



April 27, 2016

Ms. Ann Seiler
Siting Coordination Office
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32339-2400

Via Electronic Delivery
ann.seiler@dep.state.fl.us

**Re: Tampa Electric Company
Big Bend Power Station Unit 4
20MW Solar Facility
Site ID: PA 79-12
Amendment Request AM13-119
Request for Additional Information**

Dear Ms. Seiler:

Tampa Electric Company (TEC) has received the Florida Department of Environmental Protection's (FDEP's) Request for Additional Information (RAI) letter dated April 25, 2016 for TEC's above referenced project. The FDEP Comments and the corresponding TEC Responses are provided below.

A. The Department of Environmental Protection Southwest District Environmental Resource Management Program

SWD ERP No. 29-0126191-010-SA

FDEP Comment 1:

The narrative provided in Section A of the Joint Application for an Individual ERP states "the area within the solar array will be seeded with a low lying grass of vegetative cover." However, the engineered project drawings provided with the application have notes stating "no grading mow existing vegetation." Please confirm that mowing is the only proposed impact to the existing wetland vegetation (besides for removal of invasive exotic species such as Brazilian Pepper) and no alteration to the grade or vegetative cover is proposed except when necessary to stabilize loose soils resulting from construction activities. If additional vegetative impacts are proposed within wetland areas, please revise UMAM scores to reflect this. [Pursuant to Sections 10.1.1, 10.2.1 and 10.2.7, of the ERP Applicant's Handbook Volume I]

TEC Response:

To clarify the information in the narrative and engineering project drawings, TEC is primarily planning to only mow existing vegetation in the upland and wetland areas of the solar panel arrays and other facilities, except for the removal of invasive species. The only areas planned for grading are the access roads, substations, communication building, and drainage swales and to remove the spoil piles. The areas disturbed by grading in both upland and wetland areas will be seeded with low-lying grass or vegetative cover to stabilize loose soils.

Other than these dredging and filling activities in wetlands that have been previously identified in the joint application, there will be no additional disturbance to the vegetated cover in wetlands, except for mowing. The existing wetlands have been maintained by cattle grazing and trampling activities. After the removal of the cattle and installation of the solar panel arrays, mowing is not considered significantly different from existing impacts, and UMAM impact scores reflect this factor

FDEP Comment 2:

The area labeled as a "swale" which runs east to west across the large north central pasture was observed during a site visit conducted by Department staff on April 21, 2016. This linear conveyance feature had similar vegetative coverage and species diversity to the wet prairie (FLUCCS 643) wetlands to the west. Additionally, hydric soils were noted in the bottom of the feature. Drawings EX-4-A of the submitted project drawings shows this feature to be a flow path or drainage way for Basin A-2 of the project. Additionally, some of the project drawings and the elevation surveys show this feature connects to a ditch on the perimeter of the project area. Review of historical aerial photography shows this feature to occur under a row of Australian Pines in the 1970s as is found around nearby ditches in the area. It is likely a shallow upland-cut ditch that does not hold water except during the wet season. Swales, by definition, contain areas of standing or flowing water only following a rainfall event. The wetland community and hydric soils present indicate this area saturates or inundates on a more regular basis than that. Please add this conveyance feature to the wetland figures, tables and project drawings as a shallow upland-cut ditch. As such FDEP does not require mitigation for impacts to upland-cut ditches. It will, however, count toward total wetland and other surface water impacts within the project area. [Pursuant to Chapter 62-340, Florida Administrative Code, and Sections 10.1. and 0.2.2.2, of the ERP Applicant's Handbook Volume I]

TEC Response:

Please find attached revised project drawings depicting the above referenced conveyance swale delineated by top-of-bank (see Attachment A). In addition, please find attached the revised wetland impact Table 1 and revised natural resources Figure 4 (see Attachment B).

FDEP Comment 3:

According to Grading Plan – 4 of the submitted construction plans, signed and sealed by Shawn Dekold on 3/8/16, underdrain is being proposed within the grassed swales on each side of the access road between STA 83+25.62 and STA 31+00.00. Based on geotechnical information submitted with the application, it appears that these underdrains will be located below the Seasonal High Water elevation (SHW). Please modify the swale design in these locations to be lined to separate the underdrain from the water table, or raise the elevation of the road in this location so that the design of the underdrain will not contribute to groundwater contamination by mixing groundwater with stormwater runoff. [Pursuant to the Applicant's Handbook, Volume II, Section 4.1.b.2]

TEC Response:

Please find attached, the revised drawing (No. 339-FY-96AE Rev. G, Grading Plan – 4) that shows the liner to separate the underdrain from the water table (Attachment A).

FDEP Comment 4:

According to Grading Plan – 1 of the submitted construction plans, signed and sealed by Shawn Dekold on 3/8/16, the enlarged view of the Comm Building pad shows that the eastern half of the pad is graded to runoff into the wetland ditch that borders the eastern boundary of the project without any treatment. Please adjust the pad grades to ensure that runoff is being treated within the designed system. [Pursuant to Applicant's Handbook, Volume II, Section 4.0]

TEC Response:

Please find attached, the revised drawing (No. 339-FY-96AB Rev. F, Grading Plan – 1) indicating a 6-inch treatment ditch on the east side of the pad (Attachment A). Also attached is a revised Stormwater Management Plan with calculations indicating compliance of stormwater treatment (Attachment C).

B. The Southwest Florida Water Management District (SWFWMD)

SWFWMD Comment 1:

There an existing Water Use Permit (WUP) for a cattle feed lot on the northern portion of the project site (WUP No. 2007259.004). What is the Licensee's intent regarding this permit? Will there be any remaining demand for the permitted use? If yes, the Licensee will need to submit an application for modification. If not, the Licensee will need to submit a written request for cancellation.

TEC Response:

It is TEC's intent to keep the permitted quantities and use for these wells. While the proposed project does not require water, cattle will still be grazed on adjacent TEC

property and water will be needed. The wells are located at the edge of the proposed project and will have new above ground casings and protective bollards installed. Currently, TEC is working with SWFWMD-Tampa Service Office and will apply for a minor modification to represent the revised boundary for the WUP.

SWFWMD Comment 2:

There are existing wells on and adjacent to the project site authorized under WUP Nos. 20006233.007 and 2007259.004 that could potentially be impacted by the proposed project and related construction activities. Please provide an assessment of any wells that may be potentially impacted and any plans to protect, replace and/or abandon these wells.

TEC Response:

The groundwater wells associated with WUP 20006233.007 are located approximately 0.5 miles north-west of the project boundary and as such will not be impacted by the proposed project. DID-8 associated with 20006233.007 is the reclaimed water line from the County. This pipeline has been staked and the section nearest the proposed project will be adequately protected during construction. As mentioned above, the wells associated with 20007259.004 will have new above ground casings and protective bollards installed.

In addition, please find enclosed a letter from James Golden (SWFWMD) dated April 26, 2016 indicating the additional information TEC submitted to SWFWMD, via email, on April 25, 2016 satisfies their comments and they have no further objections to the proposed amendment (Attachment D).

C. The Department of State – Division of Historical Resources (DHR)

DHR Comment:

As a post-certification submittal, please submit a hard copy of the Cultural Resource Survey conducted by Janus Research in July 2015, and included in the Amendment Request, to the Division of Historical Resources for their review.

TEC Response:

A hard copy was delivered to DHR on the morning of April 25, 2016. A copy of the transmittal letter is attached (Attachment E).

D. Hillsborough County Environmental Protection Commission (EPC)

EPC Comment 1:

Upon review of this project it involves construction activities which by its nature will generate fugitive dust emissions, and it included a commitment to control those emissions by the use of water trucks. This is acceptable as long as large swaths of land are not barren posing the

potential for natural elements (winds) to cause dust to leave the property and impact any nearby occupied dwelling(s). If the latter should occur, more aggressive best management practices must be employed (i.e., seeding, mulching, dust stop, haying or combinations of such, etc.).

TEC Response:

TEC is committed to ensure control of fugitive dust from the proposed project by the use of various types of Best Management Practices (BMPs). As the proposed project moves forward TEC will constantly review BMPs as it relates to fugitive dust.

EPC Comment 2:

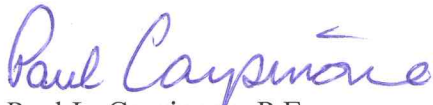
The project also indicates that land clearing activities will take place and that permits will be acquired from the Florida Forestry Services (FSS). This facility and project does not meet the criteria set forth in the FSS permitting process. And all open burning activities associated with this project are subject to provisions of our Chapter 1-4 Open Burning Rule. If land clearing is required, an application should be submitted to the EPC and include the appropriate fees.

TEC Response:

TEC is not planning on performing any open burning during the construction of the proposed project, but if the need arises, TEC will submit all applicable forms to the EPC.

If you should have any questions or require any additional information, please do not hesitate to contact me at (813) 228-4858. Thank you for your kind attention to this matter.

Sincerely,



Paul L. Carpinone, P.E.
Director
Environmental, Health & Safety
Tampa Electric Company

EHS/rlm/AJA858

Enclosures

c/enc: Larry Curtin
Jack Doolittle