

Those last two updates note that apparently the Best Management Practices the cattle owners are doing (fencing cattle back from the waterways, adding vegetation at fences, etc.) are working, judging by contamination levels this year being far lower than last year during similar rain events.

WWALS will come back to the Little River in a different year, although you may receive letters continuing to recommend redesignating the Little River as Recreational.

However, we have included in our Recreational Data spreadsheet information about Troupville Boat Ramp on the Little River, which is a key put-in for boating and swimming on the Withlacoochee River, including downstream as far as Tiger Creek. Troupville Boat Ramp is also central for the nearby planned Troupville River Camp and Troupville River Park which are further discussed below.

We have included all Georgia landings on the Withlacoochee River in the WLRWT, and all Georgia landings in the ARWT. This is partly because to get to the river stretches EPD wants to consider this year, it is necessary to start at landings upstream. It is also because we do not agree with EPD's guideline of excluding stretches 10 miles downstream from an NPDES permit outfall. There are no outfalls for many Little River miles upstream of the Little River Confluence just below Troupville Boat Ramp. EPD has pointed to aerial maps showing agriculture near the Little River, but the water quality results do not support that as a significant problem. Of the other outfalls, Nashville and the Boys Ranch on the Withlacoochee River, and the Cities of Alapaha, and Lakeland on the Alapaha River, have not reported any sewage spills since 2015 or earlier. Valdosta has not had a spill get into a river (Withlacoochee or Alapaha) since December 2019, and, as noted above, the contamination events we see these days are most frequently from cattle manure runoff.

Instead of depending on circumstantial evidence, we prefer to depend on direct measurements of water quality, for which see the copious, current, water quality data summarized above. Plus there are substantial investments to consider.

## **Investments**

The ARWT and/or the WLRWT as local and regional recreational, economic, and conservation assets are mentioned in the Comprehensive Plans of Lowndes County, Brooks County, Cook County, Lanier County, and Atkinson County.

As EPD has mentioned, the City of Columbus has managed to keep the Chattahoochee River through that city under consideration for redesignation because of its investments there. There are quite a few investments in stretches of the Withlacoochee River near Valdosta, and in the Alapaha River near Lakeland, as detailed in our Recreational Data spreadsheet. Plus For all these reasons, WWALS does not agree with GA-EPD's proposed exclusion from this round of Recreational redesignation of all of the Little River and all of the Withlacoochee River except downstream of Tiger Creek, a bit below US 84. The EPD guideline of excluding stretches 10 miles downstream of an NPDES wastewater location is irrelevant to these rivers.

Our Recreational Data spreadsheet frequently mentions the recent GA-DNR grant that funded WWALS to produce physical signs at the water at many ARWT and WLRWT locations; see <https://wwals.net/pictures/2020-09-26--drafts-metal-signs> That GA-DNR grant also funded WWALS to design and print 10,000 copies each of z-fold ARWT and WLRWT brochures, which are being distributed by WWALS and many cities and counties and businesses, as well as at rest stops and welcome stations up and down I-75 and I-95 in Georgia and Florida.