

SUBMISSION BY
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Oral presentation to NRC
Plantation Inn
Crystal River, FL

My name is Dan Hilliard and I represent the views of the Withlacoochee Area Residents, Inc., a 501.C3 corporation founded in 1984. The organization's primary interest is water management and protection of our most valuable resource. We are based in Inglis, Florida.

After review of the Draft we were puzzled to find NRC attributes ^{IDENTIFIES a geographically narrow} ~~small~~ ^{scope of} impacts ^{as} to surface waters related to the intake of cooling water in the Cross Florida Barge Canal.

The Draft mentions a priority set by the Withlacoochee Basin Board to restore Lake Rousseau and the Lower Withlacoochee River, but apparently does not acknowledge such objectives will necessitate restoring the hydrologic connection between the severed segments of the Lower River. Site location of the CWIS as proposed by the Applicant will substantially obstruct such action.

The Draft mentions proposed water withdrawal from the Withlacoochee River watershed. It does not examine cumulative impacts which will result from the Applicant's diversion of fresh water resources and the state's obligation to provide water supply to the very development which provides the basis of need for this power plant.

Draft Section 5.2 recognizes Florida's Clean Water Act Section 401 certification for this project, yet it is not clear to us this is justified. There is no information submitted by the applicant that addresses diversion of fresh water from coastal estuaries and the attendant modification of inshore water chemistry which will result. Such impacts will directly increase average salinity in the lower reaches of the Withlacoochee River, Withlacoochee Bay, and by extension adjacent

by construction of the Cross Florida Barge Canal. In large part, the present bifurcation of the Lower River is the basis of need for the restoration priority set by the Basin Board.

It is not clear the Commission understands fresh water supply source locations within the Canal as we do, or what quantity of supply may be provided by springs within the canal. We are providing information about substantial spring flows in the Canal that are apparently not addressed by the Applicant or Draft. Although the Applicant and Draft repeatedly represents the source of cooling water for the plant as the Gulf of Mexico, in fact the majority supply will be fresh water contribution from springs in the Canal and leakage from the Inglis Dam. The questions unresolved at this point are what quantity of fresh water will actually be diverted for cooling water and what impacts, both environmental and economic, will follow. We ask if the chosen site location for the CWIS is so necessary that it may usurp rational water management practices.

We have prepared a lengthy written submission which is presented in 5 copies for review by the Commission and other interested authorities. The text is supplied in printed form, and on the computer discs which also include all reference material, with exception of the COLA and Draft EIS. We believe the Commission has the statutory authority and responsibility to review these issues in a more comprehensive manner than has been represented in the Draft. The issues at hand have both environmental and economic impact that will prevail over the life of the plant. They are worthy of consideration in our opinion, as are the alternatives discussed within the submitted documents.

Thank you for your consideration.

/dch/ for WAR, Inc.