

EXHIBIT I

List of Bacchus Exhibits and References for Supplemental DEIS Comments

(Exhibits can be downloaded from <http://www.nirs.org/nukerelapse/levy/levyhome.htm>)

A. Critical Deficiencies in the DEIS for the Proposed LNP

1. Bacchus' preliminary comments dated 10/26/10 on the DEIS for the proposed LNP
2. Bacchus' affidavit dated 11/12/10 regarding the proposed LNP and proposed Tarmac mine
3. Intervenor's Motion for Order Compelling Discovery of PEF Groundwater Model Digital Files for Proposed LNP dated 9/27/10
4. Atomic Safety and Licensing Board's (ASLB) Notice of Oral Argument and Testimony dated 10/15/10 on Motion to Compel PEF to produce all water-related model files for modeled results for proposed LNP relied on by NRC
5. Transcript of ASLB's Oral Argument and Testimony held 11/17/10 on Motion to Compel PEF to produce all water-related model files for modeled results for proposed LNP relied on by NRC
6. Intervenor's Amended Contention 4 dated 11/15/10 challenging licensing of proposed LNP
7. Economic impacts of mining on Levy County
8. Failure to preserve cultural resource sites
9. Ramifications of inadequate archeological assessments 11/25/10

B. Federal Agency Comments on DEIS for the Proposed LNP

1. U.S. Environmental Protection Agency comment letter 10/26/10
2. National Oceanic and Atmospheric Administration comment letter 10/26/10

C. Affected Area of Proposed LNP

See related exhibits from Bacchus' affidavit dated 11/12/10 on the proposed LNP and proposed Tarmac mine

1. Declaration of Emily Casey describing the vicinity of the proposed LNP site during the dry season including:
 - a. two videos of unnamed stream flowing into aquifer through karst conduit
 - b. three ground photographs of proposed LNP site and vicinity
 - c. two aerial photographs of proposed LNP site and vicinity
 - d. LNP DEIS Fig. 3-4
2. Mapped karst conduit flowpaths Fig. 3, Bacchus and Barile, 2005
3. Conceptual drawing of proposed LNP DEIS Fig. 3-2
4. Floodplains map LNP ER Fig. 4.1-1 100-Year Flood Zone Map
5. USGS Topographic map 5 mile PEF Environmental Report Fig 2.7-23 12/9/09
6. Wetland classification map LNP DEIS Fig. 2-4 8/10
7. Waters of the U.S. and catastrophic destructive wildfires, Bacchus 2007
8. Levy County sinkholes and faults PEF Environmental Report Fig 2.6-2 12/9/09
9. Groundwater drawdown contours LNP DEIS Fig 5-1
10. Model Grid LNP DEIS Fig 2-12
11. Potentiometric high in LNP affected area King Road Mine Fig 1 1/22/08
12. LNP FSAR Ch. 2 Geological Conditions excerpts

D. Adverse Environmental Impacts from Altered Water Quantity and Quality from the Proposed LNP

See related exhibits from Bacchus' affidavit dated 11/12/10 on the proposed LNP and proposed Tarmac mine

1. Multi-basin and sub-basin affected areas
 - a. Multi-basin impacts – Rainbow Springs/River LNP DEIS Fig 2-7
 - b. Sub-basin impacts – coastal discharges LNP DEIS Fig 2-8
 - c. Sub-basin impacts – Outstanding Florida Waters PEF LNP Exhibit Griffin-1
 - d. Sub-basin impacts – springs and estuarine ecosystems LNP DEIS Fig 2-17
 - e. Suwannee River Water Management District Water Supply Assessment Report 2010
 - f. FDEP Withlacoochee impaired verified-c2 11/2/10
 - g. FDEP Waccasassa impaired waters 11/5/10

2. Giant holes in the flood plain
3. Critical wildlife habitat in Levy County 2009
4. Improved Assessment of Baseline Conditions and Change in Wetlands Associated with Groundwater Withdrawal and Diversion, Bacchus 1995
5. Passive dewatering, Bacchus 2006

E. Adverse Environmental Impacts from Aerial Deposition of Salt and Other Contaminants from the Proposed LNP

1. LNP salt drift FLDEPCOC appendices 21
2. LNP Bruner email Tampa climate data 1/19/10
3. Cover Classification Map for South Levy/North Citrus Counties (based on SWFWMD 2006 Lev3, FLLUCSDESC)
4. NOAA Tampa data used in PEF's climatological model showing no rainfall for entire month
5. NOAA Tampa data used in PEF's climatological model showing 10/10 driest month on record - Chiefland
6. NUREG 1555 on salt drift and other contaminants
7. Crystal River Nuclear Power Plant Aerial Photographic Monitoring Salt Drift Report 1995

F. Unpermitted "Taking" of Endangered and Threatened Species

1. WAR photos of CFBC springs and 9/23/10 DEIS comments
2. Bacchus coastal impacts to listed species paper 2006
3. Save the Manatee case regarding manatee population using the CFBC

G. Avoidance - Alternatives Not Considered or Inadequately Assessed v. Mitigation

1. Proposed LNP regional transmission corridors substations DEIS Fig 2-5
2. Rooftop Solar PV - Florida Solar Energy Center
3. Rooftop Solar PV - California Solar Energy Center
4. Decoupling "conservation" alternative

H. No Bona fide Comprehensive Cumulative Effects Analysis Conducted

1. 1997 Cumulative Effects Report Synopsis: Council on Environmental Quality. 1997. Considering Cumulative Effects Under the National Environmental Policy Act. Executive Office of the President; What are Cumulative Impacts? Synopsis of the U. S. Council on Environmental Quality

I. List of Bacchus Exhibits and References

References

Bacchus, S. T. 1995*. Improved assessment of baseline conditions and change in wetlands associated with groundwater withdrawal and diversion. pp. 158-167 *in*: K. J. Hatcher (ed.) Proceedings of the 1995 Georgia Water Resources Conference, held April 11 and 12, 1995, at The University of Georgia, Athens, GA.

Bacchus, S. T. 2001. Knowledge of groundwater responses - A critical factor in saving Florida's threatened and endangered species. Part I: Marine ecological disturbances. *Endangered Species Update* 18(3):79-90

Bacchus, S. T. 2006. Nonmechanical dewatering of the regional Floridan aquifer system. pp. 219-234 *in*: R.S. Harmon and C. Wicks (eds.) Perspectives on karst geomorphology, hydrology, and geochemistry – A tribute volume to Derek C. Ford and William B. White. Geological Society of America Special Paper 404

Bacchus, S. T. 2007. More inconvenient truths: Wildfires and wetlands, SWANCC and Rapanos. *National Wetlands Newsletter* 29(11):15-21.

Bacchus, S. T. and P. J. Barile. 2005. Discriminating sources and flowpaths of anthropogenic nitrogen discharges to Florida springs, streams and lakes. *Environmental & Engineering Geoscience* 11(4):293-316.

Endries, M., T. Gilbert and R. Kautz. 2009. *The Integrated Wildlife Habitat Ranking System 2009*. Florida Fish and Wildlife Conservation Commission, Tallahassee, FL 23 pp.

* awarded "Best Paper of the Year" for applied sciences from University of Georgia Institute of Ecology