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WITHLACOOCHEE REGIONAL PLANNING COUNCIL
SERVING LEVY, CITRUS, MARION, SUMTER AND HERNANDO COUNTIES

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December 12, 2008

DEPARTMENT OF
ENVIRONMENTAL PROTECTION
DEC 15 2008
SITING COORDINATION

Mr. Mike Halpin, P.E.
Siting Coordination Office
Department of Environmental Protection
3900 Commonwealth Blvd., MS#48
Tallahassee, FL 32399-3000

SUBJECT: Final Agency Report for Progress Energy Florida's Levy Nuclear Plant Units 1 and 2 Site Certification Application

Dear Mr. Halpin:

Pursuant to Section 403.507 of the Florida Statutes, Withlacoochee Regional Planning Council (WRPC) staff has written a final agency report for the main plant and associated facilities portion of the above-referenced application. This statement seeks to identify the goals and policies of the WRPC's Strategic Regional Policy Plan (SRPP) that will be affected by this proposal. Council staff writes its report for the benefit of the public, the applicant and all interested parties to define anticipated impacts of the proposed project on the region's SRPP.

PROJECT OVERVIEW

Progress Energy Florida, Inc. proposes construction of a nuclear power plant in unincorporated Levy County, Florida. The subject property is a 3105 acre parcel directly east of US 19 and approximately 4.1 miles northeast of the Town of Inglis. The developed area on-site should equal 300 acres or nearly 10% of total area. Primary site features would include plant buildings, two (Westinghouse) 1154 MWe AP1000 standard design pressurized water reactors, mechanical draft cooling towers, stormwater retention ponds, a 500 kV transmission line switchyard, a wellfield, access and heavy haul roads, and a meteorological tower. The site's landform is strongly characterized by wetlands and floodplains.

Aside from high-voltage electrical transmission lines functioning to transfer energy to market, associated facilities, which support plant construction and operations, would exist on-site or off-site. Principal road access to the plant would be provided from points along US 19. But a heavy haul road would facilitate the movement and delivery of plant components by barge during construction phases. The haul road would start at a planned barge slip on Cross Florida Barge Canal (CFBC), intersect CR 40, and then proceed north to terminate inside the development area.

Also included as associated facilities, two pipelines would function to transport seawater utilized for power generation. A cooling water pipeline facility would supply saltwater from the CFBC via an intake structure to each reactor, while wastewater (backwash and blowdown) pipelines would move cooled water to the existing Crystal River Energy Complex discharge location in Citrus County. The shared pipeline corridor would measure 13 by 0.25 miles and is co-located by the haul road for part of its route.

ANALYSIS

1. Emergency Preparedness—Preparation, Response and Recovery

The proposed nuclear plant and associated facilities may impact emergency preparedness, response and recovery from local to regional scales. Hazards requiring mitigation action may also exist due to the specific nature of plant operations. Plant facilities would likely constitute critical infrastructure, making safety and security issues of interest to all localities within its vicinity. To maintain broad consistency with the SRPP's emergency preparedness content, the applicant should work with affected local governments to fully integrate new facilities into all emergency management planning processes. An equal standard of preparedness should be implemented for both the main plant and associated facilities.

In Florida, regional planning councils function as authoritative agencies for the Statewide Hurricane Evacuation Study. Recently compiled findings, from the 2007-2008 survey, aim to inform evacuation behavior within the region leading to improved transportation and shelter analyses. It is useful to note that Chapter 14 of the *Statewide Evacuation Study: Withlacoochee Report* addresses the question of evacuation behavior of populations near the existing Crystal River nuclear plant. The statewide evacuation study confirms well over half of the region's residents will follow the instructions of public safety officials in the event of an emergency, regardless of whether instructions require evacuation or that individuals shelter-in-place. Furthermore, almost half of the region's residents indicate that they have written instructions of what to do in the event of an accident at the Crystal River plant site. As such, *Statewide Evacuation Study* findings support a view that directly affected populations have been informed as to the risks associated with a facility of this type; but it also means an identical standard of emergency planning should continue to apply to future development of new nuclear power facilities.

Because of the need to locate nuclear power plants in proximity to a constant source of cooling water, many are sited in coastal areas. If constructed, the proposed Levy Nuclear Plant may be one of the few nuclear power stations in Florida outside of a Category 5 Hurricane Surge Zone. While the SRPP supports a decision to locate new facilities outside of hurricane surge zones, it should be necessary to implement a program of mitigation to address vulnerability to coastal storm and flood hazards. A portion of the subject property abuts US 19, which has been designated a regionally significant hurricane evacuation route. Any hurricane event would inundate the vicinity of the plant with storm surge. Areas most likely to be impacted by storm surge include surrounding coastal communities, where plant workforce may reside, and major transportation facilities. On-site the plant and associated facilities may be especially vulnerable to flood hazard, given that so much of the site exists in the 100-year floodplain.

The following SRPP goals and policies apply:

Goal 3.1 All counties in the region will be prepared to respond to and recover from the impacts of all hazards.

Policy 3.1.2 Periodically conduct a self-assessment of emergency preparedness, response and recovery capabilities.

Policy 3.6.1 Limit industrial and public utility land use activities where extremely hazardous substances would routinely be used near large populations and/or public facilities.

Goal 3.7 Hurricane evacuation clearance times for the region shall be reduced by requiring that new developments not degrade the existing evacuation level of service as identified in the Withlacoochee Hurricane Evacuation Study.

Policy 3.8.6 Prohibit improvement of or building of public facilities which encourage growth in hurricane surge vulnerable areas, except for necessary public services for existing developments.

Goal 5.8 Maintain adequate capacity on evacuation routes to complete movement of vulnerable populations prior to the onset of pre-landfall hazards.

Conditions:

1) To maintain consistency with the SRPP's emergency preparedness content, the applicant should work with affected local governments and other stakeholders to fully integrate the plant into all emergency management planning processes.

2) Each of the main plant's associated facilities should be integrated into overall emergency management and response planning for the proposed nuclear power generation complex, so that the same standard of preparedness applies to all facilities covered by the site certification application process.

3) Due to the flood-prone nature of the site and vicinity, the applicant should organize and implement hazard mitigation efforts of the type employed at more vulnerable coastal power stations. Adverse and unintended consequences could result when essential infrastructure serving a region fails to operate because of area specific hazards.

2. Transportation

The efficient and economical transport of people and goods directly impacts regional quality of life and well-being. The proposed location of the plant is east of US 19 and in the vicinity of SR 121 to the north. CR 40 is located to the south. All three roadways are regionally significant.

The impact of plant activities on the land use/transportation relationship is relevant. Construction and permanent employment at the subject location will increase regional travel demand. Commuter trips will concentrate on those regionally significant, high capacity roads offering best plant origin or destination mobility options. Frequency of truck trips generated could impact quality or level of service on regionally significant roadways, emphasizing the importance of a multi-modal and regional approach to freight transportation. Road service volumes will grow in proportion to intensity of use matching the plant's role as a traffic generator in the land use pattern, reducing whatever surplus capacity is present and available in the road network. Associated facilities should not function to constrain regionally significant roadways.

Specifically, full assessment of project development requires identification of the largest traffic impacts to regionally significant roadways. The most significant impact to road function should occur at signalized intersections due to PM peak hour traffic congestion. A key concern remains access control on US 19. To help preserve characteristics of uninterrupted traffic flow, access management best practices should be employed to determine where access is inappropriate, to align access effectively between adjacent traffic generators, and to minimize access to only what is necessary to serve all users of US 19. If future development on the US 19 corridor results in new signalized intersections, then coordination between neighboring uses is advisable. CR 40 provides a vital east-west route between regional activity centers. CR 40 surface quality should be maintained during construction phases as freight moves across the haul road intersection.

Development of project infrastructure may also present new opportunities to plan enhancement of regionally-scaled, multipurpose trails. For instance, required improvements could allow greater trail system linkages. Alternately, project improvements might have a role in expanding trail accessibility and safety, help provide amenities or increase design value. Therefore, staff suggests the applicant engage all regional stakeholders and the public to identify and coordinate action on any such possibilities resulting from project certification. The clear starting point in this effort would be exchange of ideas with the Office of Greenways and Trails over cooperation in facility development.

The CFBC's suitability to act as waterway for barge freight will benefit from the applicant's proposal to construct a barge slip off-site. Improvements to the barge slip located on the north side of the canal (adjacent to Inglis Island) may further recreational access to the regionally significant Marjorie Harris Carr Cross Florida Greenway. Barge traffic should also increase, growing this location's importance as a regionally significant port facility. Whether, or to what degree, increased freight flow on the Cross Florida Barge Canal may constrain recreational use of the canal remains unknown as do the contrasting economic benefits. The applicant is encouraged to help define optimal use of the CFBC through cooperation with all interested parties to assess the capacity of the CFBC, leading to the establishment of parameters to guide all future use.

The following SRPP goals and policies apply:

Goal 5.2 Increase the utilization of bicycle and pedestrian ways in the region.

Policy 5.2.1 Bicycle and pedestrian facilities, and multi-purpose greenways, shall be part of the multi-modal planning and development of transportation facilities, including the incorporation of such ways into state, regional, and local transportation plans and programs. Bicycle and pedestrian ways shall be established in conjunction with the construction, reconstruction, or other change of any state transportation facility that fulfills transportation plans; special emphasis should be given to projects in or within 1 mile of an urban area.

Goal 5.4 Protect future right-of-way for regional transportation facilities from building encroachment and incompatible land uses through the designation of regional corridors.

Goal 5.5 Provide transportation facilities to ensure that the regionally significant roadways operate at acceptable levels of service.

Policy 5.5.7 Access management controls on regionally significant roadways should be coordinated between the pertinent permitting agencies and local governments and consistent with F.A.C. 14-96 and 14-97 in order to maximize operating capacity and improve the safety of regional roadways.

Policy 5.7.2 Encourage the development of facilities for efficiently moving goods and services within and through the region, including conventional and high speed rail, shipping, pipelines, transmission lines, and communications technologies.

Goal 5.9 Plan for land use patterns that provide better opportunities for non-automotive trips.

Conditions:

1) Development of the main plant and associated facilities should not constrain, impede or otherwise limit future development of the region's transportation system. Road surface quality along CR 40 should be maintained throughout all construction phases, especially as heavy freight moves across the haul road intersection.

2) Any Environmental Resource Permit (ERP) issued should be conditioned on the creation of a trail development plan coordinated with the Office of Greenways and Trails, local governments, other stakeholders and involving public comment and participation.

3) In conjunction with all interested parties, the applicant should examine how plant construction and operation could impact the use of the Cross Florida Barge

Canal; a necessary preliminary task would be to initiate a capacity analysis to help inform the decision-making process.

4) The applicant is encouraged to be an active stakeholder in the transportation planning process, working within local and state processes alike, to forward best case outcomes for regionally significant transportation facilities.

3. Economic Development

The SRPP identifies the Withlacoochee Region's abundance and quality of natural resources as positive locational aspects conducive to development of an eco-tourism industry. In particular, the plan names the region's forests, rivers, lakes, springs and rural character as primary economic assets. Increased regional incomes and employment are cited by the SRPP as principal regional benefits of eco-tourism. Accordingly, the SRPP prioritizes development of the region's eco-tourism industry as necessary for regional economic prosperity.

Whereas transmission lines may negatively impact the region's eco-tourism industry without mitigation, the main plant and neighboring facilities should have minimal impact. The subject location's distance from US 19 will likely conceal the plant. On balance, this means the plant's effect on viewsheds of regionally significant roadways and other locations would be of limited impact. Except where noted in the next section of this report, other possible net adverse economic impacts related to plant construction and operation have not been identified. Associated facilities should be designed in such a way as to minimize the need for future expansion or else allow for co-location to occur within present corridor or area boundaries.

The SRPP's energy planning content provides context for assessment of the economic benefits of facility electrical production. The SRPP discusses regional energy use, recognizing that all human systems require energy to function. It likewise stresses efficient use of the region's energy resources. It also prioritizes development of electrical energy generation from a variety of sources. Moreover, the region's SRPP identifies electrical plants as necessary for best case regional development thereby prefrencing them as regionally significant facilities.

As proposed, the nuclear power plant has the potential to create significant, positive regional economic impact. Nuclear power plant construction requires greater upfront capital outlay and longer construction periods than alternative facility types. Besides income gain through direct job creation, privately owned nuclear power plants yield a range of fiscal benefits to public sector finances. Plant construction has the clearly recognizable effect of increasing tax revenues—including sales, corporate income, ad valorem (property) taxes, and could raise other miscellaneous tax receipts. In the context of the region's rural population density, the anticipated number of 773 full-time, permanent jobs created should have stronger impacts based on the smaller sizes of the rural labor force and populations. Withlacoochee Regional Planning Council staff has applied REMI regional economic modeling software to examine the economic impact of facility construction and operation over the first ten years of the plant's anticipated life cycle. Model results confirm net positive economic impacts.

Action may still be required, however, to secure the most positive regional economic outcomes. Plant workforce payrolls can be substantial, but have a reduced contribution to gross regional product in proportion to the degree that workers reside elsewhere and commute to work. The history of general case nuclear plant development shows major construction purchases and subsequent procurements tend to be made from non-local suppliers. Therefore, applicant initiatives to recruit a workforce from the regional labor pool and utilize local suppliers when feasible would strengthen the regional direct and indirect benefits of this project, while complementing SRPP economic development content.

Co-location of other uses on-site or in proximity to the plant may offer unique economic advantages. Some industries may be very compatible, owing to plant residual outputs which could act as inputs to other industries. For example, excess heated water from the power generation process could be applied to desalination or other industrial uses. Overall, economic linkages formed through co-location at the plant site would aid efficient use of surplus energy, while facilitating new industry and markets. Expanding total use should be more than feasible as the percentage of site area remaining at the subject location, after excluding the portion reserved for development of the plant and associated facilities, remains substantial. The SRPP supports such an innovative approach.

The following SRPP goals and policies apply:

Goal 2.3	Cultivate an economic climate that provides economic stability, maximizes job opportunities and increases per capita income for the region's residents.
Policy 2.3.7	Increase coordinated economic development approaches through partnerships among education, business, industry, agriculture and the arts.
Policy 2.3.10	Increase intra-regional cooperation in attraction/expansion of industry dependant upon close proximity to one another or actual co-location.
Policy 2.7.2	Maintain land adjacent to agricultural areas in uses that are compatible with agricultural activities through comprehensive plans and land development regulations.
Goal 2.9	Tourism directed primarily towards eco-tourism.
Goal 2.11	To promote efficiency and economic productivity from economic development by ensuring that future economic development and transportation projects are properly sited to avoid and/or mitigate adverse impacts to incompatible adjacent land uses.
Goal 2.12	To provide for the development and maintenance of adequate infrastructure and resources to support continued economic development in areas identified for growth in the local government comprehensive plans.

Policy 4.15.1 Use renewable energy sources wherever feasible.

Conditions:

1) The applicant should cooperate broadly with workforce development agencies, community colleges and universities, as well as economic development organizations to maximize local employment during plant construction and operations.

2) To protect the region's viability as an eco-tourism destination, ensure that associated facilities make the least visible impact to viewsheds.

3) Co-location with other uses to the greatest extent possible may represent a best case economic outcome. Staff urges investigation of the methods that would make such activity feasible.

4) Design and place associated facilities so that future expansion will be located in proximity to existing improvements or in common facility corridors as a practical approach to safeguard the region's character as an eco-tourism destination.

4. Housing and In-migration

While the construction workforce should vary in number from 2010 to 2017, the applicant states that it will reach a peak of 2700 workers in 2014. More generally, the 3-year period of 2013 to 2015, will see an average annual employment of 2500 workers. Where possible, impacts from construction workforce in-migration should be anticipated and mitigated. Demand for quality workforce housing and essential public services has been well identified as a primary impact nexus to surrounding communities' health, welfare and safety. As a result, discussion of housing issues should encompass more than affordability to include consideration of the potential for crowding of dwelling units, the quality of workforce housing—especially temporary housing, and the relationship between the location of workforce housing and the transportation system. Applicant initiatives addressing workforce housing concerns would be positive and may significantly reduce potential impact.

Reference the following SRPP policy:

Policy 1.3.1 Maximize choice in housing location for very low, low and moderate income households, promote dispersion of affordable housing units, and promote accessibility to jobs, schools and services through locational principles and criteria established in local government comprehensive plans.

5. Natural Resources

Staff expects a number of project impacts will relate to regionally significant natural resources and systems. The SRPP names a wide variety of natural resources including water bodies, certain wetlands, known habitat areas, ecological communities, and public lands as regionally significant. Of particular concern is where proposed facilities would directly impact or otherwise cross lands with designated conservation or other protected status. Such areas serve vital natural system functions, where true mitigation of adverse impacts may or may not be possible.

Final review indicates that the following regionally significant public lands may be located within or around the main plant and associated facilities (excluding transmission lines): The Marjorie Harris Carr Cross Florida Greenway, Crystal River State Preserve, Withlacoochee State Forest, and Waccasassa Bay Preserve State Park. The location of the plant and associated facilities is near the following surface water bodies: the Withlacoochee River, Lake Rousseau, and the Crystal River. Both the Withlacoochee and Crystal Rivers are designated as Outstanding Florida Waters (OFW). The development site is also located in proximity to coastal resources of regional significance. These include the Big Bend Aquatic Seagrasses Preserve and Estuary, coastal Class II seawaters, as well as salt or freshwater marshes and swamps. A systems-wide analysis required examination of impact to regionally significant natural springs and aquifers.

As a result of construction, numerous disturbances to the landform and watershed could occur on or around the subject location. Construction of the plant and associated facilities would clear land cover as site preparation. Other related impacts might consist of temporary on-site construction-related improvements, changes to existing drainage patterns, grading (excavation and fills), possible subsidence, elevated sediment yields, wetland or floodplain impacts, and temporary loss of ambient air quality. In all cases, the region's SRPP can only support changes to regionally significant natural features and systems in proportion to the degree that restoration of original conditions remains possible.

Active site development during the construction phase has the potential to affect existing landform conditions. For construction activities near wetlands and surface water bodies, appropriate turbidity, erosion and sedimentation control measures should be implemented and maintained until such activities are completed and side slopes have been stabilized. These techniques could include the use of anchored silt fences, turbidity curtains, stacked hay bales, mulch, and sod along unstable slopes and embankments, and reduced construction vehicle activity. Permitting should require construction activities minimize disturbance, especially to sensitive areas including wetlands, hydric soils and slopes as well as disturbance to rivers, lakes, streams, and floodplains. The applicant is encouraged to plan for comprehensive mitigation of all wetland and floodplain impacts, especially through actions consistent with a natural systems based approach. Given the scale of wetlands on-site and magnitude for potential disturbance, staff would ask that ERP review define mitigation obligations through a controlling Wetland Mitigation Plan (WMP).

As early as preliminary construction, it is possible that development of the main plant and associated facilities will create new, temporary and permanent impervious surface area. Impervious surface created by development equals a key measure of land use intensity. Staff has concern over the quantity of impervious surface area that could accompany development of the plant and associated facilities. Impervious surface area necessarily limits infiltration of precipitation, groundwater recharge, may contribute to a reduction in the water table and potable water supplies, and reduces base flow to wetlands and surface water bodies. Impervious surfaces also increase runoff and may present other unintended consequences. Creation of new impervious surface area can be a causal agent decreasing water quality in regionally significant rivers, lakes and springs. Impervious surface area should be minimized and then impacts mitigated through active planning and management adequate to accomplish watershed protection.

From the SRPP's perspective, natural resource impacts of most concern are those which are unavoidable and cannot be mitigated. Particular elements of main plant and facility operations may either individually or cumulatively function to create impacts where restoration of original conditions would be difficult or total scale of impact is unknown. Thus, the air and water quality, hydrological, ecological and thermal impacts of plant operations must be evaluated to determine impacts to identified regionally significant resources. In general, to achieve any consistency with the SRPP, the applicant must demonstrate that mitigation actions go beyond the minimum level necessary for permit approval.

The SRPP seeks mitigation of the impacts resulting from plant operation that could decrease regional environmental quality. A number of the residuals of plant operation have the capacity to adversely impact regional environmental quality. Treatment of seawater used in power generation with biocide will result in chemical discharge that could negatively affect regionally significant coastal water quality as well as plant and animal communities. The intake and discharge of seawater also has the potential to impact salinity in the estuarine waters of the Florida Barge Canal and elsewhere where released into the Gulf of Mexico.

Plant thermal output forms another impact category. If water temperature increase accompanies the release of heated wastewater from the main plant, then regionally significant aquatic ecosystems may be adversely impacted. Scope of thermal impact is dependent on total change. Yet once existing conditions have been altered, variation in thermal characteristics or even the periodic absence of heat output could create other impacts across a range of water quality attributes. Additional uncertainty could result from variation in thermal output due to normal operations/interaction of either the existing Crystal River Nuclear Plant or the proposed facility.

Total water quality impacts, of the type listed above, could have determinant impact the viability of the region's aquaculture industry. Either as a consequence of individual or cumulative impacts, damage to regionally significant seagrass beds, Class II coastal waters suitable for shell fish propagation and harvesting, salt marshes, mangrove swamps, other fresh and saltwater swamps, or even regionally significant rivers could have adverse consequences for the aquaculture industry with negative consequences for regional economic prosperity. At a minimum, monitoring activities informing water quality should be structured to allow for tracking of impact to the region's aquaculture and commercial fishing industries.

Still different impacts to ambient environmental quality could result from the release of cooling tower drift emissions. The applicant currently proposes no monitoring program for air quality impacts, because the total amount of drift emissions is not forecast to exceed the controlling regulatory standards. However, monitoring of air quality at the subject location would fulfill a useful purpose. Monitoring of air quality on-site and in the plant's vicinity would generate data to better support the air quality impact assessment process as future use develops on-site. Therefore, staff encourages the applicant to reexamine how air quality data might be efficiently collected within the context of already proposed monitoring programs on a scheduled or even intermittent basis.

Although generation of electrical power is expected to utilize 122 million gallons per day (mgd) of Gulf of Mexico seawater, an average of 1.58 mgd of freshwater would be withdrawn from the Floridan aquifer for plant systems. In addition, peak freshwater consumption from use on-site is estimated at 5.8 mgd. The applicant plans to reuse stormwater and has stated intent to use the lowest quality available water to achieve function, thereby reducing plant freshwater consumption. These actions are constructive and help recognize and affirm the importance of a practical approach to water conservation within the context of project development.

However, initiatives to minimize groundwater withdrawals through identification of alternative water supplies are positive. Local, long-term comprehensive planning may organize a sub-regional wastewater system as inter-jurisdictional joint public facility, which would be regionally significant when developed. If taken as another water supply source, such a system could further reduce plant groundwater demand. Decreasing plant water use benefits the prospects of safe yield freshwater withdrawal from the Floridan aquifer, itself regionally significant. By limiting scale of impact, safe yield aquifer withdrawal will help protect water dependent regionally significant resources, including natural springs and ecological systems.

Unless effectively mitigated, development of the plant and associated facilities could adversely impact regionally significant ecology through removal of existing habitat, change to vicinity conditions, and the introduction of new hazards to wildlife. Examples of adverse impact stemming from project development include avian collision or entrainment related mortality. Such wildlife and habitat concerns are of added weight given that the subject location for the plant and associated facilities is contiguous with the Goethe State Forest. The forest is protected conservation area, providing a location for multiple regionally significant resources and systems. It provides vital habitat area on a regional scale.

Recognizing the importance of such issues, the applicant has used data sources and observation to inventory occurrences of listed species within study area counties. But the scale and location of the project requires that the process of establishing impact to listed species, which has already been initiated, should be concluded by active wildlife management planning to address comprehensively questions of habitat loss and species interface. If fragments of habitat are identified on-site or where associated facilities exist, then mitigation activity should provide linkages of habitat patches through wildlife corridor design and implementation.

The following SRPP goals and policies apply:

Goal 4.3	Prevent further degradation and restore ground- and surface-water quality.
Policy 4.3.3	Require new development to locate and construct impervious surfaces, buildings, lawns, and sewage facilities so that they do not adversely affect the quality of nearby surface waters.
Policy 4.3.4	Require all development activities that create stormwater runoff to treat the water to meet state water quality standards before discharge.
Goal 4.4	Maintain the integrity and natural value of floodplains, and manage floodplains through non-structural means.
Policy 4.4.9	Make structural alterations to natural bodies of water only where necessary to restore natural system functions.
Goal 4.8	Avoid adverse impacts to the natural functions of the region's wetlands or surface water systems from development and redevelopment.
Policy 4.8.5	Prohibit new interference to the functions of coastal and riverain wetlands as integrated natural systems. Restore ecological functions of wetland systems where they have been degraded or destroyed.
Policy 4.8.6	Design new transportation and utility facilities to avoid interference with the natural operation of wetlands, and in a sufficient size and height to accommodate the movement and migration of wildlife through the area.
Policy 4.8.11	Reserve an upland buffer zone adjacent to wetlands, lakes, rivers, streams, springs and sinks as a water quality, quantity, and habitat protection buffer within which primary and secondary impacts to the wetland from activities such as drainage, filling, pesticide application, excavation, and construction are restricted. Define these buffer zones and the limits of all impacts to each feature's and buffer's function in a coordinated effort lead by local governments with assistance from the water management districts and the Departments of Environmental Protection and Community Affairs.
Goal 4.9	Maintain and enhance the habitat and populations of native species of plants and animals.
Policy 4.9.4	Encourage the use of native plants for landscaping.
Goal 4.10	Reduce or mitigate the loss of habitat for endangered or threatened species in the region.

Goal 4.11 Reduce the number of new development and redevelopments which adversely affect the environmental quality, physical character, or natural function of the region's exceptional geographic features and environmentally sensitive areas.

Policy 4.11.5 Development adjacent to preservation and conservation areas should be compatible with the purposes of those areas. Where needed, the more recent development should provide buffers for previously existing land uses.

Policy 4.12.5 Maintain reasonable public access at major lakes and rivers; choose new boat ramp locations that will minimize environmental disturbance.

Policy 4.12.8 Consider utility line rights-of-way and abandoned railroad rights-of-way for nature trails, bicycle paths, and wildlife passageways.

Policy 4.12.9 Retain public ownership and control of the Cross-Florida Greenway and use it for recreation, wildlife habitat, and for public purposes compatible with the foregoing.

Policy 4.12.10 Cooperate with other local governments, regional, and state agencies, and non-profit trail organizations to develop a region-wide hiking and bike path system that connects urban areas with rural recreational areas.

Policy 4.13.2 Cooperate with farmers and ranchers to encourage the use of best management practices in silviculture and agriculture to enhance wildlife habitat, conserve water, reduce erosion, and reduce the amount of pollutants entering the environment.

Conditions:

1) The applicant should engage the site design process to still further reduce the amount of impervious surface area created by the main plant and associated facilities. Action beyond minimum standards necessary for permit approvals is meaningful. Because of the quantity of mitigation options available, environmental resource permitting should coordinate mitigation planning and measurement efforts to ensure maximum protection for regional significant waters and water bodies.

2) Environmental resource permitting conditions should require all types of wetland mitigation to be comprehensively examined as part of a Wetland Mitigation Plan (WMP) accompanying development. Off-site action, including wetland mitigation banking, should be evaluated as one appropriate response to a range of impacts.

3) Water quality impacts may include change in surface drainage patterns, introduction of potential contaminants that have not been present in substantial volume with prior land uses, erosion and sedimentation impacts, and increased usage (with subsequent discharge) of chemical contaminants. The applicant should recognize potential for impact and cooperate with all other public and private stakeholders. Mitigation of regional water quality impacts should be coordinated between regulatory agencies and all interested public entities. Such action should be mandated through permitting to include general stakeholder participation in the watershed management process as much as those specific actions to meet the requirements of local government codes and planning initiatives like springs protection.

4) Impacts to the floodplain, resulting from development, should be mitigated through permitting to accomplish no net change in conditions related to the timing and magnitude of flood flows.

5) Proposed monitoring programs in coastal waters for thermal, water quality, aquatic ecosystem impacts or other individual and cumulative impacts stemming from project development should provide the information necessary to determine what, if any, impact plant construction and operation would have on the long-term economic viability of the region's aquaculture industry.

6) All impact monitoring data should be made publicly accessible when first available. If it can be demonstrated that mitigation approved through power plant certification are failing to safeguard the existing conditions necessary for regional aquaculture or preservation of regionally significant natural resources, then the applicant should cooperatively work with all parties to find new mitigation solutions.

7) Environmental resource permitting conditions should guide subsurface explorations adequate to ensure that sinkhole formation will not stem from changes in drainage or other conditions owing to project development.

8) Environmental resource permitting should require wildlife management planning sufficient to coordinate interface between regionally significant listed species and proposed facilities, to identify where impacts to listed species or habitat areas will occur, how monitoring of impact will happen, and to implement effective mitigation.

FINAL RECOMMENDATION

The goals and policies given above have organized final agency review for this portion of the application pursuant to the *Strategic Regional Policy Plan for the Withlacoochee Region.* The object of final agency review has been to determine if the site certification application for the main plant and associated facilities is consistent with the requirements of the SRPP. Having noted areas of prospective adverse impact and the economic benefits of construction, a final recommendation on this portion of this site certification application may be given.

WRPC Staff note again that electrical power generation plants are listed as having regionally significant status. Therefore, provided the applicant satisfies or exceeds the conditions given herein to maintain consistency with the SRPP, WRPC staff does not object to approval to locate the main plant and associated facilities at the subject location through promulgation of the *Florida Electrical Power Plant Siting Act.* Furthermore, the applicant requires no variance, exemption, exception, or other relief from this agency to proceed further in the certification process.

Staff very much appreciates the opportunity to participate in the process.

Thank you.

Sincerely,

Michael R. Moehlman
Executive Director
Withlacoochee Regional Planning Council

MRM/dpc

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Dwight Ganoe, Marion County Planning Department
Brad Cornelius, Sumter County Planning Department
Harold A. Horne, City of Dunellon
Cyndi Mulkey, Siting Coordination Office
Ann Seiler, Siting Coordination Office