

PMTurkeyCOLPEm Resource

From: Mark_Lewis@nps.gov
Sent: Monday, June 01, 2009 10:51 AM
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Subject: FPL gets tentative OK for rock mining
Attachments: FPL Rock Mining Tentative Approval.doc; MD BCC Ltr - FPL Rock Mine 05-19-09.pdf

The issue of rock mining adjacent to Biscayne National Park, to provide fill material for FPL expansion at Turkey Point, was discussed by the Miami-Dade County Commission last Thursday. The Commission voted to send the proposed Comprehensive Development Plan amendment to the state Department of Community Affairs. Attached is a Miami Herald article as well as a letter Biscayne National Park submitted to the Commission.

Mark

(See attached file: FPL Rock Mining Tentative Approval.doc) (See attached file: MD BCC Ltr - FPL Rock Mine 05-19-09.pdf)

Mark Lewis
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Biscayne National Park
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As the largest marine park in the National Park System, Biscayne National Park protects mangrove forests, clear bay waters, the northernmost Florida Keys and over twenty miles of coral reef. Learn more at www.nps.gov/bisc

The National Park Service cares for special places saved by the American people so that all may experience our heritage.

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FPL gets tentative OK for rock mining near Biscayne Bay

BY MATTHEW HAGGMAN
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[HTTP://WWW.MIAMIHERALD.COM/NEWS/MIAMI-DADE/BREAKING-NEWS/STORY/1070750.HTML](http://www.miamiherald.com/news/miami-dade/breaking-news/story/1070750.html)

Miami-Dade commissioners on Thursday kept alive Florida Power & Light Co.'s bid to dig rock pits less than two miles from Biscayne Bay to provide landfill for two new nuclear reactors planned at Turkey Point.

But several commissioners who voted in support said a host of questions must be answered before they give final approval this fall.

For now, their decision sends the proposal to Florida's Department of Community Affairs for further review before the final county commission vote.

FPL is asking for a zoning change that would open agricultural land to mining in a coastal area east of Homestead Air Reserve Base. A range of critics -- including farmers, environmentalists and Biscayne National Park officials -- oppose the plan because it could increase saltwater intrusion from the bay and jeopardize both farmland and drinking water wells.

The energy company is seeking the change because it can obtain the fill for the expanded nuclear plants more cheaply by mining it in the South Miami-Dade coastal area instead of shipping it in from elsewhere.

Commissioners Barbara Jordan and Katy Sorenson said the plan posed risks to the county's drinking water and should be rejected now without further review. Yet they were on the losing side of an 8-2 vote.

Voting yes were Chairman Dennis Moss and commissioners Dorrin Rolle, Jose "Pepe" Diaz, Carlos Gimenez, Sally Heyman, Rebeca Sosa, Joe Martinez and Javier Souto. Audrey Edmonson, Bruno Barreiro and Natacha Seijas were absent.

Still, Moss said three questions must be answered before a final OK comes. "One, is there a real benefit to the public in approving this? Two, is there no impact to the water supply? Three, that this doesn't open up additional rock mining in the area."

FPL said lower costs by obtaining fill in the South Dade coastal areas -- rather than the higher costs of trucking it in -- will mean lower electricity prices for consumers down the road. The company also contends it can turn the quarries into reservoirs that deliver important environmental benefits.

Yet a utility representative admitted that the company isn't sure the mining plan is environmentally feasible.

"If it's not, we won't do it," said Steven D. Scroggs, FPL's senior director of project development.

Critics responded by asking why a plan with so many question marks is even being considered. Critics also assert the rock mining will impede Everglades restoration.

FPL has already won approval from Miami-Dade leaders to build two new nuclear reactors at Turkey Point, located in the southern unincorporated part of the county. The energy company still needs state and federal approvals for the reactors, which it hopes to open starting in 2018.



United States Department of the Interior

National Park Service
Biscayne National Park
9700 S. W. 328th Street
Homestead, Florida 33033-5634



IN REPLY REFER TO:
L-76

May 19, 2009

The Honorable Dennis Moss
Chairman, Board of County Commissioners
Miami-Dade County
111 NW. First St., Suite 1210
Miami, Florida 33128-1902

Chairman Moss:

Biscayne National Park would like to share our concerns regarding the proposed Comprehensive Development Master Plan (CDMP) Amendment which would allow rock mining in agriculture lands in southern Miami-Dade County. The park's concerns rest entirely on environmental questions which we feel have not been adequately addressed, and which have the potential to affect Biscayne National Park. This CDMP Amendment requested by Florida Power and Light Company (FPL), would appear to provide prior approval to projects which may have impacts to Biscayne Bay and the park into perpetuity. It appears that the only safeguard in this proposed Amendment is the requirement that the mining follows "best available technologies". This proposed Amendment presumes that technologies are available which mitigate for the impacts. We are very concerned that this presumption has yet to be proven.

The coastal wetlands, the bay itself, and the nearshore waters of Biscayne National Park currently suffer from an acute lack of freshwater flow, resulting in the loss of estuarine conditions and a substantial reduction in the health of species requiring estuarine conditions during portions of their life cycles. Many of these are the fish species valued by both the recreational and commercial fishing industry. Additionally, there is currently a lack of understanding of the impacts to the hydrology and health of Biscayne Bay by the existing cooling canals of the FPL site at Turkey Point. Agencies, including Miami-Dade County, the South Florida Water Management District, the U.S. Geological Survey, the National Park Service, and others are just now beginning to appreciate the hydrological impacts of these cooling canals on the Bay. Biscayne National Park suggests that the accumulated impacts of the cooling canals and other water management practices should be better understood before activities such as those proposed by this Amendment request this should be permitted to proceed without

the case by case review process currently provided by the CDMP.

We believe there are significant technical issues to be resolved before we can be confident that the rock mining proposed by this Amendment application will not harm the wetland communities and bay waters. We are very concerned that this CDMP Amendment, if approved, would reduce the likelihood of these issues being thoroughly explored prior to the activity being allowed, as there does not appear to be any requirement in the Amendment request for that type or degree of review. We are specifically concerned about the impacts on groundwater flow to the Bay, wildlife habitat, water quality, water availability and the movement of the saltwater intrusion line. Our detailed concerns are as follows:

- We are concerned that the technology currently available may not be sufficient to provide adequate lining of a rock mine of the depths and dimensions being considered, in order to prevent infiltration into the mine by surrounding Biscayne Aquifer water. This is an extremely important concern, because if a lining were to fail, or to perform inadequately, a rock mine of these dimensions would cause extensive evaporative loss of water from the Biscayne Aquifer, which has already been identified as overstretched in providing water for both environmental restoration and urban water supply. It is important that the analysis of a project of this type and magnitude should be done in conjunction with adjacent projects to determine the proposed project's cumulative impact on water withdrawal and freshwater availability. The park is not aware of any projects of this size and scope where lining to separate the rock mine contents from the surrounding aquifer has been successful.
- Until it can be determined that the rock pit can be successfully lined, we suggest that groundwater-surface water modeling is needed to fully determine the effects of evaporation from the rock mine on the availability of water and on the movement of the saltwater intrusion line. We are concerned that building a large rock mine in this area may increase the westward movement of the saltwater intrusion line in an area already impacted, and thus affect water availability for the Bay and the urban water supply.
- While lining of a rock pit is essential in order to prevent evaporative loss from the Biscayne Aquifer, we are concerned that the ability to use water for environmental restoration from the lined pit, of the depths being considered, has not been adequately analyzed. In tropical areas, waters in lakes tend to stratify thermally and chemically due to constant, relatively high temperatures. Stratification results in poor water quality such as anaerobic and even methanogenic conditions which would make the water unavailable for use for restoration purposes. This issue of water quality in lined storage areas has been brought up in CERP discussions but has not been thoroughly investigated.
- While lining of a rock pit is essential, as explained above, we are also concerned that the size and depth of such a large lined rock pit will significantly impact current water flow from the northwest toward the

bay. A lined rock pit of this size and depth would seem to serve as a very large “boulder in the stream” and could actually impede freshwater from getting to this sensitive coastal zone. We believe these hydrological impacts should be carefully analyzed.

- We are concerned that the proposed language could extend the right to excavate rock mines for public projects to additional land owners in the area. The wording of the Amendment application includes all lands east of SW 122 Ave and could potentially result in rock mines being dug right to the boundary of Biscayne National Park. The agricultural lands and wetlands immediately west of the park are part of a greater ecosystem that extends to the open waters of the Bay. Removing fill from this area will result in a significant loss of spatial extent of habitat. We believe that this type of potentially significant impact to the national park would warrant a thorough, case by case analysis, rather than the broad level of approval derived from a CDMP Amendment.
- This Amendment proposal requires that any project authorized through this process must be a beneficial water management project as determined by the County, in consultation with the South Florida Water Management District and the Army Corps of Engineers. The National Park Service, as the downstream recipient of the intended ecological restoration, is totally ignored in this process. We believe the National Park Service could have very significant and critical information related to any project authorized by the Amendment, should it be approved.

We are very concerned that this Amendment would allow permanent and irreversible processes to move forward with extremely inadequate evaluation of the environmental impacts, so long as “best available technologies” are used. These impacts have the potential to cause significant harm to the hydrology and wetlands of the coastal estuaries and Biscayne National Park. The only way to determine if these impacts are minimal or can be effectively mitigated is by a thorough environmental analysis, which this CDMP Amendment seeks to preclude.

Sincerely,



Mark Lewis
Superintendent

cc:

Everglades National Park
USEPA
USACOE
SFWMD
FDEP
Miami-Dade DERM