

## TurkeyPoint34SLRPEm Resource

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**From:** Eaton, Kristin <Kristin.Eaton@fpl.com>  
**Sent:** Monday, June 10, 2019 3:36 PM  
**To:** Nester, Lindsay  
**Cc:** Grange, Briana; Eldridge, Jodie  
**Subject:** [External\_Sender] RE: [EXTERNAL] Turkey Point Crocodile Injury and Mortality Data

Hi Lindsay,

Below are some additional edits (red) and comments (green) on the T&Cs and the conservation measures. I've also included the indigo snake minimization measures. Please let us know if you'd like to discuss.

T&Cs:

1. Continue crocodile nest and hatchling monitoring at Turkey Point for the duration of the NRC's licensed operations for the life of the license, or unless otherwise agreed upon by FPL, the Service, the NRC, and any relevant researchers. Every two years, FPL, the Service, the NRC, and any relevant researchers will meet to discuss the monitoring methods and the need for continuation.  
**Comment: We made changes to the "for the life of the license" language to ensure this condition would cover the current license and the subsequent renewed license period. I also added the same language that's in the health surveys (Conservation measures #2 below) for consistency. As it reads now, the surveys would need to continue unless changes were made and agreed upon and while the NRC operating licenses for Units 3 and 4 are in place. We also removed "relevant researchers" since the parties to this BiOp are the NRC, FWS and FPL. We generally don't have our consultants or researchers called out in a permit document. This does not prevent FPL, NRC and FWS from bringing researchers into the discussion. It does, however, keep the approvals to the relevant parties of the BiOp.**
2. Continue to conduct employee training for crocodiles and eastern indigo snake awareness and posts educational signs around the plant.

Minimization and conservation measures:

1. Continue salinity and temperature monitoring program within Turkey Point and in Biscayne Bay as required by the Florida Department of Environmental Protection (Industrial Wastewater Permit and Consent Order) and Miami-Dade County (Consent Agreement).
2. Continue the crocodile health and condition surveys, for the duration of the NRC's licensed operations for the life of this renewed facility operating license or unless otherwise agreed upon by FPL, the Service, the NRC, and any relevant researchers. Every two years, FPL, the Service, the NRC, and any relevant researchers will meet to discuss the monitoring methods and the need for continuation.  
**Comment: Same comment as T&C #1 above.**
3. Crocodile data will follow the standard approved management method. Data will be kept in the approved format.
4. Continue following ~~the Habitat Management Plan and~~ the Nutrient Management Plan as required by the Florida Department of Environmental Protection (Industrial Wastewater Permit and Consent Order) and Miami-Dade County (Consent Agreement).  
**Comment: FPL does not have a Habitat Management Plan, only a Nutrient Management Plan required by the consent order/agreement. The Crocodile Management Plan speaks to maintenance of crocodile habitat on the site so that aspect would be covered by #5.**
5. Continue to follow the most current version of FPL's Crocodile Management Plan.

Indigo Snake Minimization Measures:

1. Continue to provide indigo snake awareness training to all employees and contractors working at the site.
2. Place indigo snake awareness signs in areas where maintenance activities will occur.
3. Provide an indigo snake observer when maintenance activities are occurring near vegetation piles where indigo snakes are likely to be present.
4. Remove (burn) vegetation piles as quickly as possible to reduce opportunities for the snakes to use the vegetation as habitat.

Thanks,

Kristin

**From:** Nester, Lindsay [mailto:lindsay\_nester@fws.gov]  
**Sent:** Friday, May 31, 2019 3:41 PM  
**To:** Eaton, Kristin  
**Cc:** Grange, Briana; Eldridge, Jodie  
**Subject:** Re: [EXTERNAL] Turkey Point Crocodile Injury and Mortality Data

Great! Thanks Kristin!

On Fri, May 31, 2019 at 3:21 PM Eaton, Kristin <[Kristin.Eaton@fpl.com](mailto:Kristin.Eaton@fpl.com)> wrote:

Hi Lindsay,

We're going to circulate the changes internally and get back to you next week, along with the indigo snake minimization measures. Have a good weekend!

Thanks,

Kristin

**From:** Nester, Lindsay [mailto:[lindsay\\_nester@fws.gov](mailto:lindsay_nester@fws.gov)]  
**Sent:** Thursday, May 30, 2019 3:12 PM  
**To:** Eaton, Kristin  
**Cc:** Grange, Briana; Eldridge, Jodie  
**Subject:** Re: [EXTERNAL] Turkey Point Crocodile Injury and Mortality Data

I moved these two bullets to the **terms and conditions** as we discussed.

1. Continue crocodile nest and hatchling monitoring at Turkey Point for the life of the license. Every two years, FPL, the Service, the NRC, and any relevant researchers will meet to discuss the monitoring methods and the need for continuation.
2. Continue to conduct employee training for crocodiles and eastern indigo snake awareness and posts educational signs around the plant.

I updated the **minimization and conservation measures** to the following

1. Continue salinity and temperature monitoring program within Turkey Point and in Biscayne Bay as required by the Florida Department of Environmental Protection (Industrial Wastewater Permit and Consent Order) and Miami-Dade County (Consent Agreement).
2. Continue the crocodile health and condition surveys for the life of this renewed facility operating license unless otherwise agreed upon by FPL, the Service, the NRC, and any relevant researchers. Every two years, FPL, the Service, the NRC, and any relevant researchers will meet to discuss the monitoring methods and the need for continuation.
3. Crocodile data will follow the standard approved management method. Data will be keep in the approved format.
4. Continue following the Habitat Management Plan and the Nutrient Management Plan as required by the Florida Department of Environmental Protection (Industrial Wastewater Permit and Consent Order) and Miami-Dade County (Consent Agreement).
5. Continue to follow the most current version of FPL's Crocodile Management Plan

Does this look good to everyone?

On Thu, May 30, 2019 at 8:58 AM Eaton, Kristin <[Kristin.Eaton@fpl.com](mailto:Kristin.Eaton@fpl.com)> wrote:

Hi Lindsay,

Below is the proposed language for the conservation measures for the water quality monitoring and crocodile surveys. Please let us know if you have any questions or would like to discuss.

Water quality monitoring:

Currently, FPL holds operating permits and regulatory agreements to monitor temperature and salinity in the CCS and Biscayne Bay which are administered by the Florida Department of Environmental Protection

(Industrial Wastewater Permit and Consent Order) and Miami-Dade County (Consent Agreement). These permits and agreements also include the Nutrient Management Plan. FPL will continue to comply with the current requirements, recognizing that they are subject to modification in the future.

Crocodile surveys:

FPL was required by the Florida Fish & Wildlife Conservation Commission (FWC) to conduct surveys pre- and post- Unit 3 and 4 Uprate to determine any effects of temperature and salinity changes on crocodiles in the CCS (COC No. XVII.B.1). Since FPL started surveys in 2009, changes have been made to the survey protocol throughout the monitoring period and were submitted to FWC. For example, in 2016, the FWS requested FPL continue the existing surveys and add health surveys and monitoring in Biscayne Bay. Again, in 2019, FWS requested FPL continue to conduct all of these surveys. FPL will continue to conduct the surveys and will meet every 2 years with all relevant parties to discuss monitoring methods and the need for continuation of the surveys.

Thanks,

Kristin

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**From:** Nester, Lindsay [mailto:[lindsay\\_nester@fws.gov](mailto:lindsay_nester@fws.gov)]  
**Sent:** Tuesday, May 14, 2019 9:48 AM  
**To:** Grange, Briana  
**Cc:** Eldridge, Jodie; Eaton, Kristin  
**Subject:** Re: [EXTERNAL] Turkey Point Crocodile Injury and Mortality Data

CAUTION - EXTERNAL EMAIL

Thanks Briana. I'm ready to submit the draft BO for supervisor review when I get the conservation measures. I will also send the BO to you for review at that time.

On Tue, May 14, 2019 at 9:34 AM Grange, Briana <[Briana.Grange@nrc.gov](mailto:Briana.Grange@nrc.gov)> wrote:

Lindsay,

Attached you will find a table of crocodile injuries and mortalities at the Turkey Point site reported to the NRC from 2005 through present. You had requested this information during our April 18, 2019, teleconference. FPL has reviewed and confirmed the accuracy of the information in the table. Please note while there have only been 8 causal injuries or mortalities, I have included non-causal injuries and mortalities reported to the NRC as well for your awareness. The two categories of discovery are identified and clearly separated in the table. Injured or dead crocodiles unassociated with plant operations are left in place where they are found (often in the interceptor ditch). Thank you,

Briana

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**Briana A. Grange**

Conservation Biologist

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Lindsay Nester

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**Sent Date:** 6/10/2019 3:35:39 PM  
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**From:** Eaton, Kristin  
**Created By:** Kristin.Eaton@fpl.com

**Recipients:**  
"Grange, Briana" <Briana.Grange@nrc.gov>  
Tracking Status: None  
"Eldridge, Jodie" <Jodie.Eldridge@nexteraenergy.com>  
Tracking Status: None  
"Nester, Lindsay" <lindsay\_nester@fws.gov>  
Tracking Status: None

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