



February 1, 2008

Mr. David E. Anderson
Executive Director
Audubon of Florida
444 Brickell Avenue
Suite 850
Miami, FL 33131

Dear Mr. Anderson,

On behalf of FPL's Environmental Services Department, I would like to thank you for your input regarding FPL's proposed wind energy facility on Hutchinson Island in St. Lucie County. We appreciate your input and would like to take this opportunity to specifically address your comments and concerns regarding the project. As you are aware, FPL is working closely with the State of Florida in an effort to add new renewable energy and nuclear facilities to our system. We are undertaking these efforts in direct response to the needs of our customers and the Governors' Executive Orders to reduce greenhouse gas emissions.

In July 2007, Governor Charlie Crist signed Executive Order 07-127 establishing the goal of reducing Florida greenhouse gases emission levels by 2017 to 2000 levels, and ultimately, by 2050, to reduce greenhouse gases levels by 80 percent of the 1990 levels. FPL has taken a leadership role in the reduction of greenhouse gases. As a leader, FPL proposes to construct the first commercial wind energy project in the State of Florida.

We would like to point out that FPL Energy ("FPLE"), an FPL Group subsidiary, is the largest owner and operator of wind generating facilities in the United States. FPL Energy has successfully developed, constructed and operated wind energy facilities since 1997 and FPLE works very hard to preserve the surrounding environment when siting wind turbines. We at FPL believe that we can benefit from the expertise that our sister company has to offer with regard to properly siting a wind facility in Florida.

As a company, FPL has always been responsible and sensitive to the environment when siting a new facility. Before we embarked on the St. Lucie Wind Project we conducted an extensive Critical Environmental Issues Analysis (CEIA) to ensure the sites selected would be suitable. We took into consideration vegetation, wetlands, endangered species, archaeological, cultural and tribal resources. We also had to consider the available wind resources which are primarily found on the coast in Florida in suitable quantities to support wind generation.

In your letter you discussed three issues and made several recommendations, which we address below.

Audubon's Issue #1: Rigorous Pre-siting Wildlife Surveys

The results of the CEIA provided recommendations on each of the issues (vegetation, wetlands, endangered species, archaeological, cultural and tribal resources) identified. At this time FPL is following the recommendations that resulted from the CEIA. This lead FPL to hire an ecological consultant conversant in wind energy and wildlife issues to conduct both the qualitative risk assessment and supporting avian and bat field studies. Many of the concerns expressed in your letter are addressed under the scope of these assessments and studies.

Audubon's recommendation A: Minimum Survey Duration of two years

The existing monitoring program that FPL is conducting is appropriate in duration and scope for this size project, a 9 turbine project. For the Hutchinson Island Site there is more than sufficient information to characterize the relative seasonal abundance of the bird species that occur in the area.

Reference was made to US Fish and Wildlife Service's (FWS) Interim Guidelines. These guidelines were more directed at siting of wind farms rather than monitoring study design. A federal task force is just initiating a complete review and revision of these guidelines.

The final California Guidelines¹ were released in October. These guidelines suggest that more than one year of monitoring "may" be appropriate when there is not sufficient information to characterize the relative abundances of species occurring at the projects site.

The risk assessment utilized existing information from known structure-related mortality at the St. Lucie Nuclear facility as well as the nearby cell tower at Johnathan Dickinson State Park, interviews with local avian experts at the Florida Fish and Wildlife Conservation Commission (FWC), FWS, Treasure Coast Regional Planning Council (TCRPC), and Martin County Audubon, as well as the data from the literature, Breeding Bird Count (BBS), and Christmas Bird Count (CBC). These data sets provided information specific to the site and characterized patterns and relative abundance levels including seasonal abundance, migrants and resident species and evaluates the exposure potential for these species at the site across multiple years. This risk assessment is being supported by the avian and bat field studies.

The risk assessment also considered factors that are known to influence avian collisions at wind energy facilities. These include biological and environmental conditions and engineering factors in a typical turbine design. Exploration of site

¹ California Energy Commission and California Department of Fish and Game 2007. California Guidelines for Reducing the Impacts to Birds and Bats from Wind Energy Development. Commission Final Report, California Renewables Committee, and Energy Facilities Siting Division, and California Department of Fish and Game, Resource Management and Policy Division. CEC-700-2007-008-CMF

conditions relative to these indicates that the most critical determinants of avian mortality (low visibility due to atmospheric or topographic conditions and behavior-induced risks) are infrequent at this site and thus expected avian mortality will not be "biologically significant." Biological significant mortality is that which affects the population viability of a species.

To supplement this qualitative risk assessment, FPL initiated avian field surveys in November 2007 and is proposed to continue for a year, thus including migration periods. FPL has also contacted two operational wind facilities located on the north east coast of the United States, in New Jersey and Massachusetts, both have a similar number of modern turbines. A recent publication of the Massachusetts coastal site² indicates that greater than expected mortality did not occur for this coastal site and that estimated annual turbine mortality is similar to other wind projects. The first quarterly post construction report for the New Jersey site will be made available any day now but phone conversations suggest a low mortality rate here as well.

FPL will utilize information obtained from these operational wind farms when developing and monitoring the Hutchinson Island site. We will share this data with you and the regulatory agencies once it is available.

As stated earlier, FPL believes the pre-construction avian risk assessment and proposed pre-construction monitoring is sufficient to determine the potential risk to avian species in the WRA for the proposed nine turbines. FPL has committed to post construction monitoring in the area around the turbines. Based on FPL Energy's experience in successfully siting wind farms in a variety of environmental areas, one year of monitoring has been sufficient to verify pre-construction risk assessments.

Further, FPL has been working closely with FWS, the agency with jurisdiction over this matter. Clearly, throughout our meetings and dialogue with FWS, we have made them aware of the studies that we have performed and will continue to perform. We have received comments from FWS on our studies and our project and FWS have concurred with the proposed monitoring.

FPL recognizes that this is the first significant wind project in Florida and, as required by law, we will continue to work with the FWS and FWC. We would also like to have an open dialogue with Audubon with regard to the avian monitoring for the proposed wind turbine sites. FPL will share/discuss the results of the avian risk assessment and the ongoing monitoring reports with FWS, FWC and Audubon once they are complete.

The size of the proposed project, the availability of existing information regarding the bird resources of the area negate the need for multiyear monitoring to assess the impacts from this project. Imposing a two year pre-construction monitoring period is not needed and will result in delaying the installation of this very important renewable project. The delay will also impact our ability to assess the viability of

² Vliestra, L.S. 2007. Potential Impact of the Massachusetts Maritime Academy Wind Turbine on Common (*Sterna hirundo*) and Roseate Terns (*S. douglalli*). Vol-Issue 18-21:1-6

including wind energy generation as a part of the solution to meeting Florida's energy need.

Audubon's Recommendation B: Technical Review Committee

FPL will make the pre-construction reports available for the agencies and experts to review.

Audubon's Recommendation C: Qualitative Review

The qualitative review utilizes existing data (local Audubon, CBC, BBS, other bird experts, literature, and regulatory agency personnel) to further define risks to wildlife associated with the proposed wind energy facility.

Audubon's Recommendation D&E: Quantitative Review

Variable survey frequency is a component of the avian monitoring protocol. In addition to the scheduled periodic surveys there are also surveys times that will be triggered by atmospheric conditions associated with bird migration.

FPL has added NEXRAD analysis per FWS and Audubon's request. The NEXRAD analysis uses data from the US National Weather Service network of next generation weather radar for detection and tracking of bird movements. This data is being analyzed across several years providing timing of migratory movements and an index of activity level.

The data from the point count monitoring will be used to quantify the qualitative risk assessment at the proposed wind turbine locations. FPL feels the use of marine radar is not appropriate for turbines located on land and is excessive for this small scale facility.

Audubon's Issue #2: Use of Public Conservation Lands for Siting of Privately Owned Utilities

FPL has relocated the turbines that were proposed for the county parks. There will be six turbines on FPL property and three at Blind Creek. Based on this design, FPL will utilize, including access roads, approximately three (3) acres of land or less than 1% of the available area at Blind Creek. Blind Creek is owned by the State and South Florida Water Management District (SFWMD). FPL's detailed analysis of property on Hutchinson Island did not identify private property in FPL's service territory that was acceptable for wind turbines at this time. FPL has been in discussions with the State and the SFWMD to ensure both parties agree that placing the turbines on these lands is compatible with their intended use. Governor Crist has stated repeatedly that wind power must be part of the solution to the problem in Florida. The Governor and Cabinet, as the Board of Trustees of the Internal Improvement Trust Fund, will have final approval over the placement of wind turbines on state lands.

Audubon's Issue #3: Coastal Construction and Vulnerability

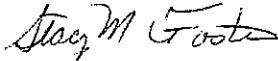
FPL is attempting to find suitable sites west of the Coastal Construction Control

Line (CCCL). However, due to site limitations and a desire to avoid wetland impacts, in some of the locations it may be necessary to locate these turbines east of the CCCL. In those cases, FPL will work diligently to minimize impacts to the coastal dunes and surrounding areas. Appropriate foundation designs and construction techniques will be employed as needed.

Finally, we firmly believe that all of the environmental benefits, to both humans and wildlife, should be taken into account by Audubon. If constructed, the St. Lucie Wind Project will, over the life of the project, offset nearly one million tons of carbon dioxide, thousands of tons of nitrogen oxide and sulphur dioxide, will emit no mercury or other harmful particulates, consume no water and offset the need to procure, ship and burn nearly two million barrels of oil.

In conclusion, we hope that FPL and Audubon will be able to work together to make the St. Lucie Wind Project a successful renewable option in Florida.

Sincerely,



Stacy Foster
Florida Power & Light Company
Principal Environmental Specialist

Cc: Eric Draper
Julie Wraithmell