

Audubon of the Western Everglades • Audubon Society of the Everglades • Ecology Party of Florida • Florida Keys Environmental Fund • Florida Wildlife Federation • Friends of Arthur R. Marshall Loxahatchee National Wildlife Refuge • Friends of the Underline • Hendry-Glades Audubon • Izaak Walton League of America, Florida Division, Cypress Chapter and Florida Keys Chapter • Miami Waterkeeper • National Parks Conservation Association • Ocean Research and Conservation Association, Inc. • Sierra Club Loxahatchee Group • Southern Alliance for Clean Energy • Suncoast Waterkeeper • Tropical Audubon Society

May 22, 2015

Cindy Bladey
Chief, Rules, Announcements, and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-000

Megan Clouser
Project Manager
U.S. Army Corps of Engineers
Miami Permits Section
9900 SW 107th Ave., Ste. 203
Miami, FL 33176

Re: NRC-2009-0337 Turkey Point Expansion

Dear Ms. Bladey and Ms. Clouser,

On behalf of the undersigned environmental organizations representing hundreds of thousands of citizens throughout the country, we submit these comments in opposition to the proposed Turkey Point Power Plant expansion. Our groups and members are deeply committed to protecting the environmental health of South Florida and our precious freshwater supply. We have serious concerns that the proposed expansion of Turkey Point could significantly impact the health of our national parks, sensitive ecological areas, federally listed threatened and endangered wildlife, and the quality and quantity of our water resources.

Turkey Point is located within six miles of two biologically rich natural parks, a state aquatic preserve, a national wildlife refuge, and a wetland habitat preserve. Everglades National Park is recognized as a UNESCO World Heritage Site and an International Biosphere Reserve and supports a unique array of ecosystems and wildlife. Biscayne National Park, located directly adjacent to Turkey Point, is one of our largest marine national parks, and home to incredible biodiversity and important marine and wetland habitat. These natural areas offer critical protection to sensitive ecosystems, wildlife, and unique habitat and support the local economy through recreational opportunities, tourism and the provision of ecological goods and services. Biscayne and Everglades National Parks alone generate nearly \$200 million of economic output from 1.6 million annual visitors. According to the standards of the Nuclear Regulatory Commission (“NRC”), “sites adjacent to lands devoted to public use may be considered unsuitable,” and unacceptable impacts are “most apt to arise in areas adjacent to natural-

resource-oriented areas.”¹ According the NRC’s own standards, Turkey Point should not be expanded due to the potential for unacceptable impacts to the ecological health and economic viability of surrounding protected areas.

Furthermore, we are concerned that the operation of two new nuclear reactors could have significant impacts on the quantity and quality of our limited freshwater resources. Maintaining South Florida’s water supply is critical to ensuring the future of our environment and our communities. We are concerned that withdrawing massive amounts of freshwater from underneath Biscayne Bay could increase salinity levels within Biscayne National Park and hasten saltwater intrusion into freshwater resources. Furthermore, South Florida is vulnerable to the impacts of climate change, including storm surge, sea level rise, and increased incidents of other types of flooding. Expanding a nuclear power plant in an area that is ground zero for sea level rise threatens our communities and the environment, especially if large amounts of spent nuclear fuel are stored on-site.

In the interest of protecting the health and integrity of our valuable natural resources and limited water supplies we strongly recommend that you do not permit the proposed Turkey Point Power Plant expansion.

Sincerely,

(Signatures waived to expedite delivery)

Alan Keller

Chair, Conservation Committee
Audubon of the Western Everglades

Paton White

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Audubon Society of the Everglades

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¹ U.S. Nuclear Regulatory Commission, *Regulatory Guide 4.7- General Site Suitability Criteria for Nuclear Power Stations*, Revision 2, 1998, Section C.

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