

W. Darryl Muse DIRECTOR OF UTILITIES

March 5, 2020

Mr. James A. Capp, Branch Chief Watershed Compliance Program, Municipal Compliance Unit GA Environmental Protection Division, Watershed Protection Branch 2 MLK, Jr. Drive S.E., Suite 1152 East Atlanta, Georgia 30334

> RE: Proposed Consent Order City of Valdosta Withlacoochee Water Pollution Control Plant (WPCP) and Mud Creek WPCP NPDES Permits No. GA0033235 & GA0020222

Dear Mr. Capp:

Thank you for allowing the City of Valdosta to meet with you and your staff to review the conditions outlined in the proposed consent order. Over the years, the Division and the City have developed a relationship that embraces continuing infrastructure improvement as well as sustainable new technology to reduce environmental impacts. To that end, the City concurs with many requirements outlined in the proposed consent order. The City is Valdosta is requesting consideration of the following options;

The City requests a Project In-Lieu of Penalty (PIP). To gain a better understanding of community effects on waters of the state, the City proposes to collect additional water quality data for a 4 years. The collection points are Okapilco Creek, Knights Ferry, Nankin Boat Ramp and the Withlacoochee at the Florida/Georgia line. These tests will be conducted no less than 3 days each week. Water quality will be tested for Fecal Coliform and E-Coli. Also, a DNA sample will be collected monthly at the same locations. The City believes this data will help fill in the blanks and become invaluable in identifying as well as managing source and non-point source effects on State waters. The estimated cost for this project is \$225,000.

The City requests to enter into an education and marketing campaign to address eco-tourism as well as place educational placards near public access points along State waters. The estimated costs is \$35,000.