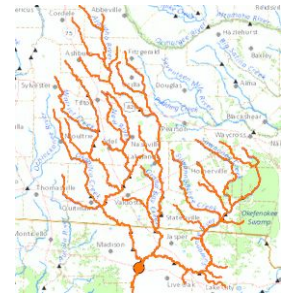


WWALS Watershed Coalition, Inc.
the WATERKEEPER® Alliance Affiliate for the
upper Suwannee, Withlacoochee, and Alapaha Rivers
a 501(c)(3) nonprofit charity
PO Box 88, Hahira, GA 31632
wwalswatershed@gmail.com
www.wwals.net



April 12, 2016

To: Lowndes County Board of County Commissioners,

Re: Sabal Trail pipeline

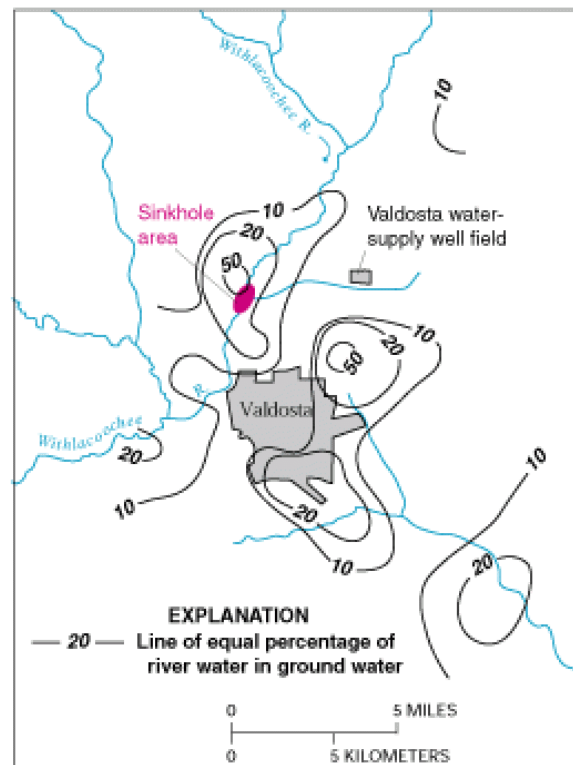
Dear Commissioners,

Sabal Trail may have led you to believe that pipelines are inevitable, but many recent developments show that they are not: the resounding rejection of Sabal Trail river easements by the Georgia legislature, the suspension of Kinder Morgan's Palmetto pipeline across the Georgia coast and the final court loss of its Bluegrass Pipeline in Kentucky, and long delays for three Williams Company pipelines, two of them intended to feed Marcellus Shale natural gas to Sabal Trail through Williams' Transco pipeline.

Therefore WWALS asks Lowndes County to rescind its recent easement agreement with Sabal Trail. The county has a much older contract with the people of Lowndes County and the State of Georgia, in its charter ratified by the same legislature that just voted to deny easements to Sabal Trail.

In any case, WWALS asks Lowndes County to follow the examples of two counties just across the state line in Florida, and invite the U.S. Army Corps of Engineers to come investigate numerous discrepancies in sinkholes, springs, and underground water flow that Sabal Trail did not consider.

As I mentioned at your meeting of March 22nd, that same day the Georgia House of Representatives by a historic margin of 34 ayes to 128 nays rejected river-drilling easements for Sabal Trail, including for the Withlacoochee River where Sabal Trail proposes to drill from Brooks to Lowndes Counties just north of US 84. Two days later, the House passed the same bill



without the Sabal Trail easements, sending it to the governor. That was the last day of the legislative session, and there's nothing about Sabal Trail in that bill for the governor to accept or veto, so there are no Georgia river easements for Sabal Trail.

That same March 22nd, the Georgia House voted for an 18-month moratorium on petroleum product pipelines pending review of environmental permitting procedures. The next week, citing that moratorium, Kinder Morgan "suspended" the other big Georgia pipeline project, the Palmetto petroleum products pipeline from South Carolina across the Georgia coast to Jacksonville, Florida. Kinder Morgan insisted right up until its suspension notice that its Palmetto project was going to happen, just like Spectra Energy keeps insisting Sabal Trail will happen. Local and state opposition stopped Kinder Morgan, and it may still stop Spectra Energy.

Meanwhile, just south of the state line, [Hamilton](#) and [Suwannee](#) Counties, Florida, have formally requested the U.S. Army Corps of Engineers to come see for themselves and to make an independent report about the numerous discrepancies between what Sabal Trail told the Federal Energy Regulatory Commission (FERC) and the numerous additional springs, sinkholes, and underground caverns an independent geologist found. A copy of the Suwannee County, FL letter is attached.

In Lowndes County, we don't need a new geological report to show that Sabal Trail didn't take into account the sinkholes and underground water transmission that caused Valdosta to have to sink its water wells twice as deep. As the U.S. Geological Survey wrote in 1999 about Lowndes County, Georgia and its county seat, Valdosta:

*A highly interconnected conduit system has developed in the Upper Floridan aquifer in this area, which extends **at least 15 miles** from the sinkhole area.¹*

Sabal Trail's proposed drilling path under the Withlacoochee River near US 84 **is less than 15 miles** from the site USGS referred to near Cherry Creek, where Withlacoochee River water from Shadrick Sink leaking into the Upper Floridan Aquifer forced Valdosta to double the depth of its water wells, and led Lowndes County to purchase the land surrounding Shadrick Sink.² Sabal Trail's proposed Withlacoochee River crossing is much closer to some Lowndes County and many private water wells, yet Sabal Trail did not mention any of that to FERC.

Sabal Trail also didn't mention to FERC the Snake Nation Road sinkhole or the hundreds of thousands of dollars it cost the county. Sabal Trail didn't mention the Shiloh Road sinkhole, or all the other sinkholes in lines in the county. And Sabal Trail didn't tell FERC that the possibility of drilling under the Withlacoochee River in Florida causing a frac-out with a sinkhole and leaking into the aquifer, as previously determined by another independent geologist, also applies to the Withlacoochee River here in Georgia.

For a summary of this extensive evidence, please see the [letter from WWALS to the Army Corps](#), copy attached.³

I recommend that the Lowndes County Commission also invite the Army Corps to come investigate what Sabal Trail did not tell them about sinkholes and underground transmissivity in Lowndes County.

¹ "The Connection Between Surface-Water Quality and Ground-Water Quality in a Karst Aquifer", Box E on Page 63 in [Sustainability of Ground-water Resources](#), by William M. Alley Thomas E. Reilly O. Lehn Franke, USGS Survey Circular 1186, 1 January 1999, <http://pubs.usgs.gov/circ/circ1186/>.

² [Lowndes County parcel 0072 023](#), which the county obtained in 2001, http://qpublic7.qpublic.net/ga_display.php?county=ga_lowndes&KEY=0072%20%20023. VSU Prof. Brad Bergstrom assisted with that purchase.

³ "WWALS invites Army Corps of Engineers to inspect and investigate Sabal Trail", 4 April 2016, <http://www.wwals.net/?p=19392>

The address for the Savannah District of the Corps is:

To: Commander, U.S.A.C.E.,
Savannah District
Attn: Mr. Terry C. Kobs
1104 N. Westover Boulevard, Unit 9
Albany, Georgia 31707
(229) 430-8566
terry.c.kobs@usace.army.mil

Cc: Georgia Department of Natural Resources
Environmental Protection Division
Watershed Protection Branch
Attn: James A. (Jac) Capp - Branch Chief
2 Martin Luther King, Jr. Drive
Atlanta, Georgia 30334
404-463-4911
James.Capp@dnr.state.ga.us

Re: Application Number: SAS-2013-00942

Applicant: Sabal Trail Transmission, LLC, Attn Mr. George McLachlan

You may also want to mention the numerous related pipeline projects in Alabama, Pennsylvania, Georgia, and Florida that were that were not considered cumulatively along with Sabal Trail in the Southeast Market Pipelines Project (SMPP). The Corps specifically requests input about cumulative effects.

According to the Savannah District's Public Notice [SAS-2013-00942](#) of September 11th, 2015:⁴

Public Interest Review: The decision whether to issue a permit will be based on an evaluation of the probable impact including cumulative impacts of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefit, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. All factors, which may be relevant to the proposal will be considered including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership and in general, the needs and welfare of the people.

In addition, the U.S. DC Circuit Court of Appeals in 2014 ruled⁵ that FERC according to the National Environmental Policy Act (NEPA) must consider cumulative effects of related pipelines, without segmenting projects. FERC has not considered along with SMPP numerous related pipelines and liquid natural gas (LNG) export projects and proposed power plants that Sabal Trail would feed, even though more than one of those projects were in FERC dockets at the same time as the three parts of SMPP that are the subject of the Corps' Public Interest Review.

⁴ [SAS-2013-00942](#), JOINT PUBLIC NOTICE U.S. Army Corps of Engineers State of Alabama State of Georgia State of Florida, 11 September 2015,
<http://www.sas.usace.army.mil/Portals/61/docs/regulatory/publicnotices/20150911-SAS-2013-00942-Coastal-1012-TCK.pdf>

⁵ Document #1496336, 6 June 2014, U.S. DC Circuit Court of Appeals Case No. 13-1015, DELAWARE RIVERKEEPER NETWORK, ET AL., PETITIONERS v. FEDERAL ENERGY REGULATORY COMMISSION, RESPONDENT,
[https://www.cadc.uscourts.gov/internet/opinions.nsf/30B6F48600A85C1E85257CEF004E34F1/\\$file/13-1015-1496336.pdf](https://www.cadc.uscourts.gov/internet/opinions.nsf/30B6F48600A85C1E85257CEF004E34F1/$file/13-1015-1496336.pdf)

SMPP does include the Transco Hillabee Expansion Project by Williams Company, however the same company also wants to build two feeder pipelines from the Marcellus Shale in Pennsylvania: Atlantic Sunrise and Penneast. Spectra Energy has also bought part of Penneast.

Both Atlantic Sunrise and Penneast were just delayed many months by FERC because of local opposition.⁶ In March, Williams delayed its Constitution pipeline until the second half of next year, also because of local opposition.⁷ In February Kinder Morgan's Bluegrass Pipeline lost its last appeal in Kentucky.⁸

As you can see by these recent examples, pipeline projects fail all the time. None of these pipelines are necessary; remember that already in November 2014, Georgia was recognized as the fastest-growing U.S. solar market.⁹

I ask you to help stop Sabal Trail. In addition to either (or both) rescinding the easement and inviting the Corps to investigate, you can join the hundreds of organizations and thousands of individuals who have already asked the U.S. Congress to call in the General Accounting Office (GAO) to review FERC's permitting processes.¹⁰ And you can ask our U.S. Congress member Austin Scott (GA-08) to join the four Georgia Congress members who have already asked FERC to fix its processes or deny a permit for Sabal Trail.¹¹

Thank you for your consideration.

For the rivers and the aquifer,
[/s]
John S. Quarterman, President

Attachments: [Suwannee County, FL request to U.S. Army Corps of Engineers](#)
[WWALS invitation to U.S. Army Corps of Engineers](#)

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



⁶ "Feds push PennEast, Atlantic Sunrise pipeline deadlines into 2017: Approval timelines are months longer than developers wanted", Roger DuPuis, Central Penn Business Journal, 1 April 2016,

<http://www.cpbj.com/article/20160401/CPBJ01/160339928/feds-push-penneast-atlantic-sunrise-pipeline-deadlines-into-2017>

⁷ "Constitution Pipeline In-Service Date Pushed Back to 2H2017", Charlie Passut, Natural Gas Intelligence, 10 March 2016,

<http://www.naturalgasintel.com/articles/105646-constitution-pipeline-in-service-date-pushed-back-to-2h2017>

⁸ "Bluegrass Pipeline loss big win for landowners: The Kentucky Supreme Court decided not to take up the matter after Bluegrass appealed a lower court ruling," James Bruggers, Courier-Journal, 12 February 2016,

<http://www.courier-journal.com/story/tech/science/environment/2016/02/11/supreme-court-ends-bluegrass-pipeline-battle/80222618/>

⁹ "Georgia is fastest growing solar market," by Mary Landers, SavannahNow.com, 18 November 2014,

<http://savannahnow.com/news/2014-11-18/georgia-fastest-growing-solar-market>

¹⁰ "Support a GAO Review of FERC by sending letters to your state's representative!", Delaware Riverkeeper Network, web form, accessed 12 April 2016,

<http://cqrcengage.com/delawareriverkeeper/app/write-a-letter?0&engagementId=191844>

¹¹ "PROPOSED SABAL TRAIL RAISES ENVIRONMENTAL JUSTICE, HEALTH CONCERNS CONGRESSMAN BISHOP AND GEORGIA HOUSE DEMOCRATS DEMAND ALTERNATIVES", Office of Congressman Sanford Bishop, 23 October 2015, <http://spectrabusters.org/2015/10/24/four-congress-members-demand-sabal-trail-move-off-of-albany-ga/>