



St. Marys River Management Committee

Post Office Box 251 • Folkston, GA 31537

May 23, 2011

Mr. Ade Oke
Georgia Environmental Protection Division
4220 International Parkway, Suite 101
Atlanta, GA 30354

Re: Miocene Holdings surface water withdrawal permit

Dr. Mr. Oke:

On behalf of the St. Marys River Management Committee, please accept this letter of concern regarding the Miocene Holdings surface water withdrawal permit application under consideration by your office. The St. Marys River Management Committee is an intergovernmental entity of elected and appointed members from four counties along the St. Marys River including Charlton, Camden, Nassau and Baker counties.

The Committee is very concerned about the detrimental impacts to the St. Marys River that would likely occur as a result of the implementation of the Miocene Holdings project. The proposed project would remove 350,000 gallons of water per day from the St. Marys River, filter the water to remove the natural tannins, and then return the filtered water to the river. The removed tannins will be used as a soil amendment for agricultural purposes.

As a public advocate for the St. Marys River, the Committee has numerous concerns about this proposed project. From a water quantity perspective, the Committee is concerned about the volume of water to be removed from the river. The location selected for the removal of the water (the North Prong of the river) is a historically low-flow area and monitoring data suggests that the proposed withdrawal amounts could periodically exceed the volume of total flow at the proposed withdrawal sites. Vague language in the permit application about suspending operations during low water periods does little to ameliorate this concern, especially in the absence of any metric for determining what constitutes low water.

From a water quality perspective, the Committee is especially troubled about the impacts of discharging this filtered water to the river body. The St. Marys River is a high-quality blackwater river with a naturally low pH. The dark color of the water comes from decaying peat and other vegetation that produce tannin, a naturally occurring, water-soluble organic compound. By filtering the water to remove the tannins, Miocene Holdings will be altering the fundamental characteristics of the river's water. Discharging water treated to a regulatory pH level of 7 into a low-volume blackwater stream with a natural range of pH 3.8 - 4.2 would have significant negative impacts on the river's ecological functions and native flora and fauna.

The St. Marys River Management Committee is an intergovernmental entity of elected and appointed members from the four counties fronting the river: Charlton and Camden, GA, and Nassau and Baker, FL. The committee advises the four county commissioners and provides a public forum on issues concerning the St. Marys.

In addition, the proposed industrial filtration process could also further deplete dissolved oxygen levels in water being returned to a river system already naturally low in dissolved oxygen.

Finally, as the St. Marys River serves as the boundary between Georgia and Florida, the Committee believes that the approval of this permit inevitably invites another interstate conflict over the use of shared water resources. The water quality and quantity issues that would almost certainly occur as a result of the Miocene project will impact both sides of the river. County commissioners and Committee stakeholder representatives from both states are fielding a groundswell of community response to this proposal and the public comments are overwhelmingly negative.

Because of these concerns, the Committee is requesting that the Georgia Environmental Protection Division NOT issue a withdrawal permit to Miocene Holdings LLC.

Sincerely,

A handwritten signature in blue ink that reads "Chip Campbell". The signature is written in a cursive, flowing style.

Chip Campbell, Georgia Co-Chair

St. Marys River Management Committee