

I am Janet Barrow, a citizen who has followed and participated in the FERC review and permitting process for Sabal Trail Transmission Pipeline (STT) for over 3 years. Studying this process has made me lose faith in the safety of our infrastructure and government agencies like FERC. FERC's website (under "What FERC Does") states that FERC "Approves the siting and abandonment of interstate natural gas pipelines and storage facilities," which is apparently true - it APPROVES them, no matter how risky they are to humans and the environment. I call upon FERC to stop being a rubber-stamp agency for pipelines.

Sabal Trail was approved this year and it is under construction in Florida, Georgia, and Alabama. It is part of Southeast Market Pipelines Project (SMP), owned by Spectra Energy (Enbridge), NextEra Energy, and Duke Power. Sabal Trail is a LIMITED LIABILITY COMPANY. SMP are actually 5 pipelines over 600 miles long, which are in various latitudes with dramatically different communities, ecosystems, vegetation, soils, terrain, climate, and weather patterns. The Environmental Impact Statement did not adequately consider the various conditions along these pipeline routes.

EFFECT ON AGRICULTURE AND RURAL COMMUNITIES

For 33 years, I have lived on a 10,000 acre cattle ranch in Dunnellon, Florida, where my husband is the ranch manager for absentee owners. Six miles of Sabal Trail explosive gas pipeline route go through this ranch. Dunnellon Elementary and High Schools were built on land that was once a part of the ranch. The school buildings are within 1/2 - 1 mile of Sabal Trail pipeline route, in the explosion and evacuation zone. This pipeline causes increased risk and burden to Dunnellon citizens, especially our children.

The City of Dunnellon has a population of about 1800 people. It is deeply in debt and struggles with how to provide fire and police protection and other services. FERC and Sabal Trail provided copies of the EIS to local libraries, so I went to Dunnellon library to review it. I was given a disk, but the Librarian told me that I couldn't read the EIS, because none of their computers had disk drives. Our economically depressed area does not have funds to adequately equip our library. So much for accessibility! I am sure that FERC assumes that since the disks were sent to a couple of dozen libraries, they did their job. They did not.

The Environmental Impact Statement does not consider the potential economic costs for communities like Dunnellon. Sabal Trail's claims about economic impact and job creation are one-sided and misleading. Everyone I have seen working for Sabal Trail is from out of town. There are no new jobs from Sabal Trail for Dunnellon locals. The claim that jobs will be created is a sham.

The six miles of pipeline coming through the ranch this winter and spring could potentially cause economic loss to our community. Sabal Trail claims that only about 80 acres of ranch land will be affected, which sounds great in the EIS, but much more land is impacted. These 80 acres are spread throughout about 15 pastures containing 2,000 acres. When construction occurs in those pastures, they cannot be grazed by cattle. These 2000 acres are 20% of the ranch's grazing land.

Consider this example. If 20% of the forage is unavailable to the cattle, 20% of the herd (or 400 cows) may have to be sold. A ranch spends about \$500/cow/year in the local economy. If 400 cows get sold due to lack of grazing, that means the local economy will lose \$200,000 per year, not just this year, but for many years to come. Local jobs will be lost and day cowboys will lose work. Generally, if cows like this get sold, they will be sold to slaughter and not replaced, especially in today's cattle market. In this example, the money from the sale of the cattle would leave the county. Many ranches are owned by absentee owners, so if the money is not spent on the herd, it leaves the community. It takes years to rebuild the herd, if it ever gets rebuilt. The EIS does not adequately consider the adverse impacts this pipeline has on businesses and communities, such as the impacts described in this real example.

Dunnellon's lifeblood is its springs, rivers, recreation, and rural small town charm. Rainbow Springs, Rainbow River, and the Withlacoochee River are the lifeblood of this ecotourism community. The pastoral beauty that attracted movies and television commercial will now be covered with yellow pipeline markers, ruining the aesthetics. Land values are already dropping, and properties along the pipeline route are now full of "For Sale" signs, and some have been abandoned. Families are upset, and they are wondering how they will be able to sell their biggest investment, their homes, now that they are being forced into being in an explosion zone. Many have said that they cannot ethically sell these properties and put someone else at risk, and they feel trapped, living there themselves.

Dunnellon does not have the resources to respond to any emergency this pipeline brings to our community. The schools are at a huge risk, due to the proximity of the pipeline, which is routed through extremely karstic land. There is only one access road to these schools, which goes north and south, parallel to the pipeline, and it is in the explosion incident exclusion zone. If that road is closed, the path to the east would be blocked by the pipeline, and the path to the west is wooded and the Rainbow River runs about a half mile from the school property, so that is another barrier to evacuation. There could be thousands of injuries and deaths from a Sabal Trail pipeline incident near our schools.

FERC HAS NO CLUE - KARST

It would take hours for me to describe the problems associated with this pipeline being routed through the karst sensitive area. The Sabal Trail Resource Reports and EIS are full of errors, omissions, and inconsistencies. The data is severely flawed. The documents are worded to favor Sabal Trail. They are not objective. Old data was used. Incomplete databases were used. Karst features were falsely described. I tried to have discrepancies I discovered reconciled by the FDEP geologist. I was told that the State of Florida Office of General Council would not allow him to talk to me about Sabal Trail. Other people spent their own money to have independent geological reports done, and those reports contradicted the FERC karst reports. The independent reports have been largely ignored by FERC and the US Army Corps of Engineers. We have been screaming to be heard. The mistakes Cardno, Sabal Trail, and FERC are making will impact our lives.

Nature has a way of having the last word. It has been whispering warnings. We tried to warn FERC, and now the things we predicted - things that Sabal Trail said wouldn't happen - are coming true. There has been a frack-out which occurred when Sabal Trail was boring under the Withlacoochee River in Georgia, and drilling mud was released into the bedrock below the river, which then seeped through the bedrock and into the surface waters of the river, polluting the river. Sabal Trail drilling and construction has caused sinkholes. This is only the beginning of the karst events that will occur because of this pipeline. The frightening thing is that one day one of these events will occur when Sabal Trail is carrying highly pressurized explosive fracked gas at a rate of 1.1 billion cubic feet per day under 1,456 pounds per square inch of pressure. When that occurs, it is likely to irreparably damage our aquifer and our water supply.

FERC AND SABAL TRAIL MEETINGS - NOTIFICATION/PUBLIC PARTICIPATION

Only affected landowners were initially informed of the Sabal Trail Open Houses. Small legal notices in newspapers announcing FERC Scoping and Public Comment Meetings were about as effective as the EIS disks without a disk drive at our library. I read that "before issuing the Environmental Statement, the Commission considered comments from over 350 people who spoke at 23 public meetings, and reviewed over 1,200 letters and comments." Therefore, only one out of every one hundred thousand citizens in Florida, Georgia, and Alabama spoke at the meetings! There are 35,000,000 people living in Florida, Georgia, and Alabama. Florida alone has over 20,000,000 residents. FERC FAILED to adequately notify and solicit public input about Sabal Trail and the Southeast Market Pipelines.

The State of Florida also failed the citizens in this regard. Florida Statute 403.9424 states that "Local governments may hold informational public meetings in addition to the hearings specifically authorized

by ss. 403.9401-403.9425 on any matter associated with the natural gas transmission pipeline siting proceeding." "It is the legislative intent that local governments attempt to hold such public meetings." FERC and the State of Florida BOTH FAILED to notify and solicit adequate public input about another pipeline coming to Florida.

FERC IS A COLLABORATOR WITH THE PIPELINE INDUSTRY, BULLYING PROPERTY OWNERS; FERC CLAIMS SABAL TRAIL IS FOR USE IN FLORIDA, BUT ITS GAS CAN BE EXPORTED. CONGRESS MADE THE LAW, AND CONGRESS NEEDS TO CHANGE THIS BULLYING PRACTICE.

FERC's Certificate of Convenience and Necessity allows citizens' properties to be taken by eminent domain by Sabal Trail, LLC. The Natural Gas Act allows this to happen. This is an outrage to the citizens of this country, especially when the gas transmitted through Sabal Trail pipeline and other pipelines across the country can and will be exported. I attended a public meeting where South Florida Water Management District Governing Board Member, Jim Moran, had a very telling discussion with Eric Olson, Attorney for Sabal Trail with Hopping, Green and Sams, on July 14, 2016, in West Palm Beach. I am not aware of any published official transcript, so I tried to write what was said in the following excerpt. You can listen to the tape yourself at <http://bit.ly/2ewv7DO> (Start video at 6:40:41 for this part exchange.)

JIM MORAN:

WHERE IS THIS PIPELINE GOING? IS IT GOING TO GO DIRECTLY TO AN FPL ELECTRICITY GENERATING PLANT, OR IS IT GOING TO BE USED FOR OTHER PURPOSES AS WELL? EXPORTED?

ERIC OLSON:

THE PIPELINE IS A TRANSMISSION PIPELINE PROCESS. DIFFERENT PEOPLE CAN PAY TO PUT GAS THROUGH THE PIPELINE. I BELIEVE IT IS GOING TO THE MARTIN FACILITY. IT IS ONE OF THE FPL USES. BUT THAT IS THE INITIAL ROUTE OF THE PIPELINE.

JIM MORAN:

BUT EVENTUALLY IT IS A COMMERCIAL LINE THAT CAN SELL THE PRODUCT TO ANYONE IT WANTS.

ERIC OLSON:

IF IT SUBSEQUENTLY HAD APPROVALS TO DO THAT, YES.

JIM MORAN:

IF WE DON'T GRANT THE EASEMENT TODAY, DEP CAN ACQUIRE THE EASEMENT THROUGH EMINENT DOMAIN?

ERIC OLSON:

NOT DEP, BUT SABAL TRAIL COULD. YES.

JIM MORAN:

OH, WHO?

ERIC OLSON:

SABAL TRAIL PIPELINE, THE COMPANY.

JIM MORAN:

THEY CAN INSTITUTE EMINENT DOMAIN?

ERIC OLSON:

YES.

THEY HAVE A CERIFICATE AUTHORIZED,

THEY HAVE THE POWER OF FEDERAL EMINENT DOMAIN VIA THE CERTIFICATE AUTHORIZED BY THE FEDERAL ENERGY REVIEW COMMISSION, AND THEY CAN AND THEY HAVE FILED SUIT IN FEDERAL COURT TO ACQUIRE SOME REMAINING INTERESTS IN THE STATE OF FLORIDA THAT HAVE NOT YET BEEN ACQUIRED VOLUNTARILY.

JIM MORAN:

THAT'S CHILLING TO ME...BUT...AS A LANDOWNER, BUT IN ANY EVENT, THANK YOU FOR YOUR

ERIC OLSON:

IN THIS CASE WE DID NOT WE DECIDED NOT TO PURSUE EMINENT DOMAIN AGAINST THE SFWMD, RATHER THOUGHT THAT IT WOULD BE BETTER TO WORK IT OUT COOPERATIVELY WITH YOUR STAFF TO SAVE TIME AND COSTS AND TO ADDRESS SOME OF THE CONCERNS THAT YOU HAD ABOUT THESE PARTICULAR EASEMENTS THAT WE BELIEVE YOU HAVE.

CONCLUDING REMARKS

I shake my head in dismay and disgust. There are a lot of people in Dunnellon and throughout Florida (Georgia and Alabama, too) that are angry about this pipeline coming through our sinkhole-prone land,

private property, and conservation lands. Other parts of the country are experiencing similar problems. We feel violated and abused. We will not just bend over and take it.

We want solar in the Sunshine State. We already get 2/3 of our electricity from natural gas, and we don't need more. This gas pipeline will be used for export, and people's lands have been taken by eminent domain so this limited liability company can profit. OUR RISK, THEIR REWARD. This is abuse of eminent domain as it was intended. FERC and Congress allow this to happen, and it must stop. Change the laws about eminent domain, and change the laws to require expanded notification and public participation in the process of siting gas pipelines. Investigate FERC for its rubber stamping and poor oversight of these pipeline projects.

We realize that the problems with the FERC's review and permitting of the energy industry in Florida will not end with Sabal Trail. More pipelines, liquefaction plants, LNG export facilities and ports, fracking, and rail transport of LNG are all planned by energy corporations for our environmentally sensitive unique Florida terrain and our shorelines, our cities and our remaining rural and conservation lands. It looks like we will be dealing with FERC for a long time, and we want more from them. FERC needs stop rubber-stamping approval for pipelines. I join with the others calling for a Congressional Review of the Federal Energy Regulatory Commission.

Sincerely,

Janet Barrow