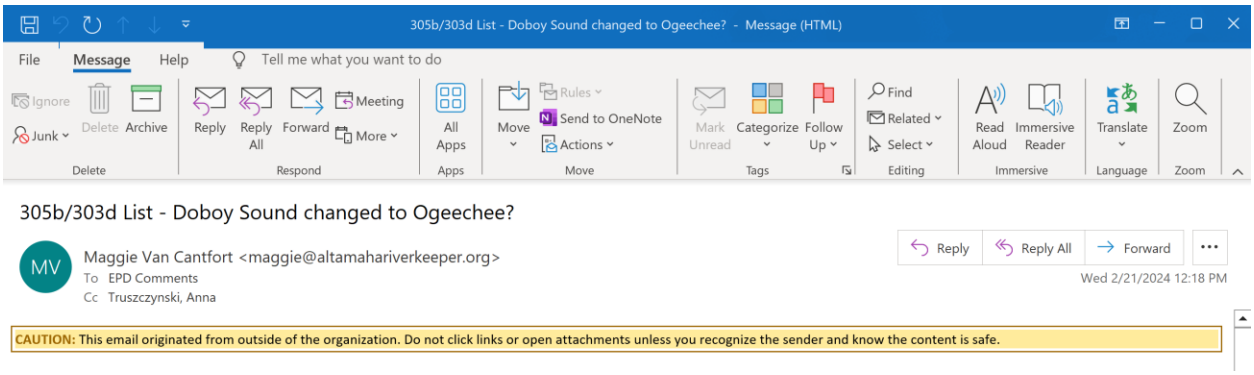


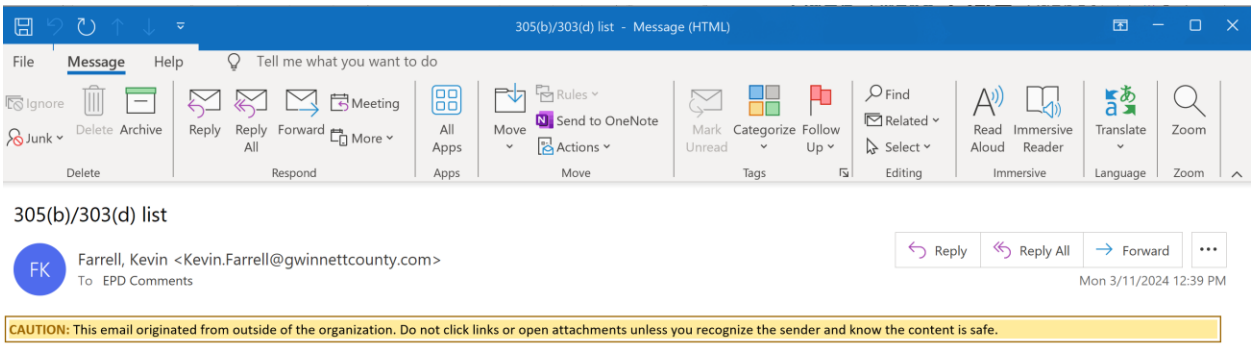
Hello,

Please provide the rationale for "The River Basin for GAR030602040623 – Doboy Sound was corrected from the Altamaha River Basin to the Ogeechee River Basin." The Altamaha River feeds Doboy Sound; I cannot understand why it would be changed to Ogeechee.

I noted this change in the "Highlights of the Draft 2024 305(b)/303(d) List of Waters" p. 7. I have not combed through all of the draft documents, yet; apologies if there is explanation provided in another document that I have not seen.

Thank you,

--
Maggie Van Cantfort
Altamaha Riverkeeper
Coast to Confluence Watershed Specialist
912-223-6073
altamahariverkeeper.org
facebook.com/AltamahaRiverkeeper



Good afternoon Susan,
I hope this finds you doing well.
Just a minor comment…..on the Lanier dam pool listing…perhaps add Gwinnett (18) as a data source.
Thanks

Kevin Farrell | Permitting and Regulatory Services Section Manager
Department of Water Resources | Gwinnett County Government
678.376.7179 | 684 Winder Highway, Lawrenceville, GA 30045
www.gwinnettcounty.com | kevin.farrell@gwinnettcounty.com
Learn more about Gwinnett County Water Resources at www.gwinnettH2O.com

LISTING OF WATERBODIES PURSUENT T0
SECTION 303(d) OF THE CLEAN WATER ACT
State of Georgia Draft 2024 305(b)/303(d) List
Public Notice February 7, 2024)
Public Written Comments
March 13, 2024

Submitted by: Augusta Engineering Department, Augusta, Georgia

---

GA EPD Reference Document: Draft 2024 Integrated 305(b)/303(d) List- Streams

1) Reference: Page 256 - Segment of Butler Creek in Richmond County listed as:
" Butler Creek, Phinizy Ditch to Savannah River, Augusta "Not Supporting" and "Bacteria" as a Cause/Source"

Comment #1

Listed segment should have been delisted based on relevant data that was available to Georgia Environmental Protection Division and bacteria historic data available for the listed segment. See details below.

Supporting information: *The listed reach qualifies for delisting per EPD 2018 document "Nine-Element Watershed Management Plan for the Augusta Canal, Butler Creek, Beaverdam Ditch Watershed in Savannah River". It is stated in this document that "Based upon these data, a course of action will be taken to remove the fecal coliform impairment from this lower section of Butler Creek relative to the 500 cfu/100 cfu water quality standard" [see attached Exhibit A-Part 1]. In addition, data collected by Augusta, GA from March 2020 through December 2023 support listed impaired segment meeting applicable water quality standards and qualifies for delisting from 303d listing of impaired segments. [see attached Exhibit A-Part2]*

---

2) Reference: Page 276 - Segment of Spirit Creek in Richmond County listed as:
" Spirit Creek, McDade Pond to Savannah River "Not Supporting" and "E Coli" as a Cause/Source"

Comment #2

The listed segment is lower seven-mile segment of Spirit Creek based on single sample value. In our professional opinion based on historic relevant data, seasonal geo-ecosystem variability, and local knowledge of area land uses, a better fit listing for this segment should have been in Category 3 (assessment pending). Segment is listed for bacteria impairment identified as due to nonpoint source & urban runoff. This reach is not in urban area.

Supporting information: *Spirit Creek impaired segment listing is based on Tier 2 data collected by GA EPD in 2018. Only four samples were collected; one each in March, August, October, and November. Out of four collected samples only one sample, collected in August, exceeded single sample threshold value and was used to place a 7mile reach of Spirit Creek on impaired waters list. In our professional opinion,*

this reach should have been placed in ***Category 3 (assessment pending). Factors such as geo-ecosystem seasonality variability of the data with regards to the parameter being assessed and results of other data including historical data at the site should have been considered. The area is not urbanized and human factor is limited in vicinity of GA EPD sampling location. There is high probably other factors contributed to August 29, 2018 collected sample. Same segment was listed previously and Augusta, Georgia collected sufficient geometric mean data to delist this segment in 2006 through 2010. Historical data summary included as EXHIBIT B (page 5/5).***

EXHIBIT A-PART1 (Butler Creek Data)

Nine-Element Watershed Management for the Augusta Canal (HUC-12 #030601060(Butler Creek (HUC-12 #030601060(and Beaverdam Ditch (HUC-12 #030601060(Watersheds in Savannah River Basin

Augusta-Richmond County
Columbia County

The preparation of this document was financed in part throu
from the U.S. Environmental Protection Agency under the Pr
Section 319(h) of the Federal Water Pollution Control Act, as

July 2018

Environmental Protection Division of the Department of Natural R
State of Georgia

Daily Load (TMDL) Development for Fecal Coliform in the Butler Creek Watershed, and the 2000 Total Maximum Daily Load (TMDL) Development for Fecal Coliform in the Rocky Creek Watershed identify multiple potential nonpoint fecal coliform sources, the most relevant being wildlife, leaking sanitary sewers, leaking septic tanks, and impervious surface runoff.

To go above and beyond the activities to reduce sediment transport, this Plan proposes to integrate fecal coliform monitoring of in-stream BMP activities proposed for the sediment TMDL. For in-stream BMPs, improving aquatic habitat will increase the abundance of macroinvertebrates and fish. It is expected that increased aquatic insect and fish populations will result in decrease concentrations of fecal coliform bacteria through increased predation pressure, which is currently lacking. This Plan proposes to monitor and calculate the load reductions of fecal coliform concentrations as a result of installed BMPs during the LID/GI proof of concept project described in section 2.1.1. Preferred BMPs will be installed at locations within the watershed that have impairments.

3.1.2.4. **Lower Butler Creek**

There are no significant sources of urban point or nonpoint source runoff in this sub-watershed. Stormwater from Lock and Dam Road and the adjacent airport is infiltrated into swales. ***Based upon these data, a course of action will be taken to remove the fecal coliform impairment from this lower section of Butler Creek relative to the 500 cfu/100 cfu water quality standard.***

3.1.2.5. **Rocky Creek**

While leaky sewer systems are not considered a non-point source of fecal coliform in streams, high concentrations for the listed section of Rocky Creek are associated with known and reported sewer overflow events (data not shown). In 2018, Augusta Utilities Department will install a force main and pump stations within the listed section of Rocky Creek. It is likely that this will significantly decrease the total load of fecal coliform to this section of creek. ***This Plan proposes to monitor the pre- and post-force-main installation for fecal coliform concentrations to quantify progress toward the 80% reduction goal. Samples will be collected at existing MS4 and non-MS4 sites at the current quarterly frequency and will be collected so that geometric means can be calculated for each sample event.***

3.2. Columbia County

3.2.1. County-wide NPS stormwater controls through ordinances and regulations (addresses fecal coliform impairments)

Columbia County has ordinances and technical manuals that provide legal authority to regulate stormwater management and reduce pollutants. Key ordinances are listed below:

i) Chapter 34, Article I, Grading; (ii) Chapter 34, Article II, Nuisances; (iii) Chapter 34, Article III, Soil Erosion, Sedimentation and Pollution Control; (iv) Chapter 34, Article IV, Stormwater Management; (v) Columbia County Supplement to the Georgia Stormwater Management Manual; (vi) Chapter 42, Floods; (vii) Chapter 90, Article III, Buffers and Screening; (viii)

EXHIBIT A-PART2 (BUTLER CREEK DATA)

Butler Creek fecal coliform cfu/100 ml geometric means by month		
Month Year	**Butler Creek at D. Barnard Parkway Bridge**	**Butler Creek at Phinizy Nature Park Bridge**
March 2012	106	79
June 2012	125	87
September 2012	21	52
December 2012	140	26
March 2013	33	14
June 2013	247	162
September 2013	82	30
December 2013	41	53
March 2014	51	22
June 2014	103	66
September 2014	201	98
December 2014	78	61
March 2015	32	26
June 2015	75	87
September 2015	129	168
December 2015	272	251
March 2016	41	56
June 2017	166	152
September 2017	116	158
December 2017	149	92
Source: Augusta Engineering Department		

EXHIBIT A-PART2 (BUTLER CREEK DATA)

Sample Date	Weather Event Type	Recreational Standard	SNSA		DB Pkwy	
12/1/22	Wet	1,000	290		260	
12/13/22	Dry	1,000	73		55	
12/20/22	Wet	1,000	36		55	
12/22/22	Wet	1,000	102		184	
Dec. 2022 Geometric Means			94		110	
3/7/23	Dry	1,000	115		147	
3/14/23	Wet	1,000	105		65	
3/21/23	Dry	1,000	45		85	
3/28/23	Wet	1,000	600		>700	
March 2023 Geometric Means			134		93	
6/6/23	Dry	500	56		90	
6/13/23	Wet	500	220		167	
6/20/23	Wet	500	80		244	
6/28/23	Dry	500	227		187	
June 2023 Geometric Means			122		162	
9/7/23	Dry	500	233		173	
9/12/23	Wet	500	460		480	
9/19/23	Wet	500	300		240	
9/26/23	Wet	500	80		92	
Sept. 2023 Geometric Means			225		207	
12/5/23	Wet	265	196		115	E. Coli
12/7/23	Dry	265	172		199	E. Coli
12/12/23	Wet	265	261		191	E. Coli
12/14/23	Dry	265	96		66	
Dec. 2023 Geometric Means			170		130	E. Coli

EXHIBIT B (SPIRIT CREEK DAYA)

Summary of Historical Coliform Data

All concentrations in Cfu/100 ml

Sample	Recreational	Sample Location		
Date	**Standard**	**Up**	**Mid**	**Down**
9/25/06	200	117	50	160
10/24/06	200	110	63	130
11/21/06	1,000	51	14	28
12/12/06	1,000	31	8	46
1/22/07	1,000	139	11	124
2/6/07	1,000	42	7	67
3/26/07	1,000	42	25	83
4/23/07	1,000	64	11	63
5/21/07	200	40	11	70
6/27/07	200	177	30	270
7/30/07	200	60	23	120
8/20/07	200	105	43	270
9/11/07	200	88	17	104
10/29/07	200	46	8	120
11/19/07	1,000	170	8	150
12/17/07	1,000	170	320	360
1/23/08	1,000	48	24	33
2/20/08	1,000	40	10	70
3/27/08	1,000	52	12	68
4/29/08	1,000	400	64	275
5/27/08	200	< 9	9	9
6/24/08	200	180	140	80

Geometric Means Data (Spirit @ Mike Padgett (Ga Hwy 56)

Nov 2010	1000	166
Feb 2011	1000	38
May 2011	200	98
Aug 2011	200	188

GA EPD Monthly Data (Spirit @ Mike Padgett (Ga Hwy 56) used for listing impaired segment

3/18/2018	1000	130
8/29/2018	200	800
10/18/2018	1000	120
11/28/2018	200	170

PO Box 16206
Savannah, GA 31416
Phone/Fax: 866-942-6222

www.ogeecheeriverkeeper.org
Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

March 14, 2024

Via E-Mail

Georgia Environmental Protection Division
Watershed Protection Branch, Watershed Planning and Monitoring Program
2 Martin Luther King, Dr., Atlanta, GA 30334
Suite 1407A, Tower 2
Attn: Susan Salter

Re: Draft Georgia 2024 305(b)/303(d) List Documents

Dear Ms. Salter:

Ogeechee Riverkeeper's (ORK) mission is to protect, preserve, and improve the water quality of the Ogeechee River basin, including the Canoochee River and the coastal and tidal rivers of Liberty, Bryan, and Chatham Counties. ORK works with local communities to share and collect information on the ecological and cultural importance of rivers and streams throughout the Basin, and use that information to amplify the voices of those who speak for the watershed. Central to ORK's is to ensure that water quality rules and standards that apply in our basin are fully supportive, carefully assessed, properly protective, and, where needed, successfully restored to support all beneficial uses of the waters.

ORK offers these comments on the 2024 draft 305(b)/303(d) List Package proposed by the Georgia Environmental Protection Division (EPD). Our comments focus on the EPD's approach to assessing rivers and streams where "natural water quality" is a consideration factor. In particular, EPD must explain how it has made its 'naturally low' determinations for specific water body segments. Additionally, EPD should apply the current water quality standards to all water body segments and not withhold listing for promised future rulemakings that have not yet occurred for all listing decisions.

Waters Determined to Have Naturally Low DO and pH - Explanation and Justification Needed

More information is needed to justify how EPD determined the specific water body segments listed were determined to have naturally low dissolved oxygen (DO) and pH. The information provided in the List Package does not sufficiently explain the scientific basis for how these determinations were made and how the EPD is assured that these water body segments are supporting their designated beneficial uses. ORK asks for more concrete, scientifically-based justifications for the determinations made here and in future "natural water quality" determinations.

While the "Summary of Listing Decisions for the 2024 305(b)/303(d) List of Waters" document does discuss "natural water quality," the explanations there are not ground in science and do not justify how EPD is assured that the designated beneficial uses are being met. In the 'Assessment of Waters Based on "Natural Water Quality"' section, EPD explains why certain waters are being assessed differently, but does little to explain its justifications. Here, EPD explains that for pH, water body segments that have "been identified as a blackwater stream" that do not have any "point source or land use issues that may be contributing to the low pH measured in the steam" are not listed as impaired. However, no citations to scientific research, EPD reports, or other justification are made to show how EPD is assured that these "natural" low pH levels are supporting the beneficial uses.

Further, even less information is provided for the dissolved oxygen (DO) determination. In the 'Assessment of Waters Based on "Natural Water Quality"' section, EPD simply states that when "it was determined that that cause [of low DO] was likely due to natural conditions versus a human caused condition," the water body segment was not listed as not supporting their designated beneficial uses. However, no explanation of that determinations are explicitly provided in the List Package's documents. The only explanations provided are quick citations to other documents in the "Draft 2024 Integrated 305(b)/303(d) List - Streams" document, some of which are over 20 years old,[1] with no further general explanation.

ORK asks that EPD clearly explain how it is reassured that these water body segments' "natural water quality" are supporting their designated beneficial uses. These explanations should be rooted in sound science, show that the most vulnerable uses are still protected, and at what degree the beneficial uses are no longer sufficiently protected.

<u>Assessment Methodologies D.1.a.3 (DO) and D.1.b.2 (pH) for Making Use Support Decisions - Remove</u>

Under Georgia's currently applicable water quality standards, the listing methodologies for dissolved oxygen (DO) and pH do not properly determine the status of water body segments. In the context of the "natural water quality" segments, sufficient data and information exists to determine whether the applicable numeric water quality standards are being achieved. Until the Georgia Department of Natural Resources proposes and promulgates new rules, the water quality standards are applicable and should be applied. As such, the "natural" dissolved oxygen and pH listing methodologies should not be included, and those water body segments should be listed as not supporting its designated beneficial use. ORK calls on EPD to provide the full picture of water quality status of all waters throughout Georgia under the state's current water quality laws.

EPD should not place these "natural water quality" segments in Category 3. In its 2024 List Package, EPD included a number of water body segments in the Category 3 "Assessment Pending" category. In the "Summary of Listing Decisions for the 2024 305(b)/303(d) List of Waters" document, EPD explains that this category is meant for situations "when there is insufficient data or information to make an assessment on whether the water is meeting its designated use(s)." However, data is not the issue - monitoring data for both DO and pH are known for the water body segments added to this category related to "natural water quality."

---

[1] *See, e.g.,* GAR031102010103 for Greasy Branch (Suwanee Basin), citing "TMDL completed DO 2001" ; GAR030702020402 for Boggy Creek (Satilla Basin), citing "TMDLs completed DO (2001)..." ; GAR030702040602 for Boone Creek (St. Marys Basin), citing "TMDL completed DO 2001."

Further, for DO, EPD states that "water quality data indicated that the DO criteria were not being met…," clearing showing sufficient data existing. Where water quality criteria exist, as they do for DO and pH, those measures indicate whether the beneficial uses are being supported. Water quality criteria are set to ensure that the most vulnerable beneficial uses are protected. Therefore, when a water body segment does not meet water quality criteria requirements, it is not supporting its beneficial use. And because sufficient data and information exists to make that assessment, these particular segments should not be placed in Category 3.

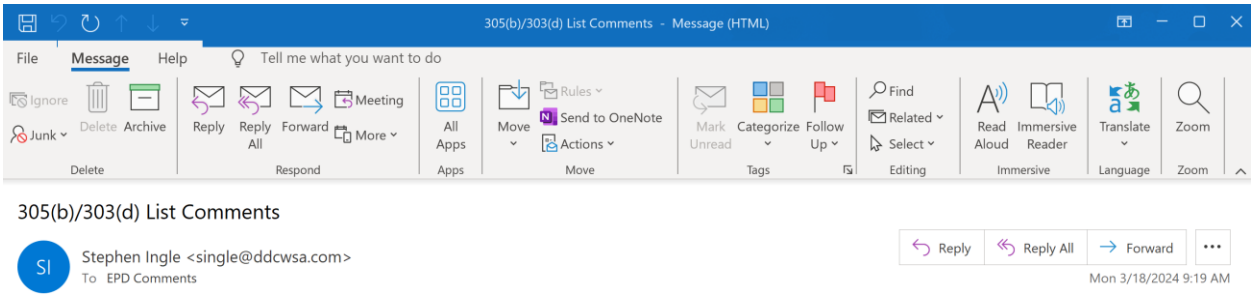
In the "Georgia's 2024 305(b)/303(d) Listing Assessment Methodology" document, the listing methodologies refer to GAC 391-3-6-.03(7) in justifying the placement of these "natural water quality" segments into Category 3. While this provision does state that certain waters "may have a quality that will not be within the general or specific requirements" (emphasis added)" the actual "natural conditions" have yet to be defined. GAC 391-3-6-.03(3)(i) defines "natural conditions" as "the collection of conditions for a particular waterbody used to develop numeric criteria for water quality standards," and directs the EPD and/or the Director to develop these conditions through "an examination of historic data, comparisons to reference watersheds, application of mathematical models, or any other procedure deemed appropriate." This has yet to occur, as noted in Listing Methodology D.1.a.3.[2]

The result is that water body segments that are not supporting their designated beneficial use are being left off of the Integrated 305(b)/303(d) list. This means that these lists are not truly reflective of the water quality status of the state. Georgia's currently EPA-approved water quality standards are what should be reported to the EPA in this integrated report. Because sufficient data and information exist to determine whether beneficial uses are being met under current water quality laws, EPD should remove Listing Methodologies D.1.a.3 and D.1.b.2 from its Assessment Methodoly and then list the Category 3 water body segments awaiting "natural water quality" criteria as "not supporting" their designated beneficial uses.

Thank you in advance for your time and consideration. If you have any questions regarding this letter, please contact ben@ogeecheeriverkeeper.org.

Ben Kirsch, Legal Director
Ogeechee Riverkeeper

[2] "If a waterbody does not meet the DO criteria more than 10% of the time and the waterbody is located in an area of the State where it is anticipated the low dissolved oxygen condition is natural, then EPD will place the waterbody in Category 3 until work is completed that establishes the "natural" dissolved oxygen concentration for the waterbody." (emphasis added). Georgia's 2024 305(b)/303(d) Listing Assessment Methodology. At page 13.



Here are the comments from the Douglasville-Douglas County Water and Sewer Authority on the Draft 2024 305(b)/303(d) list of impaired streams.

The following are comments from the Douglasville-Douglas County Water and Sewer Authority regarding the Draft 2024 Integrated 305(b)/303(d) List. Our comments are limited to Douglas County streams.

1. There has been a segment of Anneewakee Creek that has been listed as impaired for Bio F for some time, described as being from House Creek to Lake Monroe. We have been unclear for a while where exactly House Creek was located. However, in researching the draft list, we discovered that the recently-published final TMDL report for the Chattahoochee River Basin included stream location maps. According to those maps, "House Creek" is a stream that we refer to as "Arbor Branch." The description of the impaired segment has been changed on the draft list to "Tributary 200 ft downstream Creekwood Drive to Lake Monroe." This description appears to be based on the USGS map, which shows both streams crossing Creekwood Drive before they converge. However, our local GIS mapping shows that the streams actually converge before the combined stream crosses under Creekwood Drive (i.e., there is only one culvert under the road in this location). The confluence appears to be about 200' upstream of the road. Therefore, we recommend that you change the word "downstream" to "upstream" in the segment's description on the list.

2. It is interesting that you have removed the name "House Creek" from the segment description mentioned above, because the stream with that name is still listed as a supporting segment on the list

(GAR031300020334). Since USGS does not have a name for the stream, you may consider calling it "Arbor Branch (f/k/a House Creek)."

3. A new impaired stream segment was added to the list on Little Anneewakee Creek from I-20 to Shawnee Lake. The impairment is for ammonia toxicity and algae. One of the "source" codes given for this impairment is "M," which is defined in the legend as a Municipal Point Source Discharge. We assume this means from a municipal wastewater treatment facility. The listed stream segment is completely within our jurisdiction, and we have no municipal wastewater treatment facilities on or upstream of this segment. There is, however, a private wastewater treatment system at the Arbor Village mobile home park, located at 4085 Midway Road, Douglasville GA 30134, not far upstream from the segment. Is it possible that the EPD believes this facility is the source of the impairment? Since this facility has its own permit with the EPD, we request that the source code be changed for this impairment. We do not want the citizens of Douglas County to incorrectly believe that this impairment is due to a failure at one of our facilities.

4. Gothards Creek is a newly-listed segment under Category 3 (assessment pending), described as "Headwaters to Sweetwater Creek." It is on the list as being only in Douglas County. In fact, Gothards Creek begins in Douglas County, enters Paulding County briefly, reenters Douglas County, reenters Paulding County and then Douglas County a second time, before entering Cobb County and converging with Sweetwater Creek in that county.

Steve Ingle, P.E.
Project Engineer

Douglasville-Douglas County Water and Sewer Authority
8763 Hospital Drive
Douglasville, GA 30134
(678) 631-1539
Mailing Address:
Post Office Box 1157
Douglasville GA 30133

www.ddcwsa.com