

St. Marys River Management Committee

Post Office Box 251 • Folkston, GA 31537

Baker County Board of County Commissioners
55 North 3rd Street
Macclenny, Florida 32063

August 9, 2012

Re: Baker County Consumptive Use Permits (CUP)

Dear Commissioners: The St. Marys River Management Committee (SMRMC) was established by an interlocal agreement between the four counties that share the St. Marys River: Baker and Nassau counties in Florida and Camden and Charlton counties in Georgia. We are a stakeholder group of representatives appointed by the county commissions: two landowner representatives and two at-large, plus a commissioner from each of the four counties. We represent a diversity of interests and perspectives, reflecting the communities we represent.

In addition to serving as an advisory council to the counties and a liaison between state agencies and the St. Marys River communities, the county commissions charged us with a specific task: to develop a river management plan that achieved, through locally controlled and implemented programs and ordinances and with respect for private property concerns, some of the long-term conservation objectives intended by a Wild and Scenic status without the federal strings attached – and then to advise the counties in the implementation of that plan. Our goal is to encourage a cooperative, coordinated management of the river driven by locally-developed and implemented strategies.

The St. Marys River is a low volume, highly oligotrophic waterway with a small watershed. Simply put, its waters are limited in supply and in their ability to absorb the impacts of our use. The SMRMC submits that the counties have priority interests in what is a highly local resource and, consequently, in retaining local use and control of that shared resource.

It is the consensus of the St. Marys River Management Committee that there are the following concerns:

Baker County has two different locations that propose hydraulic mining.

Old Castle Southern Group (Old Castle) has already submitted a permit application to the SJRWMD Consumptive Use Permit (CUP) # 2-003-13026-1. The Water Quantity Committee has reviewed the SJRWMD application including attached materials and the Request for Additional Information (RAI). The SMRMC concurs with the RAI request and would like to note that Comment 5 is asking for confirmation that this is in fact the Lower and not the Upper

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

Floridan Aquifer as their water source. We recommend, because of the close proximity of the head waters of Turkey Creek, and because of the proximity of the City of Macclenny well-field (and the use of a 1995 water drawdown model), Old Castle should be requested to monitor the impacts to the existing Macclenny permitted CPU, and Turkey Creek flow rates.

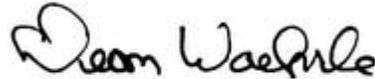
The E.R. Jahna Industries, Inc. (ERJI) has not applied for a permit nor provided any information to review. Their withdrawal is also a concern because of the over withdrawal from the St. Marys River Basin. Without their willingness to provide data, we cannot fully analyze the potential impacts.

Regarding ERJI, which is outside the purview of the SMRMC, is the fact of the impacts to the local residences within Baker County. Our Water Quantity Subcommittee has contacted Dr. Christopher Brown from the University of North Florida, who is with their Department of Civil Engineering. The University is willing to analyze this situation at no cost because they believe it may be a problem for the local citizenry.

Respectfully,



Chip Campbell, Georgia chair
stmarysriverinfo@gmail.com



Dean Woehrle, Florida chair

cc: St. Johns River Water Management District, ATTN: Caroline Silvers

Attachment: SJRWMD May 1, 2012 RAI