

**EXHIBIT I**  
**List of Bacchus Exhibits and References**

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- A. Bacchus, Ph. D., Curriculum Vitae
- B. Admitted Contentions for Proposed LNP/Board Memorandum and Order dated 7/8/09
- C. Description and Maps of Affected Area/Vicinity for Proposed LNP
  - 1. Excerpts from Ch. 2. Site Characteristics LNP Units 1 and 2, COL Application, Part 2, Final Safety Analysis Report (FSAR)
  - 2. Proposed LNP Affected Environment offsite facilities DEIS Fig 2-3
  - 3. Proposed LNP Operational Impacts springs Gulf DEIS Fig 5-3
  - 4. Proposed LNP Affected Environment Model Grid DEIS Fig 2-12
  - 5. Proposed LNP Affected Environment transmission footprint DEIS Fig 3-4
  - 6. Proposed LNP Affected Environment regional transmission corridors substations DEIS Fig 2-5
  - 7. Proposed LNP Topographic map 5 mile PEF Environmental Report Fig 2.7-23 7/30/08
  - 8. Proposed LNP Affected Environment 6-mile Land Use Site and Vicinity DEIS Fig 2-2
  - 9. Proposed LNP Affected Environment 6-mile DEIS Fig 2-4
  - 10. Proposed LNP 10-mile Griffin affidavit dewatering Fig 1
  - 11. Proposed LNP Affected Environment 20-mile natural resources DEIS Fig 2-17
  - 12. Proposed LNP Affected Environment sub-basins DEIS Fig 2-8
  - 13. Proposed LNP Affected Environment multibasin watersheds DEIS Fig 2-7
- D. Adverse Environmental Impacts from Altered Water Quantity and Quality from the Proposed LNP
  - 1. Law requiring Water Management Districts to establish minimum flows and levels for surface and ground water (373.042 F.S.)
  - 2. SWFWMD Minimum Flows and Levels already adopted-Board Approved 2010
  - 3. SWFWMD list of Minimum Flows and Levels (Environmental Flows) Priority List and Schedule
  - 4. Photograph of giant 100-foot deep hole in ground excavated for nuclear power plant 11-12, 2010
  - 5. FDEP Intent to Issue Tarmac King Road Mine Permit dated 6/18/10
  - 6. FDEP permit for excavation of cooling tower canal issued 3/11/10
  - 7. Bacchus peer-reviewed dewatering publication 2006
  - 8. Groundwater connections to navigable waters - U.S. v. Banks (873 F.Supp. 650)
  - 9. SWFWMD confirmation that Groundwater Basin Resource Availability Inventory (GWBRAI) was not considered during hydrology model review for proposed LNP
  - 10. Bacchus peer-reviewed wildfire publication 2007
- E. Adverse Environmental Impacts from Airborne Deposition of Salt and Other Contaminants from the Proposed LNP
  - 1. 514 tons/yr particulate matter (PM) emissions from proposed LNP – BACT Determinations (Section 4, Appendix D, Florida DEP Conditions of Certification)
  - 2. 11/9/10 email from Douglas Bruner, NRC project mgr, providing location of Tampa climatology data
  - 3. Cover Classification Map for South Levy/North Citrus Counties (based on SWFWMD 2006 Lev3, FLLUCSDESC)
  - 4. NOAA Tampa data used in PEF's climatological model showing no rainfall for entire month
  - 5. NOAA data showing 10/10 as driest month on record in Chiefland and other areas
- F. Unpermitted "Taking" of Endangered and Threatened Species
  - 1. WAR photos of CFBC springs and 9/23/10 DEIS comments
  - 2. Bacchus coastal impacts to listed species paper 2006
  - 3. Save the Manatee case regarding manatee population using the CFBC

- G. Avoidance - Alternatives Not Considered or Inadequately Assessed
  - 1. Rooftop Solar PV - Florida Solar Energy Center - “no-build” alternative
  - 2. Rooftop Solar PV - California Solar Energy Center - “no-build” alternative
  - 3. Decoupling “no-build/conservation” alternative
- H. No Bona fide Comprehensive Cumulative Effects Analysis Conducted
  - 1. 1997 Cumulative Effects Report Synopsis:  
Council on Environmental Quality. 1997. Considering Cumulative Effects Under the National Environmental Policy Act. Executive Office of the President; What are Cumulative Impacts? Synopsis of the U. S. Council on Environmental Quality
  - 2. Bacchus preliminary comments dated 10/26/10 on proposed LNP DEIS
  - 3. Bacchus original affidavit comments dated 2/6/09 on proposed LNP DEIS
- I. List of Bacchus Exhibits and References

### References

- Bacchus, S. T. 2006. Nonmechanical dewatering of the regional Floridan aquifer system. pp. 219-234 *in*: R.S. Harmon and C. Wicks (eds.) Perspectives on karst geomorphology, hydrology, and geochemistry – A tribute volume to Derek C. Ford and William B. White. Geological Society of America Special Paper 404
- Bacchus, S. T. 2007. More inconvenient truths: Wildfires and wetlands, SWANCC and Rapanos. National Wetlands Newsletter 29(11):15-21.
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- Heung, W. and R. Gobin. 2010. A Case History of Construction Induced Sinkholes. In: Proceedings of GeoFlorida 2010: Advances in Analysis, Modeling & Design (GSP 199), p. 727.
- Grey, W.F. and W.M. Dennis. 1995. Aerial Photographic Monitoring, Florida Power Corporation, Crystal River Power Plant Salt Drift Study. Final Report 1994 Aerial Photography, Submitted to Florida Power Corporation, St. Petersburg, FL, APPENDIX A
- KBN Engineering and Applied Sciences, Inc. 1995. Crystal River Salt Drift Study 1993-1994 Annual Report, May 1995. Prepared for Florida Power Corporation, St. Petersburg, FL.
- LNP Units 1 and 2, COL Application, Part 2, Final Safety Analysis Report (FSAR), Chapter 2. Site Characteristics, 1006 pp.
- Moser, B.C. 1979. Airborne salt spray – Techniques for experimentation and its effects on vegetation. Symposium on Particulates. Phytopathology 69(9):1002-1006.
- Swancar, A., T.M. Lee and T.M. O’Hare. 2000. Hydrogeologic setting, water budget, and preliminary analysis of ground-water exchange at Lake Starr, a seepage lake in Polk County, Florida. U.S. Geological Survey Water-Resources Investigations Report 00-4030. 65 pp.
- US Nuclear Regulatory Commission and US Army Corps of Engineers. 2010. Draft Environmental Impact Statement for Combined Licenses (COLs) for Levy Nuclear Plant Units 1 and 2, NUREG-1941 Vol. 1, 740 pp. and 2, 742 pp.