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

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DEPARTMENT OF
ENVIRONMENTAL PROTECTION
NOV 12 2008
SITING COORDINATION

November 10, 2008

Mr. Mike Halpin, P.E.
Siting Coordination Office
Department of Environmental Protection
2600 Blair Stone Road MS-48
Tallahassee, Florida 32399-2400

SUBJECT: Preliminary Statement of Issues 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 compiled a preliminary statement of issues 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 likely be affected by the proposal. Final analysis may identify yet other SRPP goals and policies to be affected. Council staff writes this preliminary statement for the benefit of the public, the applicant and all interested parties to begin to define anticipated project impacts on the region's SRPP. WRPC staff may review the following topics to determine overall consistency between the proposed project and the region's SRPP:

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. A portion of the subject property abuts US 19, which has been designated a regionally significant hurricane evacuation route. Additionally, plant facilities would constitute vital infrastructure, making safety and security issues of interest to all localities within its vicinity. To maintain 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. The following SRPP goals and policies may 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.

Goal 5.8 Maintain adequate capacity on evacuation routes to complete movement of vulnerable populations prior to the onset of pre-landfall 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 directly east of US 19, and it is in the vicinity of SR 121 to the north and CR 40 to the south. All three roadways are regionally significant. Other transportation facilities such as pipelines, access or haul roads may be evaluated in reference to the SRPP as appropriate. In addition, there is potential for a rail spur to connect the nuclear plant to CSX's main line, whose system has regionally significant status under the SRPP.

Specifically, the spur rail line corridor crosses US 41 by the City of Dunnellon. US 41 is a regionally significant transportation facility. While the SRPP lends much support to a multi-modal approach to transportation demand, closer examination of how the spur rail line would cross US 41 may be warranted. Given its status as a regionally significant roadway, staff encourages the applicant to investigate all options to preserve existing quality and level of service along US 41. A grade separated rail crossing on US 41 could be an appropriate measure to promote road safety and mobility.

The impact of the plant on the land use/transportation relationship is relevant. WRPC staff may study impacts of trip generation, distribution or site access on regionally significant roadways to determine how project development will affect SRPP transportation goals and policies. Frequency of truck traffic or other independent characteristics will be reviewed as necessary to determine impacts. There may also be opportunities to link certain improvements to existing and planned regionally-scaled bicycle, pedestrian and multipurpose trail facilities.

The following SRPP goals and policies may 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.

3. Economic Development

Final agency review of the nuclear plant and appurtenant facilities will contrast adverse economic impacts to regionally significant resources, stemming from project development, against known benefits. 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. Accordingly, the SRPP prioritizes development of the region's eco-tourism industry as necessary for regional economic prosperity. In particular, regionally significant surface water bodies and coastal resources support eco-tourism. The region's substantial aquaculture industry also depends on the quality of Class II water bodies, which are by definition areas suitable for such activities.

Some project impacts have the capacity to negatively affect the region's natural resource based industries. To remain consistent with SRPP goals and policies, the applicant must demonstrate that negative impacts have been anticipated through proposed mitigation actions. In this context, the SRPP defines appropriate utilization for economic development purposes as action that does not compromise the availability of or quality of finite natural resources. Without mitigation, change of a magnitude sufficient to negatively impact the region's coastal waters, fisheries and aquaculture industries resulting from plant operations is inconsistent with the intent of the SRPP to preserve and sustain natural resources as regional economic assets.

However, the SRPP also names electrical power generation stations as a type of regionally significant facility, having positive economic impact. Therefore, determination of net impact shall be a function of all identified effects. Furthermore, when considering economic impact, plant outputs could serve as inputs to other industries. Therefore, co-location with complementary industries may represent a best-case economic outcome. The following SRPP goals and policies may 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 2.3.10 Increase intra-regional cooperation in attraction/expansion of industry dependant upon close proximity to one another or actual co-location.

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.

Goal 2.13 To appropriately utilize the region's natural resources (air, water, ecological communities, forests, etc.) for economic development.

Policy 2.13.1 Assess the availability, quality and economic potential of natural resources in local jurisdictions, utilizing the best available information from the federal, state and regional agencies, including the appropriate water management districts.

Goal 2.4 Increase employment and economic opportunities for the unemployed and economically disadvantaged in the region.

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.

4. Affordable Housing

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. Moreover, 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 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.

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 are impacts to regionally significant resources having designated conservation or protected status. Such areas serve vital natural system functions, where true mitigation of adverse impacts may or may not be possible.

Initial review indicates that the following regionally significant public lands may be located in the general vicinity of the subject location: The Marjorie Harris Carr Cross-Florida Greenway, Crystal River Preserve State Park, the Goethe State Forest, and the Waccasassa Bay Preserve State Park. Likewise, the project is near the following surface water bodies: the Withlacoochee River and Lake Rousseau. The Withlacoochee River is designated as Outstanding Florida Water (OFW). Coastal resources of regional significance—such as the Big Bend Aquatic Seagrasses Preserve and Class II waters—will be examined for possible impact. Impacts will need to be evaluated on a case-by-case basis for each of the resources listed previously. A system-wide approach to impact assessment would include aquifer and spring impacts.

Natural resource impacts during construction may stem from clearing of existing vegetation, grading, excavation, recontouring, alteration of natural drainage patterns, or addition of impervious surface area in the form of new roads and other improvements. The subject location contains regionally significant wetlands and floodplain. 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. Construction may also lead to disturbances off-site such as increased sediment yield. Assessment of plant operations would include evaluation of hydrological, thermal, air quality, water quality, and ecological impacts.

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 to original conditions remains possible. Consequently, from the SRPP's perspective, natural resource impacts of most concern are those which are unavoidable and cannot be mitigated. To achieve any consistency with the SRPP, the applicant must demonstrate that mitigation actions go beyond the minimum level necessary for permit approval.

The following SRPP goals and policies may apply:

Policy 4.2.8 Use water-conserving and water re-use processes and techniques in mining and other industrial processes.

Goal 4.3 Prevent further degradation and restore ground- and surface-water quality.

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| 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. |
| Policy 4.3.7 | In areas prone to sinkholes, protect groundwater from contamination through additional treatment of stormwater. Design surface water management systems in karst areas to avoid the collapse of retention and detention ponds. Prohibit untreated stormwater runoff from entering drainage wells and sinkholes directly connected to the Floridan aquifer. |
| Goal 4.4 | Maintain the integrity and natural value of floodplains, and manage floodplains through non-structural means. |
| Policy 4.4.5 | Follow natural hydrologic patterns for land drainage; prohibit land from being "reclaimed" by means of drainage activities. |
| Policy 4.4.8 | Require that new or re-built habitable structures have the lowest floor elevated above the 100-year flood level. |
| Policy 4.4.9 | Make structural alterations to natural bodies of water only where necessary to restore natural system functions. |
| Policy 4.4.13 | Limit incremental increases in the withdrawal of water to amounts which will leave adequate supplies for the healthy functioning of natural systems. |
| Policy 4.4.14 | Require new development to manage the rate, volume, timing and quality of wastewater and stormwater discharges to surface water and wetlands such that the ecosystem functions are maintained. |
| Goal 4.6 | Protect marine habitats from the adverse impacts of new development and redevelopment. |
| Policy 4.6.4 | Require construction sites to be managed to prevent sediment from becoming suspended in adjacent water bodies. |
| Policy 4.6.6 | Where unregulated industrial discharge of heated water occurs, do not cause substantial damage or harm to the aquatic life or vegetation in the receiving body of water or interfere with the beneficial uses designated for the classification assigned to those waters. |
| 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 4.8.7 Incorporate small isolated wetlands into surface water management systems where doing so would facilitate their preservation.

Policy 4.8.10 Require restoration where wetlands have been illegally impaired by drainage, dredge and fill, or other activities to provide an overall net environmental benefit.

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.

Policy 4.8.17 Control new development to prevent reduced floodway conveyance and increased flood elevations, velocity, sediment, and pollution load of 100-year flood waters.

Policy 4.8.18 Design new public and private roads so as not to impede the natural flow of water.

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.

Goal 4.14 Maintain the region's concentrations of all air pollutants for which standards have been established at levels less than the maximums allowed by state and federal standards.

Policy 4.14.1 Consider the cumulative effects of development on air quality during project review; implement mitigation measures where needed to avoid deterioration of the ambient air.

The goals and policies given above will organize final agency review of this portion of the application pursuant to the *Strategic Regional Policy Plan for the Withlacoochee Region*. The object of final agency review will be to determine if the site certification application for the main plant and associated facilities is consistent with the requirements of the SRPP. To that end, any final recommendations or conditions for approval will be stated.

Staff appreciates the opportunity to provide continuing input.

Thank you.

Sincerely,

David Connolly

David Connolly
Principal Planner
Withlacoochee Regional Planning Council

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