

March 8, 2016

Laura Reynolds

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Representing Southern Alliance for Clean Energy

**Re: Full Prepared Comments on Item 2B1 (COOLING CANAL STUDY AT THE FLORIDA POWER AND LIGHT TURKEY POINT POWER PLANT DIRECTIVE 151025) to the Miami-Dade Board of County Commissioners**

Thank you Commissioner Sosa for requesting this study be done, it conforms everything your staff has been working on.

This Study Confirms that FPL MIS-predicted or MIS-calculated the impact uprating the system to generate more power would cause. So this self-inflicted emergency has caused uncontrollable temperatures and an algal bloom and very high salinities---and their self-prescribed remedy for this emergency sanctioned by the Department of Environmental Protection and the South Florida Water Management has now moved that plume into the surface waters of a National Park further violating the law.

Why we can't make FPL **DOWNRATE** this system to bring it back into balance? They continue to make record profits while our water supply gets loaded with 600,000 pounds of salt daily and our national park is polluted.

We ask you not to allow them to use one more drop of L-31 water, make them find a sustainable source of make-up water for the 60 Million Gallons a day they evaporate

We will be providing comments on the study itself as it does not take all of the available information and data into account.

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In addition I wanted to thank Commissioner Cava for requesting Dade County to take a look at all the new data coming in, that was a condition of your L-31 Permit--you may have received a copy of this last night after 5pm--although I wish I would have had more time to review this document I am glad to have the information now.

But in case you missed that I am sure you didn't miss the front page of the newspaper...

**It's important all of you recognize the importance of this moment.**

The Administrative Law Judge came out with a ruling recently that clearly shows that the Department of Environmental Protection (DEP) has abandoned its responsibility as a regulatory body.

**Unless the County takes action today there is nobody to protect our waters---our Drinking water and our National Park.**

The Federal Government has delegated their authority to the state---and if they are willing to continue to let clear violations persist then it is up to this body to make sure the laws of the land are upheld.

And that is in Dade County's best interest, I provided you the ruling so you can see just how strong Judge Canter calls out DEP.

**So what do we do? This can't continue.**

If FPL is really interested in doing the right and being a responsible cooperate citizen as they claim to be:

**They must deal with the root cause of the problem here:**

- 1) **Abatement**-Employ the latest new cooling technology---like cooling towers that can make better use of available water and shut down the antiquated Cooling Canal System which will never work and will continue to load salt into our aquifer daily if we allow it to continue to operate
- 2) **Remediate**-require down rating of the system until compliance is met and pollution is under control, during this time expand monitoring and analysis of the extent of the damage to the surrounding area to monitor progress
- 3) **Mitigate**-Require FPL to find a sustainable source of make-up water and allow flowage easements on all 5,000 acres of the surrounding lands to bolster Biscayne Bay Coastal Wetlands and Everglades Restoration that we are already spending billions of dollars on

Then be sure you send a package of information to the EPA and DOI (Department of Interior) with a companion letter from this board urging immediate action and oversight.

It is so important you issue a New Notice of Violation on the surface water violations and under your current Consent Decree they are in violation of that enforcement document as well. And you should consider taking FPL back to court to bring them into compliance.

Paragraph 14 of the October 7, 2015, Consent Agreement states:

“This Consent Agreement requires FPL to take action to address the County's alleged violations of County water quality standards and criteria in groundwater outside the CCS as descr5ibed in the NOV. As part of these actions, this Consent Agreement also requires FPL

to take into account its efforts to improve CCS water quality and the potential and actual impacts of such actions on water resources outside the CCS, to not cause or contribute to ....(ii) future violations of County water quality standards or criteria in the groundwaters or surface waters outside the CCS.”

Paragraph 29 of the Consent Agreement states DERM reserves all its rights to initiate legal action to prevent or prohibit future violations of applicable laws, rules and ordinances.

**If you don't act to protect our resources nobody will.**

Thank you for your immediate attention to these very important issues.

A handwritten signature in green ink that reads "Laura Reynolds". The signature is written in a cursive, flowing style.

Representing Southern Alliance for Clean Energy

Former Executive Director of Tropical Audubon Society