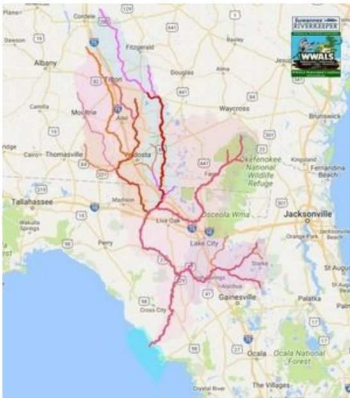
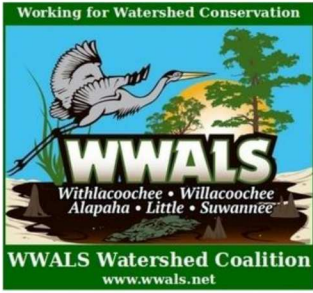


March 8, 2019



PO Box 88, Hahira, GA 31632  
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[wwalswatershed@gmail.com](mailto:wwalswatershed@gmail.com)  
[www.wwals.net](http://www.wwals.net)

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



To: EPD.Comments@dnr.ga.gov  
Elizabeth Booth, Environmental Protection Division  
Watershed Protection Branch,  
Watershed Planning & Monitoring Program,  
Suite 1152 East, 2 Martin Luther King, Jr., Dr., Atlanta, GA 30334

Cc: Victoria Adams <[Victoria.Adams@dnr.ga.gov](mailto:Victoria.Adams@dnr.ga.gov)>, 404-463-4955

Re: Water Quality Standards 2019 Triennial Review  
[https://epd.georgia.gov/triennial-review-water-quality-standards#\\_TR\\_2019](https://epd.georgia.gov/triennial-review-water-quality-standards#_TR_2019)

Dear EPD,

I write to request three changes in the 2019 Triennial Review:

1. All rivers and many lakes and swamps in the Suwannee River Basin should be designated Recreational, not Fishing.
2. Boating, especially in paddle craft such as canoes, kayaks, and paddleboards, should be considered primary recreation, not secondary.
3. Water quality standards should be the same year-round, not lower in winter.

**Point 1: Recreational designation for the Suwannee River Basin.**

- WWALS schedules at least one paddle outing each month; often two or three. <http://wwals.net/events-2/outings-events/>
- Numerous individuals, families, and clubs fish and paddle on our rivers and other waterbodies in every month of the year, plus cave diving in our springs.
- People come from as far as south Florida and Canada to paddle on our rivers.
  - Canadians shivering on the Suwannee River in Echols County on a cold March 2017 winter day came back again. <http://wwals.net/?p=42583>
  - Three kayakers from south Florida paddled our Withlacoochee River from our most upstream water trail landing downstream into Florida.
  - A kayaker from the Atlantic coast of Florida won our Sixth Annual BIG Little River Paddle Race in 2018, finishing on Reed Bingham State Park Lake.
  - Paddle Georgia will bring about 300 paddlers from Georgia, Florida, and beyond to our Withlacoochee River in June 2019. <http://wwals.net/?p=48289>
- There are water trails on all the main rivers of the Suwannee River Basin in Georgia: the Suwannee, Alapaha, Withlacoochee, and Little, including several lakes, as well as in the Okefenokee Swamp. <http://wwals.net/blog/water-trails/>
- These water trails are encouraging more people to paddle on our rivers, lakes, and swamps, improving the cleanliness of our waters and the safety of boating. See for example the unsolicited testimonial from Lanier County Emergency Management, "Alapaha River Beauty should Not be Hidden." <http://wwals.net/?p=43742>
- The Suwannee, Alapaha, and Withlacoochee Rivers have mercury TMDLs that limit fish consumption, so Fishing seems an inappropriate classification.



**Point 2: Boating should be considered primary contact recreation.**

Your slide 5, DESIGNATED USES, for the February 2019 Public Hearing, lists:

- Drinking Water
- Recreation – Primary Contact
- Fishing - Propagation of Fish, Shellfish, Game and Other Aquatic Life and Secondary Recreation
  - Primary Trout
  - Secondary Trout
  - Warmwater
- Coastal Fishing
- Wild River
- Scenic River

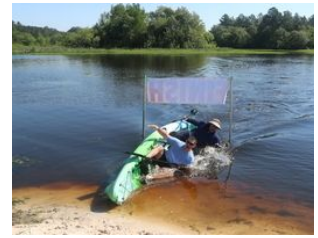


From our south Georgia perspective, this seems a very strange ordering. All our streams are warm water, which is why people fish in them year-round for catfish, bass, and bream.

People also boat on our waters year-round, largely because they are warm water.

In our Suwannee River Basin rivers, and in many others in the state of Georgia, boating, especially paddle boating, involves direct contact with the water.

- a. Water drips from the paddle.
- b. Getting in or out of the boat often involves wading.
- c. Every WWALS outing is also a cleanup, involving retrieving trash into the boat, along with some water.
- d. In warm weather, boaters often swim during a paddle.
- e. Because of overhanging branches, deadfalls, shoals, and other reasons, falling in is so common in every season of the year that WWALS even has a Fallers Award.



Pictured are two such award winners, [from our 2018 BIG Little River Paddle Race](#).

Thus warm water should be considered a reason for listing streams, lakes, and swamps as “Recreation – Primary Contact” and all our streams and waterbodies in the Suwannee River Basin should be so listed.

### **Point 3: year-round water quality standards**

Thank you for this listing in your presentation slides from the February 2019 Public Hearing:

- Big Creek/Laura S. Walker Lake should be in the Satilla Basin

Indeed, the southeast side of the Okefenokee Swamp is in the Satilla and St Marys River Basins, while the rest is in the Suwannee River Basin. This distinction is common knowledge among those of us who live in south Georgia.

As Suwannee Riverkeeper, I report that people boat in the Okefenokee Swamp and the Suwannee River every month of the year, as well as on the Alapaha, Little, and Withlacoochee Rivers, and on Banks Lake and Reed Bingham State Park Lake. They also fish, swim, and dive in November through April, when the current Georgia Bacterial Standards are lower.

[https://adoptastream.georgia.gov/sites/adoptastream.georgia.gov/files/related\\_files/document/B\\_Ch\\_1.pdf](https://adoptastream.georgia.gov/sites/adoptastream.georgia.gov/files/related_files/document/B_Ch_1.pdf)

For seven years, we have held our BIG Little River Paddle Race in April, and last year we held a new WWALS Boomerang Paddle Race in November on the Withlacoochee River.

### **Boating, swimming, fishing, and diving are economic advantages**

In addition to the environmental benefits of clean waters. The WWALS water trails have letters of support from tourism authorities, chambers of commerce, city councils, and county commissions, attesting to the economic advantages of water trails. Several county Comprehensive Plans, including those for Lowndes and Brooks Counties, also attest to the economic value of our waters and water trails. <http://wwals.net/blog/water-trails/>

There are not many cleaner economic benefits, and few requiring less public investment. The entire Suwannee River Basin is above the porous coastal plain limestone that contains the Floridan Aquifer, which is the source of all our drinking water, irrigation for agriculture, water for industry. River water interchanges with groundwater, so river water quality is essential for everything here, from boating to brewing beer. Please reclassify our rivers as Recreational, and update the Georgia Bacterial Standards to be the same year-round.

Sincerely,  
John S. Quarterman,  
Suwannee Riverkeeper,  
WWALS Watershed Coalition  
850-290-2350, 229-242-0102  
[contact@suwanneeriverkeeper.org](mailto:contact@suwanneeriverkeeper.org)

Attachments: **Map of Landings on all Suwannee River Basin Rivers in Georgia**

Criteria for Changing Recreational Use for:

**Suwannee River, Okefenokee Swamp**

**Alapaha River, Lake Irma, Banks Lake, Grand Bay**

**Withlacoochee River**

**Little River, Reed Bingham State Park Lake**