

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

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Waterkeeper Affiliate for the Upper Suwannee River