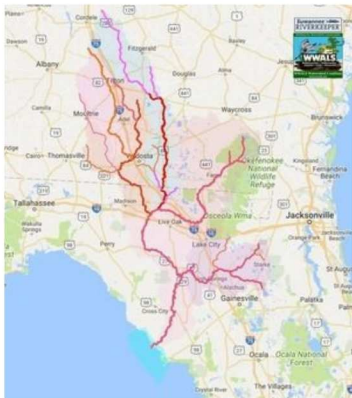
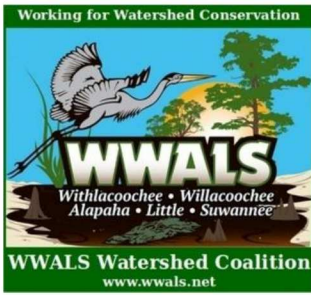


May 31, 2019



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



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Re: Triennial Review of Water Quality Standards

In addition to the letter from Waterkeepers Florida, Suwannee Riverkeeper would like to add requests for no limits to be raised for any pollutants in Florida's waters, for more water quality testing, and for timely publication of all testing results..

Inland where there may be no cyanobacteria blooms, water quality is still important in our springs, rivers, lakes, and swamps. We recommend frequent, regular, water quality monitoring up and down all our rivers.

The Florida Department of Environmental Protection (FDEP) has added DNA testing and tests for sucralose and other markers of human waste to its monthly water quality monitoring at three locations: the Withlacoochee and Alapaha Rivers at the Georgia-Florida state line, and at the Withlacoochee Confluence with the Suwannee River at Ellaville, according to Tom Frick, Director, Division of Environmental Assessment and Restoration (DEAR), at a meeting in Orlando on April 15, 2019, between FDEP and Waterkeepers Florida. These tests will help with determining how much of the E. coli and Fecal coliform contamination found in these rivers comes from Valdosta sewage spills, septic tanks, wildlife, livestock, or domestic pets. I congratulate FDEP on adding these tests. One other test for surface waters that we recommend is for caffeine. Various studies have shown that it can be useful chemical marker for raw sewage. Caffeine data will be good complement to sucralose measurements that target both raw and treated waste.

FDEP also does bacterial and other water quality monitoring monthly at those same locations and four more in the Suwannee River Basin, plus two more elsewhere in the Suwannee River Water Management District (SRWMD), according to email from John Calhoun, Director, Office of Public Services, FDEP, on February 21, 2019, to Merrilee Malwitz-Jipson, answering her inquiry. His letter began:

"The Governor's Office received your letter with concerns about the Valdosta spills into the Withlacoochee and Alapaha river systems and has asked that FDEP respond on their behalf. First, I assure you that we are committed to monitoring and stopping this recurring problem."

His letter also said:

"FDOH has jurisdiction to issue public health advisories, but they do not allow for enforcement actions directed at the source of sanitary sewer overflows, nor for routine water quality surveillance for sources of river water contamination."

The Florida Department of Health (FDOH) may be so constrained, but FDEP is not. We need *"routine water quality surveillance for sources of river water contamination."*

According to both Director Calhoun and Director Frick, those monthly FDEP monitoring results are not published until four months later. This means that the FDEP results for the month of December 2018, when Valdosta spilled six million gallons of raw sewage, were not available until April 2019. Apparently some of those FDEP results were relayed to FDOH, which was useful for public health advisories. However, the public and independent scientists could not review that data. For example, the WWALS Science Committee is attempting to correlate water quality data from a variety of sources with rainfall, river flow, and other parameters. This is not possible unless the data are available.

Therefore I urge FDEP to publish that monthly data in a timely manner, in days, not months,