



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

6620 Southpoint Drive, South  
Suite 310  
Jacksonville, Florida 32216-0912

IN REPLY REFER TO:

February 27, 2006

Ms. Mary Anne Helton, Attorney  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, Florida 32399-0872

Re: Final Draft of the "Florida Public Services Commission's Staff Recommendations to the Commission Internal Affairs, System Hardening"

Dear Ms. Helton:

The U. S. Fish and Wildlife Service (Service) reviewed the Final Draft of the "Florida Public Services Commission's Staff Recommendations to the Commission Internal Affairs, System Hardening" and would like to offer the following comments:

The Florida manatee has come to depend upon Florida's power plants as a place of refuge during the winter. The power plant discharges provide about 2/3 of Florida's population of this endangered species with important habitat, habitat without which they will not survive.

While the hurricane season is generally over well in advance of the winter season, the long-term loss of power plant operations due to a hurricane seriously crippling a power plant could have a significant, catastrophic, effect on manatees known to use these sites. In the absence of warm water from power plants disabled by hurricanes, manatees will be exposed to cold weather extremes and may die as a result of this exposure. A contingency plan is needed to ensure that steps are in place to protect manatees from the loss of warm water.

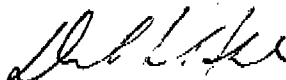
In addition to the loss of warm water, manatees may be affected by hurricanes through other venues. Studies are currently taking place to assess the effect of hurricanes on manatees. One study has identified hurricane-related decreases in survival rates and another study seeks to assess the effect of hurricane-related fuel spills on manatees. Both studies are important to assessing manatee response to hurricanes and our ability to respond to these events.

While human safety is of paramount concern in regard to hurricanes, the protection of endangered species such as the manatee from these events is also a sensitive issue. The Service recommends,

Post-it® Fax Note	7671	Date	2/28/06	# of pages	2
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From	JIM VALADE				
Co.	U.S.F.W.S.				
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therefore, that system hardening plans include measures to assess and protect manatees dependent upon the continued operation of Florida's power plants. Please contact Jim Valade at 904 232-2580 ext 118 (or [Jim\\_Valade@fws.gov](mailto:Jim_Valade@fws.gov)) if you have any questions or concerns with regard to this recommendation. Many thanks for the opportunity comment upon this important issue.

Sincerely,



David L. Hankla  
Field Supervisor