



Southwest Florida Water Management District

2379 Broad Street (U.S. 41 South) Brooksville, Florida 34609-6899
Phone (904) 796-7211 or 1-800-423-1476 SUNCOM 628-41

December 31, 1991

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Mr. Robert E. Yarbrough
Environmental Engineer
Post Office Box 272000
Tampa, FL 33688-2000

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

Dear Mr. Yarbrough:

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 still lacking the information necessary for us to complete our review. Please provide the following information:

1. Please be advised that we are responding solely to the proposed compensation for Segment 1 (Hardee Power Block to Vandolah). In regard to the compensation proposal for Segment 1, we have the following comments:
 - a. Wetland creation credit is given for those areas designed below the seasonal high water level (SHWL) elevation. Please revise the wetland creation design to reflect this criteria. The use (design) of very shallow slopes below SHWL could provide similar habitat. Alternatively, with planting, monitoring, and maintenance, areas above SHWL would provide significantly less credit toward compensation as upland reestablishment.
 - b. Please indicate which of the wetland creation areas, or portion of, is requested to be credited toward your type-for-type requirement. Alternatively, you may choose to address all of your compensation areas under type-for-type requirements.

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- c. Success criteria will need to be established for each of the wetland creation areas. Attached is a copy of our draft wetland compensation success criteria which should clarify the required detail. Information for the wetland creation areas that are subject to type-for-type compensation must be based on the quantitative assessment of the impacted wetland. The submitted quantitative assessment does not provide the following information that is necessary to establish the success criteria. You will need to provide the relative proportion of each zone to the total impact acreage, percent coverage of desirable species by zone and stratum, dominant species by zone and stratum, subdominant (greater than 10% coverage) species by zone and stratum, and tree density by zone. Considering the lack of these details, an alternative is to provide some agreeable values for the success criteria that is a composite of the best qualities of the impacted wetlands. Success criteria for the non-type wetland creation will require similar information that will be based on agreed upon design details rather than a quantitative habitat assessment. Please contact the project Environmental Scientist, Howard Knight, to discuss the details.
- d. Tree plantings using only one gallon sizes on 10' centers do not provide reasonable assurance that the creation will be successful. Please provide for tree plantings on 6' o.c. with a variety of sizes. Large size tree plantings will provide greater assurance that you will meet the success criteria and assure the survival of shade tolerant species.
- e. Unless mulch can be transferred from the wetland impact areas or another suitable source can be identified, the densities of herbaceous plants will need to be increased to 3' o.c. in the forested creation areas.
- f. Please indicate how the seasonal high water level (SHWL) and seasonal high groundwater levels (SHGL) were estimated. In addition, please indicate what the anticipated flux range within the mitigation areas is expected to be. In either case, please specify the methodology utilized to determine these values and provide the data that the estimate was based upon.
- g. Please provide a detailed monitoring and maintenance plan for the compensation areas. Discuss type of transect selected, basis for transect alignment, type of sampling points, reproducibility of method, water level measurements using a known reference, and the sampling of vegetative populations for comparison to success criteria. Attached is a copy of our draft monitoring form to be used for all compensation areas.

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 Southwest Florida Water Management District (SWFWMD) staff.

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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:cs121

cc: Mr. Hamilton S. Oven, Jr., P.E., Administrator, Siting Coordination
Section, Florida Department of Environmental Regulation, 2600 Blair Stone
Road, Room 309L, Tallahassee, FL 32399-2400
R. Viertel
R. Gannon
J. Burke
H. Knight

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