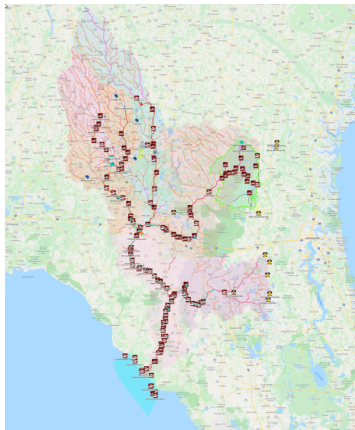


June 30, 2021

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



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/1g9gLcNnbRx4H9djZAIKd1ZaB7zrlmDbz/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/>

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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.



People stop to swim at many more places than those listed in the WWALS Recreational Data spreadsheet. Which places vary with water levels (a good sandbar can be underwater and another can be accessible), with the insects (more bugs, more swimming), with the speed of outing (some people swim practically every river mile), and with other factors (some people prefer deep pools instead of beaches). I apologize for not including any specific baptism sites. Any riverside near a church is a likely spot, plus places like Folsom Bridge on the Little River west of Hahira, so baptism can happen anywhere on a river.

Water Quality Testing

Speaking of the Little River, I appreciate the time EPD staff have taken to point to agricultural lands near that river. However, according to bacterial water quality tests by WWALS and others, the Little River actually is almost always cleaner of *E. coli* than the Withlacoochee River. Only rarely do we find contamination in the Little River, and that is usually after big rains. After the same rains, the Withlacoochee River almost always shows bigger effects.

Please see attached our WWALS composite spreadsheet of water quality data from multiple sources, also including rainfall at multiple locations, and sewage spills reported by GA-EPD. It includes Valdosta's thrice-weekly test results on 40 Withlacoochee River miles to the GA-FL line, as required by GA-EPD Consent Order, as well as tests by several Florida Agencies, WWALS, data EPD requires Lowndes County to collect, and some spill followup tests by NPDES permit holders. The composite spreadsheet got so large we had to break it into two parts.

1. 2021, being continually updated here:

https://docs.google.com/spreadsheets/d/1L_W-1B8Sfe04UKdO5ufexq3OVMYG_0eBIEDX0gixJ-O/edit?usp=sharing

2. December 2019 through 2020, also online here:

<https://docs.google.com/spreadsheets/d/13ctsH20jq-GWBDvvcqNTEPvx3OmF7LzdnogOWVnOvw/edit?usp=sharing>

We considered doing some statistical analysis to show what percentage of the time which river stretches show less than 126 cfu/100 mL *E. coli*, or less than 410, or greater than 1,000. However, we think a more important aspect of all this water quality data is that we have a pretty good up-to-date idea of when river stretches are clean and when they are not. For example, from mid-May through mid-June, 2021, the Withlacoochee River was clean at all measured locations, except for one or two blips which appear to have been localized contamination. We publish at least weekly examinations of such results: <https://wwals.net/issues/testing/#results> We share those results on social media, so people can know, especially before weekend outings. We also keep up to date a dozen or so Little and Withlacoochee River "beaches" on Swim Guide, an international smart phone app which displays red for bad water quality and green for good. <https://www.theswimguide.org/search/?q=withlacoochee>

As I have previously mentioned, significant contamination is most frequently from cattle manure, most frequently coming from Brooks County, from cattle near Okapilco Creek, not on the Withlacoochee River. About that, please see:

- "Current situation of Water Quality Testing, Suwannee River Basin 2020-08-02," which is attached and also online here: <https://wwals.net/?p=53260>

Online updates include:

- [WWALS Summary of FDEP chemical and biological tracers, Withlacoochee and Suwannee Rivers 2020-08-05](#)
- [Year in review: water quality testing, February 2020-2021](#)
- [Cattle and hogs: Withlacoochee River water quality status 2021-06-27](#)

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.

<https://wwals.net/?p=50614> The DNR grant also enabled WWALS to pay the Georgia Department of Transportation (GDOT) to make WLRWT road signs to go in Cook and Colquitt Counties. Lowndes County Public Works has already made and planted WLRWT road signs at three locations on the Withlacoochee River, and plans road signs for the rest of the dozen WLRWT locations in that county. Years ago WWALS already paid GDOT to make and plant road signs for all ARWT Georgia landings.

Lowndes County, Valdosta, and other public and private organizations are planning a Troupville River Camp at the Little River Confluence.

<https://wwals.net/maps/withlacoochee-river-water-trail/wrwt-map/wrwt-points/#trouville-river-camp>

They are also planning a Troupville River Park to add 77 acres of now-private land to the existing 44-acre Valdosta-Lowndes County Parks and Recreation Authority (VLPRA) park at the GA-DNR Troupville Boat Ramp, off of GA 133 at I-75 exit 18, on the site of historic Troupville, the former Lowndes County seat.

<https://wwals.net/maps/withlacoochee-river-water-trail/wrwt-map/wrwt-points/#trouville-river-park>

The main impediment to these River Camp and River Park plans has been lack of funds to purchase the privately-owned land. There is good reason to believe those funds are now in hand, given that the Mayor of Valdosta said so on his radio talk show Monday a week ago. Such a land purchase can be used as much of the match for a grant proposal to the Georgia Outdoor Stewardship Program, and such a grant could pay for the bulk of the River Camp and River Park.

For a previous GOSP proposal, WWALS collected support letters for Troupville River Camp from the City of Valdosta and Lowndes County, as well as the local Chamber, and Tourism Authority, a prominent architect and an engineering firm (both of whom invested significant time in preliminary work), two geology professors at Valdosta State University, and the local Disc Golf Association, as well as the private landowner, Helen Tapp. We even got letters from Florida: Madison and Hamilton County and the Suwannee River Water Management District. All those organizations thus support recreation on the Little and Withlacoochee Rivers near Valdosta. <https://www.wwals.net/pictures/2019-10-31--wwals-gosp-trouville-river-camp/>

Meanwhile, back in 2018 began the One Valdosta-Lowndes initiative:

<https://onevaldostalowndes.com/about-the-project/>

...to guide community and economic development for the next 15 years through an overall vision for the “end in mind”. The ultimate goal is to create a Valdosta-Lowndes Community and Economic Development Strategy.

The Mayor also mentioned on that same radio show that the stakeholders in One Valdosta-Lowndes recently met and decided on priorities. Top of their list, number one, by unanimous consent, is Troupville River Camp. The stakeholders, according to the One Valdosta-Lowndes web page is:

Partners in the strategy’s development include City of Valdosta, Lowndes County, Georgia Power, the Valdosta-Lowndes County Development Authority, Valdosta State University, the Valdosta-Lowndes Chamber of Commerce and South Georgia Medical Center.

So all those public and private organizations support Recreational use of the Withlacoochee and Little Rivers near the Little River Confluence.

Related to that, VLPRA is finishing an update to its Master Plan. VLPRA’s consultant on that

project invited WWALS to write up a WWALS Vision for Lowndes County Waterways, which is attached and online here: <https://wwals.net/?p=54946> The various participants in the VLPRA process agreed to incorporate all of that WWALS vision into the VLPRA Master Plan. The largest items in that WWALS Vision are the Troupville River Park and River Camp. Thus Valdosta, Lowndes County, VLPRA, and other participants such as the Chamber, endorse Recreational use of the Withlacoochee and Little Rivers near Valdosta. You won't find swimming or diving mentioned much, because it is simply assumed that where there is boating in our rivers, there will be swimming and diving.

Speaking of Georgia Power, as One Valdosta-Lowndes did, Georgia Power's Southwest Region has for the second year provided a substantial grant to WWALS for water quality testing, which we use on the Withlacoochee, Little, and Alapaha Rivers. Here is the WWALS press release, showing the Southwest Director's wife and child recreating in the Alapaha River at Naylor Park Beach: <https://wwals.net/?p=55918>

Naylor Park Beach is in the park that was built to include Naylor Boat Ramp, which was paid for by a Special Local Option Sales Tax (SPLOST), approved by the voters of Lowndes County, and paid by everyone who shops in Lowndes County, which includes people from a hundred miles around.

You will probably get a letter from the Mayor of Valdosta about recreational investments in our rivers, including possibly the largest of all: the \$100 million Valdosta has spent so far in upgrading its sanitary sewer system, including for example recently building a catch basin at the entrance to its Withlacoochee Wastewater Treatment Plant. Lowndes County has contributed funds to these upgrades, in addition to substantial investments in the county's own sewer system. Many of those Valdosta sewer system improvements were also funded by SPLOST, which means they were approved by the voters, who thus also support recreational uses of these rivers.

Thank you for your consideration,

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

Attachments:

- WWALS-Recreation-Data-for-GA-EPD.xlsx
- 2019-2020-WWALS-composite-spreadsheet-of-GA-FL-water-quality-Little-Withlacoochee-Alapaha-and-Suwannee-Rivers.xlsx
- 2021-06-30--WWALS-composite-spreadsheet-of-GA-FL-water-quality-Little-Withlacoochee-Alapaha-and-Suwannee-Rivers.xlsx
- 2020-08-02--WWALS-Water-Quality-Situation.pdf
- trouville-river-camp-summary.pdf
- 2021-03-01--WWALS-to-VLPRA-Master-Plan.pdf