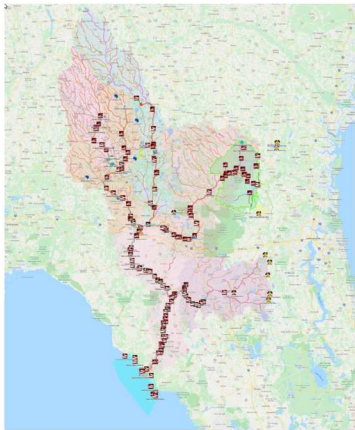


June 30, 2021

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

Re: Georgia Triennial Review of Water Quality Standards



PO Box 88, Hahira, GA 31632
850-290-2350
wwalswatershed@gmail.com
www.wwals.net

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.



Dear Ms. Booth,

Once again I would like to commend you and all the GA-EPD staff for your diligence in this Triennial Review process. I thank you for your consideration of the request by WWALS Watershed Coalition, Inc. (WWALS) to upgrade GA EPD's designated use of the Little, Withlacoochee, Alapaha, and Suwannee Rivers, as well as Grand Bay WMA, Banks Lake NWR, and the Okefenokee NWR, from Fishing to Recreational, to set higher water quality standards for these bodies of water.

In the interests of saving you and me time, I will try to merely summarize the arguments I have already made, while adding some material you may not have previously seen.

Year-Round

As you know WWALS would prefer that redesignation applied uniformly, year-round. As you mentioned in the recent EPD zoom meeting on this subject, perhaps one reason Florida has all its rivers as Recreational by default is its climate. South Georgia, like north Florida (and unlike north Georgia) has a subtropical climate in which we are not surprised by 80-degree weather in January. People swim, dive, fish, and boat on our rivers year-round. Some people even prefer to be on and in the water in the winter because there are fewer insects. I have recently been reminded that local churches also use them for immersion baptisms, which can happen in any season of the year.

Recreational Data Spreadsheet

Per request of EPD, please find attached a Recreational Data Spreadsheet, which is also online here:

<https://drive.google.com/file/d/1g9gLcNnbRx4H9djZA1Kd1ZaB7zrlmDbz/view?usp=sharing>

In that spreadsheet are examples of swimming and diving locations, including almost every boat ramp or landing, plus selected sandbars, beaches, and springs. Also included are a few examples of rapids. None of them are Class III, but at least two are Class II+, and as Gwyneth Moody pointed out on the recent zoom, people frequently capsize in those.

Included for every location in that spreadsheet is a link to further information, mostly to one of our three river trails ("blue trails"):

- Alapaha River Water Trail (ARWT), including Grand Bay WMA and Banks Lake NWR, <https://wwals.net/maps/alapaha-water-trail/>
- Withlacoochee and Little River Water Trail (WLRWT), <https://wwals.net/maps/withlacoochee-river-water-trail/>
- Suwannee River Wilderness Trail (SRWT), extended into Georgia, including the Okefenokee Swamp, <https://wwals.net/maps/suwannee-river-wilderness-trail/>