

WWALS Watershed Coalition, Inc.

the WATERKEEPER® Alliance Affiliate for the upper Suwannee, Withlacoochee, and Alapaha Rivers a 501(c)(3) nonprofit charity PO Box 88, Hahira, GA 31632 wwalswatershed@gmail.com www.wwals.net



March 7, 2016

Re: The rest of the story about the proposed Sabal Trail pipeline

Dear Commissioners,

Spectra Energy, FPL, Duke Energy won't tell you many things about their joint pipeline project Sabal Trail Transmission, LLC (STT), such as landowners don't have to take their one-time easement payment offers (STT has routed around many), sinkholes and springs abound much closer to the pipeline path, Spectra's pipeline explosion under the Arkansas River in Little Rock last May, risks to our drinking water in the Floridan Aquifer, and there is no need for this pipeline now that solar power is cheaper, faster, and far cleaner and safer. Plus there are things you can do. Please don't just listen to Sabal Trail. Get the rest of the story, as Paul Harvey used to say.

Please find attached a letter that WWALS board member Chris Mericle recently sent to the Hamilton and Suwannee Boards of County Commissioners. It discusses serious discrepancies between what Spectra Energy and Sabal Trail have been telling local elected officials and staff and what publications by USGS, SRWMD, and independent Practicing Geologists say, as well as what you can see for yourself along the pipeline route.

Here, for example, is a picture of a sinkhole in Suwannee River State park in Hamilton County, with the man in the far background gesturing at a Sabal Trail survey stake less than 60 feet away, on February 18th when Chris Mericle took Suwannee and Hamilton County Commissioners on this hike. We can arrange a similar hike for you, either there, or to one of several other sites in several counties where there are obvious sinkholes near or on the proposed pipeline path.

Sabal Trail may have told you everything is permitted, yet there are several permits still not issued by Georgia



and Florida, and the Army Corps of Engineers is still actively considering new information, especially from elected officials, to this address:

Re: Applicant Sabal Trail Transmission, LLC; application number SAJ-2013-03030 Applicant Florida Southeast Connection, LLC; application number SAJ-2013-03099

To: U.S. Army Corps of Engineers
Jacksonville District Regulatory Division
Jacksonville Permits Section
Attn: Mr. Mark R. Evans
Post Office Box 4970
Jacksonville, Florida 32232

(904) 232-2028, Mark.R.Evans@saj02.usace.army.mil

You can also ask the Corps to come with you when you walk the Sabal Trail and see sinkholes they didn't tell the Corps about. Even better: ask Sabal Trail to come along, too, and explain themselves on the spot.

The Federal Energy Regulatory Commission (FERC) says there is a need for this pipeline because Sabal Trail has customers, namely FPL and Duke Energy, which want to build natural gas power plants to "modernize" coal plants. Yet solar power is now less expensive than any other power source, does not require years of permitting process, does not emit any pollutants, and, perhaps most importantly, does not require eminent domain. Why should your citizens have to give up land for profits for FPL, Duke, and Spectra Energy of Houston, Texas?

Please see appended the multiple studies that show how to power each and every U.S. state on sun, wind, and water power and nothing else by 2050, with most of that by 2035. They're cited in the two letters from WWALS to the Suwannee County Commission appended to this packet.

You can write directly to FERC's Commissioners:

To: Norman C. Bay, Chairman

Tony Clark, Commissioner

Cheryl A. LaFleur, Commissioner

Phillip D. Moeller, Commissioner

Colette D. Honorable, Commissioner

Federal Energy Regulatory Commission

888 First Street, N.E.

Washington, D.C. 20426

Cc: Ms. Kimberly D. Bose, Secretary

Re: Sabal Trail Transmission, LLC, FERC Docket No. CP15-17-000 Florida Southeast Connection, LLC, FERC Docket No. CP14-554-000

Neither Sabal Trail nor FERC will tell you there are four already-authorized Liquid Natural Gas (LNG) export

operations where the end of this pipeline chain goes through FPL's Florida Southeast Connection to Martin County. They won't tell you about Kinder Morgan's application to FERC (Docket No. CP15-144) for another natural gas pipeline from Suwannee County to Jacksonville, where Jaxport has been loudly gearing up for LNG export for a couple of years now. They won't tell you that Florida East Coast Railroad already has authorization to pick up LNG from Martin County (Office of Fossil Fuels, U.S. Department of Energy, Order No. 14-209-LNG, March 18, 2015) and ship it by rail up and down the Florida coast as far as Miami and Jacksonville. Sabal Trail is not just one pipeline: it's a Florida-wide boondoggle.

Sabal Trail may tell you it's a done deal, but it's not. You can also pass a resolution against Sabal Trail. Two counties in Florida (Hamilton and Suwannee) plus the city of Groveland in Lake County have done so, as have five counties and three cities in Georgia (Valdosta, Moultrie, and Albany).

You can even pass a land use ordinance about pipelines, rooted in your comprehensive plan, in the same way that Jefferson County passed an ordinance to prohibit Nestle or any other company from taking local water for bottling from their county.

You can also contact your members of Congress and ask them to do what four Georgia Congressmen have already done: ask the Federal Energy Regulatory Commission (FERC) to fix its broken process or revoke Sabal Trail's certificate. You can ask FERC directly to revoke Sabal Trail's certificate.

If Sabal Trail or FPL asks to talk to you, the Commissioners, especially if they ask to do it one-by-one, here are twenty questions WWALS supplied to Suwannee County Commissioners you might want to adapt:

- 1. Would these reps be willing to "hike the hike" and see for themselves that active sinkholes are directly on the pipeline crossing path?
- 2. Please explain the many sinkholes and springs on or much closer to the path of the pipeline than indicated in Sabal Trail Transmission (STT)'s filings with FERC, for example those that Tom Edwards testified to and Sabal Trail's own Gregg Jones corroborated in sworn testimony in WWALS v. Sabal Trail & FDEP. http://www.wwals.net/issues/stt/
- 3. Please provide copies of LiDAR and Ground-Penetrating Radar for the crossings of the Suwannee and Santa Fe Rivers and the Falmouth Cathedral Cave System.
- 4. Please explain what STT will do if drilling or subsidence causes a leak of groundwater or other substances into the aquifer, especially into the Falmouth Cave System.
- 5. What happens if there is subsidence under the pipeline under the Suwannee River after construction?
- 6. What are STT's detailed plans for emergency response in the event of a pipeline/compressor station fire/explosion?
- 7. What security measures are taken to lessen the chance of terrorist attacks or sabotage to the pipeline or compressor station?
- 8. How much and which parts of Suwannee and Hamilton Counties are considered low population (or "the middle of nowhere", as Spectra executive Alan Lambert put it) that only the thinnest grade pipeline will be used?
- 9. How does STT or Spectra vet and train its employees? Licensed, bonded, insured?
- 10. How many Suwannee County residents will be employed by STT or Spectra?
- 11. What pipeline and compressor station installation companies or personnel has Spectra or STT hired, and what are their track records (company safety record or employee bios)?
- 12. Can STT provide details of the compressor station's structure, such as footprint, number of stories? What measures are taken to buffer for visual unsightliness, noise, explosion bunkering?
- 13. Given that even Judge Canter just ruled against FPL for causing groundwater salinity through an inadequate plan for its Turkey Point power station, what concrete measures will STT or Spectra take to ensure drilling or testing water withdrawals or outputs will not cause adverse salinity or other effects on the rivers or aquifer?

 http://www.mypalmbeachpost.com/news/business/judge-fpls-turkey-point-plants-canals-polluting-bi/nqS6T/
- 14. What happens to this pipeline when natural gas is no longer economically feasible. Say, 30 years or so in the future?
- 15. Who assumes economic responsibility if the flow or water quality of the Suwannee River is profoundly affected? (Note that EPA scientists have stated that it is a risk.)
- 16. Please explain how merely the ability to complete this pipeline makes it a public good, given that Spectra Energy of Houston, Texas would profit at the expense of numerous local landowners and taxpayers?
- 17. What financial interest or contractual or other agreements does STT or Spectra or FPL have with Kinder Morgan regarding KMI's Jacksonville Expansion Project, whose FERC filing (Docket No. CP15-144) explicitly says Sabal Trail can connect if it wants to? http://spectrabusters.org/lng-export/#Florida
- 18. What financial interest or contractual or other agreements does STT or Spectra or FPL have with the four or more already-authorized LNG export operations at the end of Florida Southeast Connection or the one pending at the end of the Citrus County lateral?
- 19. Since Florida already gets 60% of its electrical grid energy from natural gas, why is making the state even more dependent on the same energy source a good idea? http://spectrabusters.org/allies/#Sierra-Club-
- 20. Now that Georgia is the fastest-growing U.S. solar power market, and there are more jobs in the solar industry than in oil and gas extraction (see appended letters from WWALS to Suwannee County Commission), why is building any new pipeline a good idea?

You can also write to the EPA, which can still influence what other agencies do, up to and including asking for a revised Environmental Impact Statement from FERC:

To: Attn: Christopher Militscher
Environmental Protection Agency Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960
militscher.chris@epa.gov

Re: EPA CEQ No. 20150256

These pipelines are all driven by a glut of natural gas from hydraulic fracturing (fracking), according to testimony by one of FERC's own Commissioners, by the head of the Office of Fossil Fuels, and according to numerous industry publications. They have nothing to do with any alleged need by Florida.

The Florida legislature just abandoned a bill that would have promoted fracking in Florida, after massive opposition from counties across the state. Now is a good time to lobby them to do what both South Carolina and Georgia are doing: passing bills to limit eminent domain for pipeline companies.

If these things didn't matter, the pipeline companies wouldn't be lobbying heavily against them.

You are not alone. Many citizens and organizations throughout Florida, Georgia, and beyond are fighting this waste of taxes and ratepayer funds that would go to pipeline companies from Houston, Texas at local expense of eminent domain, property values, environmental destruction, and risks to the tourism industry, local taxes, property, and the water that gives us all life.

For the rivers and the aquifer.

Sincerely,

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John S. Quarterman, President

Attachments:

- Letter from WWALS Board member Chris Mericle, February 23, 2016
- Geology Report by Dennis Price, P.G., October 25, 2015, available online as: http://www.wwals.net/?p=18117
- Aerial Map, Hamilton County, by Sabal Trail, February 27, 2015
- Aerial Map, Suwannee River crossing, by Sabal Trail, February 27, 2015
- Karst Features Table, detail selected by Chris Mericle, by Sabal Trail, September 30, 2015
- North Springshed Analysis, by Cardno for Sabal Trail
- \$38.3 Billion in Consumer Spending on Outdoor Recreation --Florida State Parks
- WWALS to Suwannee BOCC about Sabal Trail, February 2, 2016 http://www.wwals.net/?p=16232
- WWALS to Suwannee BOCC about Sabal Trail, January 19, 2016 http://www.wwals.net/?p=15640

WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, and Upper Suwannee River watersheds in south Georgia and north Florida through awareness, environmental monitoring, and citizen activities











Commissioners.

Suwannee River Crossing Site:

The current proposed route, according to Sabal Trail aerial view Drawing number 1657-PL-FL-DG-72026, crosses the Suwannee River State Park property between MP 266.8 and MP 267.3. Table 6.5-1 identifies 17 "closed topo depressions" between MP 266.8 and MP 267.3, a distance of .5 miles(2,640') and a width of .5 miles(1/4 mile each side of the proposed route). The closest feature to the proposed pipeline route listed in table 6.5-1 is a closed topo depression 750' away from the route centerline.

In the geology report of the Suwannee River crossing site by Professional Geologist Dennis Price figure 2 shows a LiDAR image of approximately 1,000 feet of the proposed pipeline route through the Suwannee River State Park property.

The green dots are GPS located sinkholes, the blue are other non-GPS located sinkholes. Mr. Price describes the LiDAR image as such: "...the entire floodplain area exhibited active sinkhole features too numerous to locate but very evident on the LiDAR map (every blue feature)."

Upon taking a look at figure two I was able to count at least 30 sinkhole features. Mr. Price's LiDAR image is only a fraction of the proposed route that crosses the Suwannee River State Park property. The two active sinkholes pictured in Mr. Price's report are approximately 50'-60' away from the proposed pipeline route centerline, much closer than The 750' that Sabal says is the closest karst feature to the route.

Why the huge discrepancy between table 6.5-1 and findings in Mr. Price's report? If the information provided to FERC from Sabal Trail on this small but very critical and sensitive site is wrong, why should we believe that the information Sabal Trail provided anywhere is correct?

Sabal Trail's response to questions about use of LiDAR as an evaluation tool:

"In addition to these detailed complex site-specific investigations, LiDAR data was used to evaluate the entire route through karst areas. The LiDAR is a screening tool that was augmented with geophysical and geotechnical evaluations, as well as field surveys, which provide more detailed site specific data."

Sabal Trail has repeatedly stated that LiDAR was used to evaluate the proposed route. I have repeatedly asked for the LiDAR images and data to be produced to no avail. If LiDAR was in fact used to evaluate the Suwannee River crossing Site by Sabal Trail, would not the same data be found by Sabal Trail as was found By Mr. Price? Also, field surveys (which are more detailed according to Sabal Trail) should have revealed the sinkholes in figure two of Mr. Price's report. Only a small number of depressions were reported by Sabal Trail.

Sabal Trail would have us believe that the Floridan Aquifer does not extend below the river or allow for flow of water at depths lower than the river:

"The rivers are the base of the groundwater flow system and are the discharge areas.

- There is little or no flow beneath the river
- Potential impacts would be confined to the vicinity of the HDD crossing"

Proof that water does indeed flow under the river exists with mapped cave systems in the Suwannee-Withlacoochee confluence region that actually go under both the rivers. Other evidence exists that shows deep ground water flow and that impacts could be felt Miles away in deep wells in the region. The water in these wells, some miles from the river, turns brown in color as the river water rises. The tannic water from the river only takes days to work its way through deep underground porous rock and caverns.

Falmouth Cathedral Cave System:

In the recent hearing, WWALS Watershed Coalition vs DEP and Sabal Trail, lead geologist for Sabal Trail Greg Jones testified that the Falmouth cave lies over 100' underground.

Professional Geologist Dennis Price's report shows that the cave system is closer to 30' below ground.

Quite a large discrepancy!

If you take a trip to Falmouth Spring you will see first hand that Mr. Price's figures are accurate.

The proposed pipeline route will have to go under Hwy 90 and CSX railroad and over the Falmouth cave all at the same spot. The depth of the pipeline at this location is unclear but, will probably be around 15' +- leaving only about that distance above the cave.

As Dennis states in his report Sabal does not have a mitigation plan to deal with a collapse of the cave roof.

I have been referring to Falmouth as a cave (which it is) but it is also a spring conduit. Falmouth Cathedral Cave ends at Lime Run Spring. Both Falmouth Spring and Lime Run Spring are Magnitude one springs. Both these springs are ignored by Sabal Trail. On the Springshed map Sabal does not show a Springshed for these springs. The map also does not include them in the distance to the pipeline table. The table shows Madison Blue Spring as the closest Mag. 1 spring to the pipeline at 1.7 miles from the centerline of the route. Both Falmouth and Lime Run are closer to the route than Madison Blue.

Sabal Trail and FERC say that River crossings and sensitive areas such as the Falmouth Cathedral cave are of utmost importance and deserve the highest level of scrutiny. I personally do not believe the proper due diligence has been done at either of these sites. Sabal Trail should be required to start over with their environmental survey because, as I said earlier:

If we can not trust Sabal Trail to do their job here at these sensitive and critical sites why should we trust that Sabal Trail did the proper due diligence anywhere else.

Chris Mericle WWALS Watershed Coalition Board Member Waterkeeper Affiliate for the Upper Suwannee River







TABLE 6.5-1

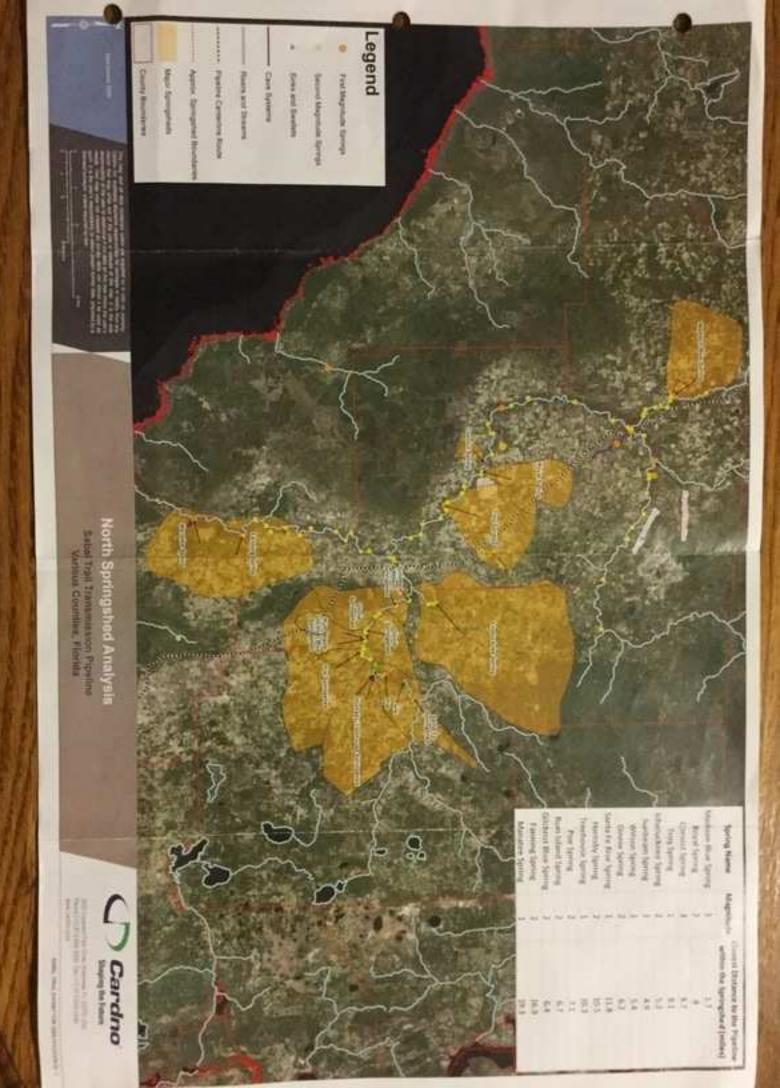
Karst Features within 0.25 mile of the Sabal Trail Pipeline Route

State	MP	Direction* (feet)	Karst Feature	Regional Karst Terrain
Ę	266.3	-654	Cluster of very small sinkholes	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly
Ę	266.3	-222	Small Sinkhole	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
F	266.7	1097	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
P	266.9	-995	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
FL	266.9	1157	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
2	267.0	-1311	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
FL	267.0	-1250	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
FL	267.0	-1165	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
Ę	267.0	-1018	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
FL	267.0	-908	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate, Bare or thinly covered.
FL	267.1	-1196	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
E	267.1	-1146	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
7	267.1	-1038	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
FL	267.1	-1011	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
FL	267.1	-750	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
1	267.2	-1312	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
F	267.2	-1053	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.



TABLE 6.5-1

State	MP	Distance/ Direction* (feet)	Karst Feature	Regional Karst Terrain
E	267.2	- 968	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
FL	267.2	-953	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
7	267.4	-752	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
Ę	267.4	909	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
핃	267.6	631	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
된	267.6	650	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
F	267.6	1153	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
긛	267.8	246	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
Ę	267.9	80	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
핃	268.0	414	Modified Potential Sinkhole	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
Ę	268.1	90	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
핃	268.1	1264	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
핃	268.4	-263	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
F	268.7	-42	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
P	268.7	136	Potential Sinkhole	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
된	269.0	-1037	Closed Topo Depression	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly covered.
	2690	-980	Closed Topo Dopropio	Sinkholes are few, generally shallow and broad and develop gradually. Solution sinkholes dominate. Bare or thinly





OUTDOOR RECREATION & TRAILS!

CONNECTING THE DOTS BETWEEN TRAILS & TOURISM





Recreation has long served as an economic driver in Florida, as the state remains a major destination for national and

PICTURE Map of 171 Florida's state parks & trails \$38.3 Billion In

- **Consumer Spending**
- > Nearly 330,000 Jobs
- > \$2.5 Billion In State & Local Taxes

> \$10.7 Billion In Wages international tourism. Outdoor Industries Association, 2012. The Florida Outdoor Recreation Economy Report



FLORIDA STATE PARK VISITATION GENERATES **NEARLY \$2.1 BILLION ON LOCAL ECONOMIES**

With more than 1,600 miles of multi-use trails, Florida State Parks receive over 27 million visitors annually, creating 29,396 jobs.

Honeymoon Island State Park

had the greatest local economic impact totaling \$85.9 million.



~\$86,000 DIRECT LOCAL IMPACT

"The West Orange, Little Econ, and Cady Way trails in Orange County supported 516 jobs and an estimated economic impact of \$42.6 million in 2010."

East Central Florida Regional Planning Council (2011)



> Every \$1 spent on biking trails and walking paths could save approximately \$3 in medical **expenses** (American Heart Association)

²ibid

> Every \$1 million spent on trails yields 9.6 jobs

(University of Massachusetts, 2011)



Trails add value to new homes and consistently remain the number one community amenity sought by prospective homeowners

(National Association of Homebuilders, 2008).

A 2011 study by the University of Cincinnati found that homes within 1000 ft. access to the Little Miami Scenic Trail increased in value by \$9K. The scenic, multipurpose trail beckons walkers, hikers, skaters and bicycle enthusiasts and also has horseback riding paths.

WHAT ARE FLORIDA VISITORS & RESIDENTS DOING OUTDOORS?



The second most popular outdoor activity for both residents and visitors (SCORP 2011) and brings in almost \$5 billion annually to the state's economy.

Florida's rich diversity of wildlife attracts millions of visitors to public lands such as Florida's 171 State Parks, of which 96 are included as sites on the **Great Florida Birding** and **Wildlife Viewing Trail.**



According to the Florida
Department of Agriculture
and Consumer Services,
the equestrian industry's
economic impact on the
gross state product is \$6.5

billion. Florida's State Parks offer 1,889 miles of equestrian trails.



During a year of average river flows, annual park attendance at **Suwannee River State Park** is usually more than 700,000 with **direct economic impact**

more than \$30 million, according to the Florida Park Service.



According to the 2013 SCORP, nearly 25 million residents and tourists participate in bicycling in Florida annually.

More than 18.4 million on

paved trails and nearly 6.5 million on unpaved trails.

Biking paths are the second most desired facility for Florida residents.

The 2011 Outdoor Recreation Participation study highlights the tight link between recreation and tourism in Florida, determining:



of Florida's tourists believe that outdoor recreation is important to them.



of tourists are satisfied with outdoor recreation opportunities in the state.



of all Florida visitors participate in naturebased activities during their visit (Visit Florida, 2012).

Trails boost fitness and well-being, a connection with the outdoors and economic growth.

Visit www.dep.state.fl.us/gwt/ to find trail near you.



WWALS Watershed Coalition, Inc.

a WATERKEEPER® Alliance Affiliate a 501(c)(3) nonprofit charity

PO Box 88, Hahira, GA 31632 wwalswatershed@gmail.com www.wwals.net

January 19, 2016



To: Suwannee County Board of County Commissioners,

Dear Commissioners,

Thanks again for your hospitality at your meeting of December 15th.

Solar and wind can make coal go away with no need for natural gas.

The FPL representative who spoke didn't seem aware of what Southern Company CEO Tom Fanning said about solar power last June: "If somebody wants to buy distributed generation, I want to sell it to 'em." See Herman K. Trabish, UtilityDive, June 11, 2015, "Inside Georgia Power's move into the residential solar market: The utility says it will offer solar through an unregulated business, but installers fear possible anticompetitive impacts":

http://www.utilitydive.com/news/inside-georgia-powers-move-into-the-residential-solar-market/400562/

That meeting gave me deja vu about a few years ago when Georgia Power and Southern Company were claiming Georgia was too cloudy just like that FPL rep said last month about Florida. Yet Georgia turned into the fastest-growing U.S. solar market, as I mentioned in my letter to you of December 15th. Did Georgia suddenly become less cloudy? No more than Florida needs to.

Also FPL has been pushing for a pipeline like Sabal Trail since its previous attempt was rejected in 2009 by the Florida Public Service Commission. So the other excuse I've heard from Sabal Trail and FPL that the federal Clean Power Plan requires shifting coal plants to natural gas is just that: an excuse. The Clean Power Plan didn't even exist back then, nor in 2013 when FPL let the contract to Spectra Energy for Sabal Trail. And while that Plan does make coal plants more expensive to run, it actually puts some barriers in the way of natural gas., while promoting truly renewable energy, namely solar and wind power. See Rachel Cleetus, Union of Concerned Scientists, August 7, 2015, "Four Ways the Final Clean Power Plan Limits the Rush to Natural Gas":

http://blog.ucsusa.org/rachel-cleetus/four-ways-the-final-clean-power-plan-limits-the-rush-to-natural-gas-839

It's not just Southern Company's Fanning who finally gets it that solar and wind are the future already here now. See Gavin Bade, Utility Dive, June 10, 2015, "EEI 2015: 5 major utility CEOs on the transformation of the energy system: Chiefs of Edison International, AEP, Exelon and Southern hold revealing panel discussion",

What [Edison International CEO Ted] Craver was more confident about, however, was [Tesla CEO Elon] Musk's prediction that in the long run, a third of generation will be distributed, which could also hurt load growth for utilities. To that, Southern's Fanning had a simple answer: "If distributed generation is eroding your growth, own distributed generation!"

And [Dominion CEO Tom] Farrell's doing more than talk on that front. Last month, Georgia Power, a Southern subsidiary, announced it would enter the rooftop solar market.

While FPL continues to plan more fracked methane power plants, and recently bought its parent NextEra Energy's fracking operation in Oklahoma, NextEra itself is rapidly getting deeper into solar power. NextEra subsidiary Nextera Energy Resources has solar operations in California, Nevada, New Mexico, and even New Jersey, but not in Florida. Is Florida cloudier with less sun than New Jersey?

http://www.nexteraenergyresources.com/what/solar.shtml http://webtest.nexteraenergyresources.com/pdf_redesign/Paradise.pdf

NextEra's Yieldco NextEra Energy Partners (NEP) is even selling off its part of two Texas natural gas power plants, shedding 2,988 MW of dirty gas burning. Sure, NEP is still conflicted, also owning the NET Mexico Pipeline, exporting fracked methane to Mexico. But at least NEP is looking to the sun.

 $\underline{http://www.marketwatch.com/story/nextera-energy-resources-agrees-to-sell-texas-fossil-generating-ass} \\ \underline{ets-to-an-affiliate-of-energy-future-holdings-2015-11-27} \\$

Neither Southern Company nor NextEra are pioneers in the solar market. Back in 2003 when Austin, Texas was growing 10% per year and actually had to find new power sources (unlike Florida, which could reduce its power consumption with conservation and efficiency), Austin Energy examined options of buying into a nuclear power plant (tried before: late, overbudget, huge political opposition), a coal plant (but Austin is clean industry city) and finally ran the numbers on solar power. Result: spending as much money as a coal plant would cost instead on rebates for solar panels on house and business roofs would get just as much power, installed faster, and distributed so it didn't all go out at once.

So that's what Austin Energy did, a dozen years ago when solar panel prices were 50% higher than now. They've been followed by Cobb EMC, Georgia Power, and it looks like now NextEra. http://www.l-a-k-e.org/blog/2012/04/austin-energy-changed-from-anti-solar-to-pro-solar-in-one-year.html

As mentioned in my previous letter, even FPL is finally starting to deploy solar farms in Florida.

Still many people rightly wonder, how can we go straight to clean energy, and how fast? Fortunately, somebody has already researched that, for each of the 50 U.S. states and for 135 countries, showing how to convert the electrical grid to sun, wind, and water power within about a decade with no need for any new technology, and everything else by 2050. Sure, there is new technology being developed, especially in power storage, and any new tech will accelerate the conversion of everything to clean sun, wind, and water power. The conversion is already happening right now with existing technology,

especially next door in Georgia. The only real impediments are politics and backwards laws, and Florida is poised to pass a solar financing law much like the one Georgia passed last year. http://thesolutionsproject.org/

Here's an overview by Bjorn Carey, Stanford News, June 8, 2015, "Stanford engineers develop state-by-state plan to convert U.S. to 100% clean, renewable energy by 2050: Mark Z. Jacobson and colleagues show that it's technically possible for each state to replace fossil fuel energy with entirely clean, renewable energy."

https://news.stanford.edu/pr/2015/pr-50states-renewable-energy-060815.html

Here's a 138-page peer-reviewed paper, "100% clean and renewable wind, water, and sunlight (WWS) all-sector energy roadmaps for the 50 United States," Energy Environ. Sci., 2015, 8, 2093: https://web.stanford.edu/group/efmh/jacobson/Articles/I/USStatesWWS.pdf

So why would FPL want to add still more natural gas when Florida already gets 60% of its power from that one source, thus putting the whole state at risk of the vulnerabilities of a few pipelines into the state when the sun shines on everyone and the wind blows offshore? It could be because the old ways bring easier profits through PSC-guaranteed annual profits for big baseload capacity power plants. Profits at the expense of Suwannee County landowners and taxpayers, not to mention FPL ratepayers.

But Southern Company's Tom Fanning answered that, too, in the same article about the 5 utility CEOs:

Distributed generation, Fanning said, is not disruptive. In fact, it's a "natural evolution of central station generation."

Asked by Greentech Media during the media availability how it responds to anticompetitive concerns from solar providers, Fanning said that his utility is simply responding to customer desires. Consumers want solar, and they want it from a trusted provider, so Georgia Power will enter the market. From his perspective, distributed generation is little different from central station generation, except for the benefit that it's closer to the customer, minimizing line losses.

Fanning wasn't saying any of that a year ago, I can say from attending Southern Company stockholder meetings for years. That's how fast a big utility can turn to the sun. Back to the article:

Utilities know more about the grid than anyone, [Exelon Corp. CEO and EEI Chairman Nick] Akins ["who runs the biggest coal generator in the country"] said in backing up Fanning, so they should be the distributed generation providers if consumers want it. What's more, he said, utilities can ensure that distributed generation can be deployed for all customers, while solar installers have tended to eschew low income communities with fewer means to pay for their product.

Southern Company has the biggest private utility R&D operation in the country. If it and Exelon and Dominion are moving ahead into solar power, with even FPL's parent NextEra Energy apparently joining them, FPL is a drag on the economy, water, air, and health of the state of Florida by pushing more fracked methane when solar power is already here right now ready for the Sunshine State.

FPL probably didn't tell you most of this, but you can see it's all well documented.

As an advocate of watershed conservation and stewardship, WWALS has long opposed new pipelines and promoted solar power, including sending two board members to testify at a Georgia Public Service Commission meeting in June 2013 shortly before the GA PSC required Georgia Power to buy twice as much solar power as it wanted, putting Georgia Power and Southern Company on the path to a clean solar future they finally chose last year, turning Georgia into the fastest-growing U.S. solar market. WWALS now advocates the same for Florida.

Which do you want for Suwannee County? Bringing up the caboose of the 20th century with still more natural gas pipelines taking easements from local citizens' property and risking their air and water while drilling under the Suwannee and Santa Fe Rivers and the Falmouth Cave System and risking our sole-source of drinking water, the Floridan Aquifer? Or getting on with the conversion already under way to solar power inland and wind offshore that doesn't require eminent domain, doesn't leak, burn, explode, or cause sinkholes, plus is faster to install and more dependable?

Thanks again for your hospitality, and I write in the spirit I'm sure we all share of conservation and stewardship of all our waters.

Sincerely,

[/S]

John S. Quarterman, President

229-242-0102

WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, and Upper Suwannee River watersheds in south Georgia and north Florida through awareness, environmental monitoring, and citizen activities











WWALS Watershed Coalition, Inc.

a WATERKEEPER® Alliance Affiliate a 501(c)(3) nonprofit charity

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February 1, 2016



To: Suwannee County Board of County Commissioners,

Dear Commissioners,

It's good to see you have a workshop about Sabal Trail's proposed river crossings on the agenda for tonight. WWALS, including its members in Suwannee County, continues to oppose any such crossings of the Suwannee River or the Santa Fe River, or anywhere in the fragile karst terrain of central Florida and south Georgia containing our drinking water in the Floridan Aquifer.

Here's more evidence that solar and wind can make coal go away with no need for natural gas. A new study shows adding interstate high-voltage DC electric power lines to load-balance across the U.S. would enable a very rapid shift to solar and wind power, dropping CO2 emissions by 80% from 1990 levels by 2030, five years from now. Florida needs to do its part by deploying solar power for local production during sunny days, rather than wasting \$3 billion on yet another natural gas pipeline.

"Better power lines would help U.S. supercharge renewable energy, study suggests," by Puneet KolliparaJan., in Science, 25 January 2016,

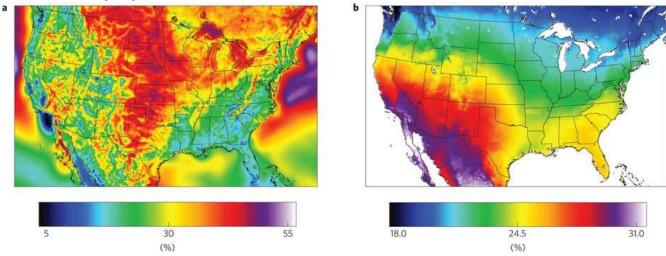
 $\frac{http://www.sciencemag.org/news/2016/01/better-power-lines-would-help-us-supercharge-renewable-energy-study-suggests}{}$

"Analysts have long argued that nations aiming to use wind and solar power to curb emissions from fossil fuel burning would first have to invest heavily in new technologies to store electricity produced by these intermittent sources—after all, the sun isn't always shining and the wind isn't always blowing. But a study out today suggests that the United States could, at least in theory, use new high-voltage power lines to move renewable power across the nation, and essentially eliminate the need to add new storage capacity.

"This improved national grid, based on existing technologies, could enable utilities to cut power-sector carbon dioxide emissions 80% from 1990 levels by 2030 without boosting power prices, researchers report today in Nature Climate Change."

"Future cost-competitive electricity systems and their impact on US CO2 emissions," by Alexander E. MacDonald, Christopher T. M. Clack, Anneliese Alexander, Adam Dunbar, James Wilczak & Yuanfu Xie, in Nature Climate Change, 25 January 2016, doi:10.1038/nclimate2921 http://www.nature.com/nclimate/journal/vaop/ncurrent/full/nclimate2921.html

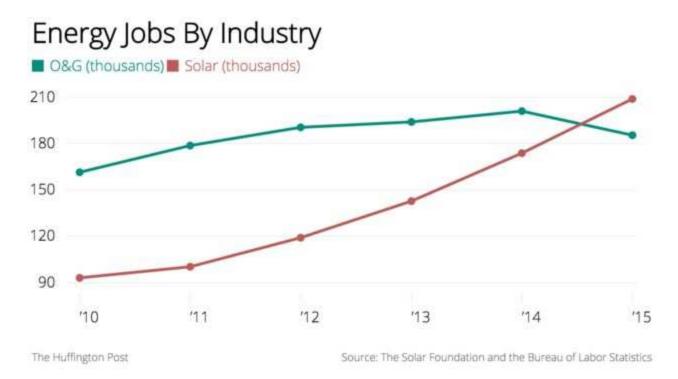
See for example the wind and solar power maps from that article, which show that Florida has more sunlight on average than Georgia (righthand map), and wind power elsewhere (lefthand map) can serve to balance cloudy days in Florida.



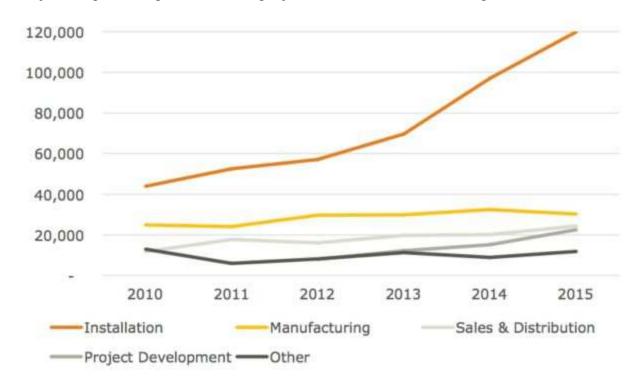
Such power lines could go in existing rights of way, and would not require drilling under any rivers.

And solar power brings local jobs. There are now more U.S. jobs in the solar industry than in all of oil and gas extraction; see "There Are Now More Solar Jobs In America Than Oil Extraction Jobs", by Shane Ferro, Huffington Post, 14 January 2016,

http://www.huffingtonpost.com/entry/solar-jobs-rising us 569409e5e4b0cad15e65be87



Solar jobs keep booming, while oil and gas jobs remain flat or are declining:



That article notes that solar jobs don't pay as well as oil or gas drilling, but on the other hand pipeline installation crews come in from somewhere else and do little for the local economy, while many solar jobs are local, and solar power directly reduces local electric bills.

Suwannee County can lead the way to the clean, safe, profitable solar future of Florida. A good next step beyond the resolution you already passed asking for the compressor station to be moved would be to oppose FPL and Spectra Energy's plan to drill under the Suwannee and Santa Fe Rivers for the unnecessary, destructive, and hazardous Sabal Trail pipeline.

For the rivers and the aguifer,

[S]

John S. Quarterman, President

229-242-0102

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