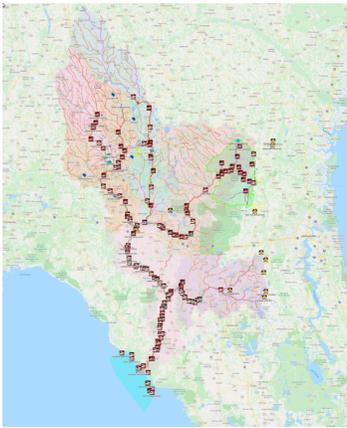
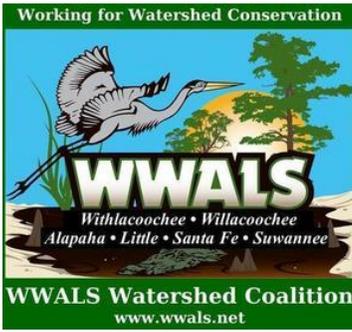


August 5, 2021



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WWALS is an IRS 501(c)(3) nonprofit charity est. June 2012

*WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.*

*Suwannee RIVERKEEPER® is a program and a paid staff position of WWALS.*



To: Matt Martin, Valdosta City Planner, [mlmartin@valdostacity.com](mailto:mlmartin@valdostacity.com)  
Re: Please deny VA-2021-16 Deannexation Request by Uvalde Land Company  
Dear Planner Martin,

WWALS Watershed Coalition, Inc. asks the Valdosta Mayor and Council to deny deannexation of half of the Cherry Creek Mitigation Bank (CCMB) in VA-2021-16 at its meeting this Thursday, August 5, 2021. As you know, the Greater Lowndes Planning Commission (GLPC) already voted 6-3 to recommend against deannexation.

Given the lack of any good reasons by the applicant for deannexation of that 310 acres of Withlacoochee River floodplain around Cherry Creek, let me remind everyone of some reasons not to deannex.

The CCMB is directly across the Withlacoochee River from Shadrick Sink. Valdosta already had to sink its water wells on Guest Road twice as deep because of river water going into Shadrick Sink, then through ground water several miles east to those wells. The choice was to pay for much more expensive methods to deal with tannic acid and biological components of the river water, or dig the wells deeper. This is literally a textbook case: [Sustainability of Ground-water Resources](#), by William M. Alley Thomas E. Reilly O. Lehn Franke, 1 January 1999, U.S. Department of the Interior, U.S. Geological Survey – Publisher. In [Box E on Page 63](#):

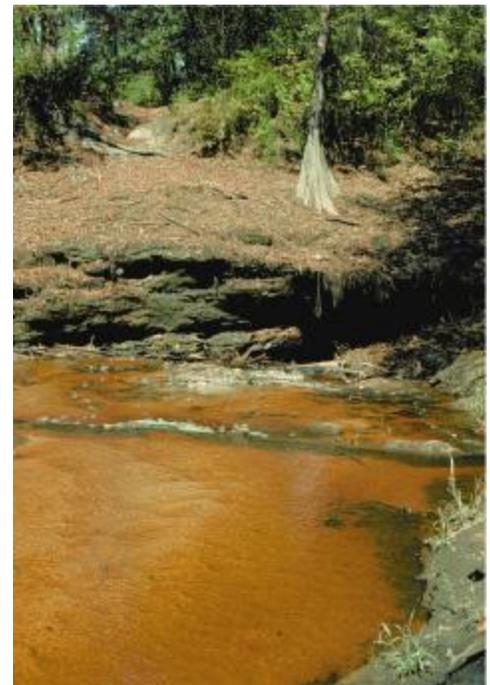
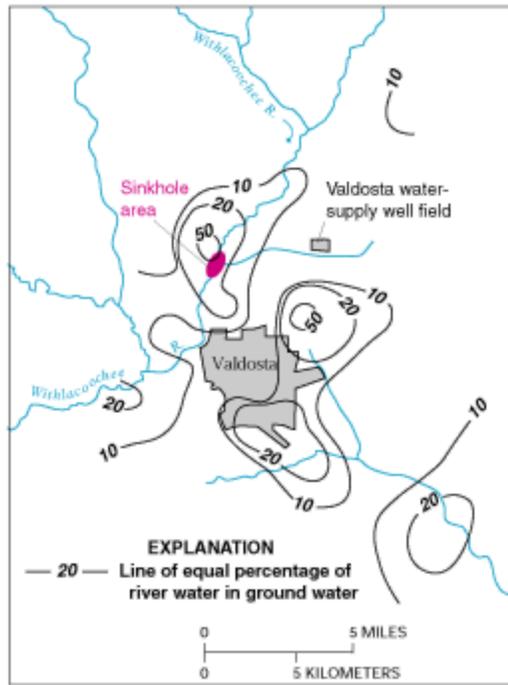
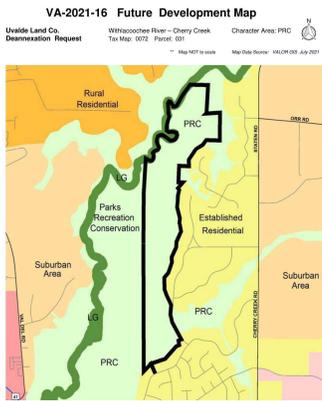


Figure E-1. Estimated percentage of Withlacoochee River water in ground water in the Upper Floridan aquifer, June 1991. (Modified from Plummer and others, 1998.); Sinkhole near the Withlacoochee River. (Photograph by Richard E. Krause, U.S. Geological Survey.)

*“The Upper Floridan aquifer, which is the sole source of water supply for Valdosta, Georgia, and much of the surrounding area, receives large volumes of direct discharge from the Withlacoochee River through sinkholes in the streambed or off-channel. A highly interconnected conduit system has developed in the Upper Floridan aquifer in this area, which extends at least 15 miles from the sinkhole area.*

...



*“The strong connection between the Withlacoochee River and ground water in the Valdosta area has created concerns about the potential for contamination of ground-water supplies by contaminants in the river.”*

Another sinkhole [opened up at the bottom of Cherry Creek in a matter of months in 2013](#), documented by VSU Geology Professor Don Thieme.



As we all know, other sinkholes have opened up, including west of Shadrick Sink and Val Del Road in the back of Moody Family Housing, and farther west on Snake Nation Road, where Lowndes County ended up spending half a million dollars to reroute the road, plus of course at the Sabal Trail pipeline drill site south of US 84 off of Martin Lane. Land disturbance in the Cherry Creek Mitigation Bank could cause another sinkhole.

It wouldn't even take a sinkhole for disturbed hydrology to contribute to flooding, which is already a big problem, for inundation and for sewage spills.

As one of the donors of that same land to the University of Georgia said back in 2008, “Water is the gift that keeps on giving. We couldn't think of a better way to say thank you. If we don't have clean air to breathe and clean water to drink, what have we accomplished?” ([Valdosta Daily Times, January 19 2008.](#))

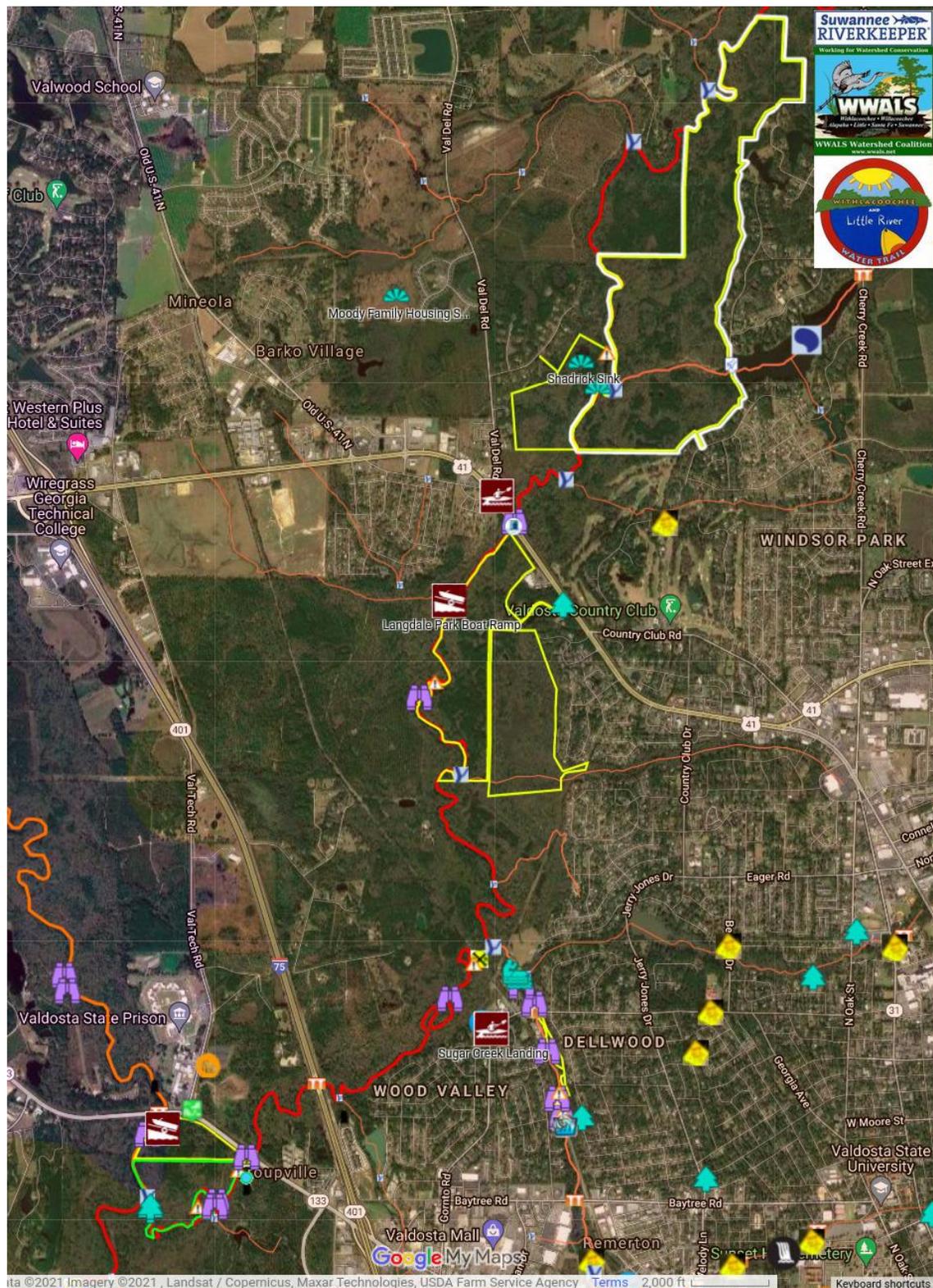
That same VDT story said the land was valued at \$2.5 million (\$4,715/acre) in 2007 when Cherry Creek Properties gave it to the Arch Foundation of the University of Georgia. Yet in 2020 UGA, without ever listing the property publicly for sale, sold it for \$106,000 (\$200/acre). I don't know why a public university sold off that land privately for barely more than 4% of its former value. It would seem mere due diligence on the part of the City to find out before approving any further modifications to the status of that land.

The U.S. Army Corps of Engineers (USACE) was involved in the original implementation of this Bank, and in 2016 and 2017 there was correspondence with the Corps by Corblu Ecology Group LLC (Corblu) on behalf of the bank sponsor, Cherry Creek Properties. Corblu acknowledged erosion by unauthorized ATV use, trash left by people fishing on Cherry Creek, and “a lack of woody riparian vegetation was observed along approximately 400 feet of the left bankfull bench constructed on Cherry Creek.” Corblu said it would replant a variety of trees and shrubs in that area, which is well within the proposed deannexation property. What is the status of that replanted area, and of the other measures Corblu told the Corps were in process? Deannexation would mean Valdosta would lose most of its direct influence about such matters.

We ask Valdosta not to approve deannexation without a really good reason. No such reason has been given, and there are many good reasons not to deannex.

**Add the Cherry Creek Mitigation Bank to a Withlacoochee River trails system**

Instead, Valdosta or Lowndes County or VLPRRA should purchase the entire 530.24 acre property down to the Withlacoochee River to add to a trails system up and down the Withlacoochee River.



*Cherry Creek Mitigation Bank, Withlacoochee River to future Troupville River Camp in the WWALS map of the Withlacoochee and Little River Water Trail.*

As you wrote in the GLPC agenda sheet, the property “is located within the **Parks / Recreation / Conservation (PRC)** and the **Linear Greenspace /Trails (LGT)** Character Areas on the Future Development Map of the Comprehensive Plan”... Your suggestion of annexing the rest of that parcel into the City of Valdosta is interesting.

However, further annexation would not be necessary for integration of the property into a series of land and water trails along the Withlacoochee River, linking up with the county-owned land

on the west (right) bank around Shadrick Sink off of River Chase, and across North Valdosta Road (US 41) with Langdale Park, the largest park of the Valdosta-Lowndes County Parks and Recreation Authority (VLPRA). Langdale Park is only partly within the Valdosta City limits; none of its extensive river frontage is inside the city. All these are already on the [Withlacoochee and Little River Water Trail](#) for boating.

The CCMB land is different, of course, being next to established residential neighborhoods, with their own access written into the CCMB Covenant. Any such park plan needs to be done in conjunction with the local homeowners. And of course a land trails system does not have to be continuous, for example it would not cross the Country Club between the CCMB and Langdale Park.

Such a trails system would help preserve those pristine wetlands by letting people who appreciate them experience them and help keep them clean. It could link up with the existing VLPRA Troupville Boat Ramp Park off of GA 133, between the Little and Withlacoochee Rivers, and [the proposed Troupville River Park](#) down to the Little River Confluence.

Austin, Texas, is turning its urban Waller Creek into a [Waterloo Greenway](#) of linked parks and trails down to the Colorado River.

Austin is a much bigger city, but because of that it has a much harder problem. I bet Austin cannot buy any land for \$200/acre. The One Valdosta-Lowndes initiative recently listed Troupville River Camp as number one on its top 20 list. A trails system all the way there from Cherry Creek would be a jewel for Valdosta and Lowndes County, supporting recreation and quality of life of the existing population, and drawing businesses and employees such as the city, the county, and the Development Authority say they want to attract.

There are far too many unanswered questions about this deannexation and potential uses of the subject property. The City of Valdosta should deny the deannexation request.

Further, the City, or Lowndes County, or VLPRA, or some other such organization, should purchase the entire subject property down to the Withlacoochee River and incorporate it into an extensive riverine land and water trails system.

Thank you for your consideration,

John S. Quarterman  
Suwannee RIVERKEEPER®  
/s  
WWALS Watershed Coalition, Inc.