 272000
Tampa, FL 33688-2000

Subject: Additional Information Request
Hardee Power Station
230 Kv Transmission Line
(Vandolah Sub-station to PI 37)
Site Certification No.: PA 89-25
DOAH Case No.: 89-3560

Dear Mr. Frauen:

In accordance with the Conditions of Certification, Section XXXV, paragraph C. 1.a., this letter shall serve to advise that additional information is necessary to determine that the proposed activities conform to the rule criteria in Chapter 40D-4, Florida Administrative Code (F.A.C.).

Your submittal is lacking the information necessary for us to complete our review. Please provide the following information:

1. Please address the following impact and compensation quantification issues:
 - a. The following wetlands with proposed shrub clearing impacts are identified as not requiring compensation: KK, EEE, and TTT. Your submitted habitat descriptions and subsequent field determinations indicate that these areas are not nuisance species-dominated and therefore will require compensation. Please correct Table 1 and provide for additional compensation.
 - b. The following wetlands with proposed corduroy road crossings are identified as not requiring compensation: R, U, and TT. Field determinations indicate that wetland habitat loss will occur from these and therefore will require compensation. Please correct Table 1 and provide for additional fill compensation.

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- c. The following proposed clearings of forested wetlands have not been quantified nor compensation provided for: EEE and QQQ. Please quantify the acreage of impact, correct Table 1, and provide additional compensation.
 - d. Please clarify the acreage of clearing impact for wetland DD (0.19 on Figure 11 and 0.14 on Table 1). If necessary, please provide for additional compensation.
2. Please provide the approximate acreage for each wetland or wetland portion located within the designated right-of-way.
3. The quantitative assessment for wetland III states that species composition and areal coverage were estimated for the sub-canopy and ground cover. However, this data was omitted. Please provide this data so that we can evaluate the type-for-type wetland creation proposal. To help formulate success criteria, please also provide the total percent cover of desirable wetland vegetation for each stratum (canopy, subcanopy, and ground) and the total percent cover of nuisance species within the impact area.
4. You have proposed forested creation with only two tree species, Taxodium ascendens and Fraxinus caroliniana, to compensate for clearing impacts to diverse bottomland hardwood wetlands. As previously discussed on numerous occasions, the compensation ratio of 1:1 for clearing of forested wetlands is based on the assumption of type-for-type replacement. Given the difference in diversity between the impacted wetlands and the proposed wetland creations, you will need to provide a minimum of 2:1 of the proposed creation design. Please address.
5. Please address the following questions and comments regarding the wetland creation design:
 - a. The projected SHWL for slough 3 in the mitigation area vicinity is identical to the proposed control elevation of the rehydration berm but the values for these parameters for slough 2 do not similarly correlate. Please clarify this discrepancy.
 - b. Please identify the party responsible for the soil boring information. In addition, the depth of the hardpan was discussed in the meeting of February 28, 1992 but the information was omitted from this submittal. Please provide this information.

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- c. Please reconsider the design of the isolated marsh creation set at the estimated existing seasonal high water table (SHWT). The proposed SHWT of 25.0' is not based on site specific data and is not substantiated by your soil boring data. In addition, this estimate and those from the soil borings are based on existing conditions which you propose to change substantially with the proposed enhancement berms. Please address the effects of these anticipated changes in your creation design, not only for the isolated system, but for the entire wetland creation area, for which similar inconsistencies hold.
- d. The submitted drawings show various proposed elevations on the perimeter of the mitigation area with no detail regarding existing elevations and how the mitigation area will be graded to form a connection with the sloughs and upland areas. Please indicate proposed topographic contours and provide sufficient existing topographic detail to clarify the relationship of the mitigation area to the sloughs and existing grade. Please also show all proposed grading. Your plans define the mitigation limits at varying elevations which apparently differ from existing grade. Please distinguish between proposed topographic contours and limits of the mitigation areas.
- e. We have concerns with the mitigation area forming a direct hydraulic connection between the two slough systems that have different SHWL elevations. Please revise the proposed design to allow two separate creation areas that are hydrologically dependent on either slough.
- f. As discussed in our February 28, 1992 meeting we have concerns regarding the potential for tree development given the sub-surface hardpan which has been substantiated by your soils boring data. We discussed the potential solution of excavating a portion of the hardpan and back-filling with appropriate material to allow for viable root expansion. Your submittal has not addressed this issue. Without adequate resolution, we do not have reasonable assurance of the success of the forested portions. Please provide for design alternatives, support for your proposal, or consider alternative locations for your forested wetland creations. In addition, you will need to provide greater detail regarding the thickness of the hardpan, as requested in item 5.b., in order to verify that excavation will not breach this soil matrix.

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- g. The vast majority of the forested mitigation is set at varying elevations near the various SHWL elevations identified. Depending on the resolution of items 5.a, 5.d, and 5.e, you may need to change these grade elevations. Further, you have proposed tree species that are tolerant of a greater range of inundation than the limited range provided. We recommend that you provide for greater relief in grade elevations for the forested areas, given the uncertainty of final hydrologic conditions, to increase the likelihood of success.
 - h. Please replace the following upland species proposed in wetland areas with hydrophytic components: Ruellia caroliniensis, Psychotria nervosa, Erythrina herbacea, and Serenoa repens.
 - i. Similar to the marsh mitigation design, please indicate the proposed zonation of plantings for the forested mitigation areas.
 - j. Please be aware that the monitoring and maintenance plan for the wetland creation areas will be addressed as a permit condition, similar to Segment 1, so as to allow for a uniform plan when the entire mitigation area design is completed.
6. Please address the following questions regarding the enhancement areas:
- a. As previously requested and discussed in our field meeting of March 10, 1992, please provide specific success criteria for type A and B enhancement areas. Criteria need to be quantifiable and should be based on anticipated vegetative and hydrologic responses incurred by construction of the berms. Please contact the project Environmental Scientist, Howard Knight, to discuss suitable options.
 - b. Please provide for the following revisions to your monitoring plan:
 - i. Please indicate the number of sampling stations to be located on each transect.
 - ii. Please indicate that the monitoring data will be submitted with each monitoring report.
 - iii. Please provide for a narrative discussing how representative the sampling data is of the entire enhancement area.
 - iv. Please provide for a sufficient number of permanent staff gauges to adequately characterize hydrologic conditions in each distinct enhancement area. Please indicate that gauges will be surveyed to NGVD and monitored on at least a monthly frequency.

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7. Please clarify the number of proposed culverts to be placed at station 956+00 on Figure 20. The drainage computations and summary indicate 2-36" culverts are required to maintain existing flow conditions.

To help us expedite our review, please submit your response to the Bartow Permitting Department. In accordance with the Conditions of Certification, Section XXV, paragraph c.(1)(a), the permittees shall submit such information to the Southwest Florida Water Management District (SWFWMD) staff.

Note that in accordance with the Conditions of Certification, Section XXXV, paragraph C. 1.b., construction activities which have surface water management impacts shall not begin until the water management district has had an opportunity to assure that the activities are in compliance with the applicable rule criteria.

If I may be of further assistance please contact me in our Bartow office at (813) 534-7080.

Sincerely,

William A. Hartmann

William A. Hartmann, P.E.
Surface Water Permitting Supervisor
Bartow Permitting Department
Resource Regulation

WAH:JRB:cs303

cc: Mr. Hamilton S. Oven, Jr., P.E., Administrator, Siting Coordination
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