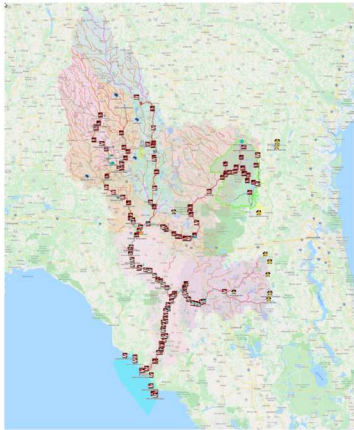
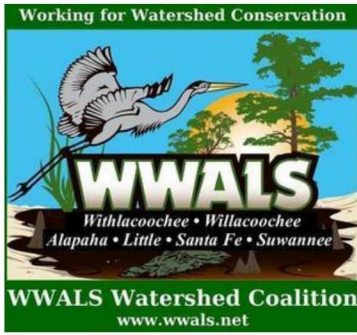


February 6, 2023



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WWALS is an IRS 501(c)(3) nonprofit
charity est. June 2012

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

Suwannee RIVERKEEPER® is a program and a paid staff position of WWALS.



To: Brooks County Commission

Re: **Morven Solar Special Exception**

Dear Brooks County Commissioners and Staff,

In general WWALS is for solar power, and has been working to promote it since 2012.

You are probably aware that we supported the first NextEra solar project in Brooks County, but we opposed NextEra Quitman Solar II, because it was to be built on wooded wetlands. Unlike NextEra Quitman Solar II, Morven Solar appears to have avoided creeks and wetlands.

The Morven Solar project illustrates many issues of deployment of solar power in an agricultural area. As a farmer, on land my grandfather bought in 1921, I do not like to see agricultural fields taken out of production.

As Suwannee Riverkeeper, working to keep the waters clean in the Suwannee River Basin, I have to consider the effects on water of the current agricultural uses compared to the proposed solar power use.

Most of the subject fields are currently in cotton. Cotton as currently grown is one of the crops with the highest uses of pesticides, which can adversely affect humans and wildlife, including washing downstream into waterways such as Slaughter Creek and into rivers such as the Little River, affecting aquatic wildlife as well. Center-pivot irrigation contributes to ever-decreasing groundwater and aquifer levels. Solar farms generally do none of that.

1. Yet solar farms often use herbicides to control grass and other undergrowth. So we recommend Morven Solar graze herbivores instead, or cultivate vegetables alongside or under the solar panels.
2. If Morven Solar uses herbivores, manure runoff must be contained. The livestock must be fenced back from waterways, with vegetative buffers. The vegetated dirt berms already planned should prove adequate for that, as long as their water outlets have sufficient manure traps such as detention ponds. The sediment basins on the draft Erosion Control Plan should be checked and monitored to see if they are adequate for that purpose.
3. In addition to maintaining Peach Road and other dirt roads that will be used by the project, Morven Solar needs to ensure that industrial waste produced by project installation does not get into waterways such as Pike Branch and Slaughter Creek. This appears to be covered by Brooks County's Code of Ordinances, Sec. 18-45. "Minimum requirements for erosion and sedimentation control using best management practices." Compliance would need to be checked and monitored.

Done with such safeguards as numbered above, which the Commission can require as conditions, this solar project could provide upland buffers around the creeks, protecting them and the Little River.

Thank you for your consideration of these issues as conditions,

John S. Quarterman
Suwannee Riverkeeper

Attachment: Map of Slaughter Creek, Morven, Hahira, and the Little River