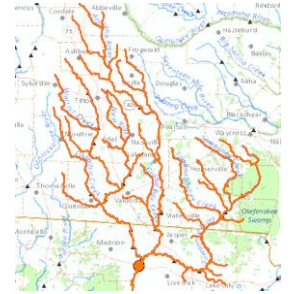


WWALS Watershed Coalition, Inc.
the WATERKEEPER® Alliance Affiliate for the upper
Suwannee, Withlacoochee, and Alapaha Rivers
a 501(c)(3) nonprofit charity
PO Box 88, Hahira, GA 31632
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July 8, 2016

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

Florida:
U.S.A.C.E.,
Jacksonville District Reg. Div.
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

Alabama:
U.S.A.C.E.
Mobile District Reg. Div.
Montgomery Field Office
Attn: Mr. James S. Cherry II
605 Maple Street
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Maxwell AFB, AL 36112-6017
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cesam-pa@usace.army.mil

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

Norman C. Bay, Chairman
Tony Clark, Commissioner
Cheryl A. LaFleur, Commissioner
Colette D. Honorable, Commissioner
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Application Numbers: SAS-2013-00942 (GA), SAJ-2013-03030 (FL), SAM-2014-00655-JSC (AL)

Applicants: Sabal Trail Transmission, LLC, Attn Mr. George McLachlan;
Florida Southeast Connection, LLC, Attn: Mr. Randall LaBauve
Transcontinental Gas Pipe Line Company, LLC, Attn: Ms. Karen Olson

Dear U.S. Army Corps of Engineers, Georgia DNR EPD, and FERC Commissioners,

Please find attached two pieces of new information that add to the reasons for a Supplemental Environmental Impact Statement (SEIS) and for a halt to any Sabal Trail construction until that SEIS is complete. These specific new pieces of information are about Florida, but neither the geology nor the behavior of the pipeline company change at the state line, so the state of Georgia may want to examine what similar information may be available about Georgia before issuing any permit for Sabal Trail.

1. A new hydrogeology report by Peter J. Schreuder P.G.¹ that reveals still more watershed and aquifer vulnerabilities to the Sabal Trail pipeline, which concludes: *“Unless the applicant is required to conduct a thorough and detailed geophysical investigation along the proposed borehole alignment, and all other environmental and cultural concerns associated with the entire length of the proposed pipeline are adequately addressed, this Proposed Project should not be allowed to proceed as designed.”*
2. A jurisdictional wetlands violation letter from WWALS to the Corps about an unlisted pipe yard north of Lake City, Columbia County, Florida,² which appears to contain large quantities of 36-inch pipe, for which there is no known user other than Sabal Trail.

As you know, U.S. Representative Sanford D. Bishop Jr. filed a request for a SEIS with the Corps and with FERC May 27th 2016,³ to which Sabal Trail replied in a FERC ecomment June 7th 2016,⁴ alleging that all the information submitted by Rep. Bishop and by WWALS and by others had already been dealt with in one forum or another. This is clearly not true, since there was for example in the WWALS letter to the Corps of April 4th 2016⁵ information about Georgia that had never been submitted before; more about that later.

Meanwhile, this new hydrogeological report by Peter J. Schreuder P.G. is clearly new information.

The Lake City pipe yard does not appear to be among those listed by John Peconom in his June 28th 2016 order granting Sabal Trail permission to commence pre-construction activities,⁶ nor in any other filing in FERC docket CP15-17. Thus its existence is new information.

John Peconom in his order letter of June 28th wrote:

“This authorization is based on my review of Sabal Trail’s Request for Notice to Proceed; its compliance with the environmental conditions of the Commission’s Order as described in its Implementation Plan filed on March 11, 2016 and April 7, 2016; and its

¹ "Directional Horizontal Drilling (HDD) under the Suwannee River State Park: Hydrogeologic Issues of Concern," by Peter J. Schreuder, Hydrogeologist, Schreuder, Inc. Water-Resources & Environmental Consultants, Tampa, Florida, June 23rd 2016, <http://www.wwals.net/?p=20976>

² "Re: Lake City Pipe Yard in jurisdictional wetlands," WWALS to USACE, July 5th 2016, <http://www.wwals.net/?p=21093>

³ "U.S. Representative Sanford D. Bishop submits comments re Sabal Trail Transmission's natural gas pipeline proposal etc. under CP15-17 et al." by U.S. Rep. Sanford D. Bishop Jr. GA-02, May 27th 2016, FERC Accession Number 20160601-0010, http://elibrary.ferc.gov/idmws/file_list.asp?document_id=14465275

⁴ "Sabal Trail Transmission, LLC submits its Response to Letter from U.S. Representative Sanford D. Bishop, Jr. under CP15-17." by Sabal Trail, June 7th 2016, FERC Accession Number 20160607-5134, http://elibrary.ferc.gov/idmws/file_list.asp?document_id=14467516

⁵ "WWALS invites Army Corps of Engineers to inspect and investigate Sabal Trail," WWALS Watershed Coalition, April 4th 2016, <http://www.wwals.net/?p=19392>

⁶ "Letter order granting Sabal Trail Transmission, LLC's 5/23/16 request to commence pre-construction activities at Contractor Yards 1-1, 2-5, 3-5, 4-1, 5-6, 6-5, and 6-6 etc under CP15-17," by John Peconom, FERC Office of Energy Products, June 28th 2016, FERC Accession Number 20160628-3002, http://elibrary.ferc.gov/idmws/file_list.asp?document_id=14473237

documentation of the necessary federal authorizations applicable to the requested activities.“

This new hydrogeological report is evidence that Sabal Trail is not accounting for all environmental conditions.

If that is a Sabal Trail pipe yard north of Lake City, I would like to see where Sabal Trail requested it from FERC and where FERC approved it. If such documentation does not exist, Sabal Trail has not filed “*documentation of the necessary federal authorizations applicable to the requested activities.*”

In either case, that letter order of June 28th appears premature in light of this new information, and WWALS asks FERC to rescind that order.

In light of these new pieces of information, WWALS reiterates its request for the U.S. Army Corps of Engineers to open a process for a Supplemental Environmental Impact Statement (SEIS) for Sabal Trail.

WWALS asks GA-DNR not to approve any permit for Sabal Trail until a SEIS is complete, at which time the evidence may be overwhelming that no permit should be approved.

Thank you in advance for your attention to this issue. I would appreciate a prompt response.

For the rivers and the aquifer,

[/s]

John S. Quarterman, President

Attachments:

- "Directional Horizontal Drilling (HDD) under the Suwannee River State Park: Hydrogeologic Issues of Concern," by Peter J. Schreuder, Hydrogeologist, Schreuder, Inc. Water-Resources & Environmental Consultants, Tampa, Florida, June 23rd 2016, <http://www.wwals.net/?p=20976>, FERC accession number 20160708-5089, http://elibrary.ferc.gov/idmws/file_list.asp?document_id=14476442
- "Re: Lake City Pipe Yard in jurisdictional wetlands," WWALS to USACE, July 5th 2016, <http://www.wwals.net/?p=21093>, FERC accession number 20160708-5088, http://elibrary.ferc.gov/idmws/file_list.asp?document_id=14476441

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

