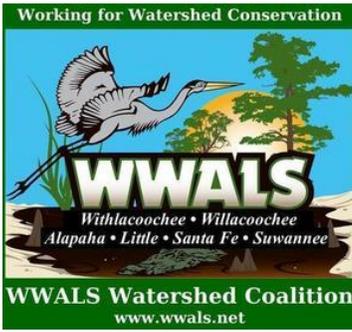
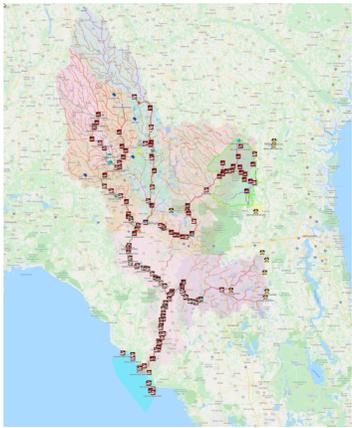


September 13, 2021



To: Richard Hardy
Deputy City Manager
Director of Public Works
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1017 Myrtle St, Valdosta, GA 31601

Re: **Opportunity to address trash at the source through education and enforcement**



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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.



Richard,

Thanks for sending us to Stormwater and Engineering to discuss the trash situation. WWALS Executive Director Gretchen Quarterman and Intern Bobby McKenzie and I learned much when we met on September 1, 2021, with City Engineer Pat Collins and Stormwater Director Angela Bray, some of which I will outline in this letter. At their suggestion, we have also talked to Code Enforcement. And both Code Enforcement and Stormwater tell us the next step is through Public Works.

Up front let me say we thoroughly agree with the City Engineer that it is much better to stop the trash at the source. Merely cleaning it up downstream could be seen as enabling the upstream sources. Despite much recent good progress by the City, trash has already built up again at the Sugar Creek logjam below Twomile Branch. See the picture taken Wednesday, September 8, by Bobby McKenzie, of hundreds of bottles, cans, and styrofoam cups. That repeated trashjam demonstrates that upstream sources are still a problem. Fortunately, the City of Valdosta has all the tools it needs at its disposal, in its Code of Ordinances.



Right now there is a great opportunity for public education to get voluntary cooperation by property owners. Valdosta, Lowndes County, and WWALS have another large-scale cleanup scheduled for Saturday, October 9, 2021. We are disappointed that the cleanup as announced by the City does not include the Sugar Creek logjam, and does not seem to address the upstream trash problem. Like the similar cleanup last year, there will be press releases and news stories. How can we best use that opportunity?

Good progress

The City's ongoing hotspot cleanups are having an effect, both in cleaning up trash and in getting the public involved.

At the meeting on September 1, we learned that the city is effectively using retention ponds as trash traps. I think the numbers were 455 private subdivision retention ponds and 23 owned by the City, with the private ones inspected by the City every five years and the public ones inspected about 10 a year. Among these retention ponds is the one behind the Candlewood Motel that Bobby reported through Click'n'Fix. We were glad to hear Valdosta appears on top of that location.

At that meeting we learned that when Stormwater closes out a Click'n'Fix ticket, that is not

the end of the story. For example, the owner of the parking lot on St. Augustine Road just north of Hightower Creek that Bobby reported through Click'n'Fix got two letters from the City to Valdosta Mall Corners % Stafford Development Company.

Engineering sent a letter signed by Willie Jones, Stormwater Tech, on August 20, 2021 (attached). It gave directions about the stormwater pond and its pipes, but was somewhat vague about location of trash: "All trash and waste materials must be removed and properly disposed of."

The Code Enforcement letter signed by Brandon Corbitt on July 16, 2021 (attached), directed picking up trash in certain locations, but not the mounds down by Hightower Creek: "The cardboard around the dumpsters behind Kirklin's, the trash behind and around Enterprise, and all trash along the back fence needs to be picked up and put in proper container." The pictures accompanying that letter also did not include the mounds by the creek. That letter included a code passage about trash cans, but did not say the property owner must install more trash cans. Code Enforcement says Public Works has to do that. We do not understand why that is, since the Code as quoted in the letter already says how many trash cans for how many parking spaces. City Marshall James Dean told me that when Brandon Corbitt went back to check, he found some trash cans there. Indeed, there are a few up near the buildings. But there are none out in the parking lot, where people park, eat, and discard trash. How best can the City enforce the trash can requirements of the Code? Which department should do that: Public Works or Code Enforcement?



Thus Stormwater and Code Enforcement made some progress with at least one large trash source, although there is more that can be done.

More that can be done

Bobby McKenzie took that further, by showing the property owner's contractor videos he took of the trash at the creek. That got a truckload of more trash removed. The property owner may even have implemented a more permanent solution; we are waiting on further responses from the property owner before saying more about that. We can say now that the property owner wants to be part of the solution. This gives us hope that public education could get more property owners to voluntarily come up to Code.

The Valdosta Police Department on February 12, 2018, issued a press release (attached): "*Therefore, effective immediately, the Valdosta Police Department will aggressively start stopping and citing motorists and pedestrians when we see litter. **Citations will be issued.***" It was covered the same day [by the Valdosta Daily Times](#). Parking lots are a much bigger source of trash, so perhaps it is time for zero tolerance for those, too.

Trash Traps

Trash traps still will be needed, because there still will be individual litterers who are not caught, and parking lots not yet addressed. As you know, WWALS has a grant application in progress, with Valdosta to be listed as a collaborator. As you also know, there are less expensive models available than the one Valdosta implemented above Lake Sheri a decade ago. The Valdosta Stormwater Manager and Engineering Services Director have already met with the owner of one of the companies that makes such affordable trash traps, and provides replacements if they break and people to clean them out as part of the service.



At the September 1st meeting, Engineering and Stormwater expressed concerns about funding for ongoing maintenance for trash traps. Fortunately, Valdosta City Council Tim Carroll, when he called me about another matter, said he could think of at least two ways to find ongoing funds.

As you probably know, Valdosta and Lowndes County have told the landowner at the Little River Confluence that they have the funds to purchase her land, with the intent to use it for a nature preserve park with a Troupville River Camp on it to promote eco-tourism. That is downstream on the Withlacoochee River from Sugar Creek. Trash rafts floating by will not help eco-tourism.

While Lowndes County has greatly improved the boat ramps with its weekly trash pickups by its new litter team, the property at the Confluence still gets covered in litter from Sugar Creek whenever the Withlacoochee is high. The sooner this problem is solved, the better for local recreation and eco-tourism.

A chronic problem

This trashjam problem and its upstream sources have been known to the City since at least 2010 when the Stormwater Master Plan (SWMP) was written. See this picture from that 2010 Plan of that same Sugar Creek trashjam. That Plan said the trash is a public health issue: *“Streams are a natural attractor for children and play structures occur along the stream edge. The pollution in this stream poses a serious risk of disease and injury and children should be strongly discouraged from playing in the stream until the trash and sewage are eliminated.”*



The SWMP directed production of an Enforcement Response Plan (ERP), the most recent version of which is from [November 2015](#). That ERP seems like a very useful document, with specific directions for the Utilities and Engineering Departments. However, curiously it does not mention Code Enforcement. It also says nothing about trash cans. Meanwhile, [City Ordinances Sec. 82-1\(d\)](#) says: *“Any city police officer, marshal, firefighter, employee of the parks and recreation department of the city, code inspector, or building code inspector is empowered to enforce the provisions of this section by issuing a citation and bring the accused before the judge of the municipal court for the city.”*

Maybe that is the underlying source of delay in addressing this decade-old trash problem: it seems to be scattered across several departments. We hope you can help with that.

We know it can be done. The one business owner with trash cans distributed in its parking lots is: Walmart. We have now heard from two City sources that this is because trash from the Walmart on Norman Drive was drifting across the road onto another property, and the City required something be done.

We have written up this situation at more length in the accompanying white paper, which includes extensive references to relevant parts of City Ordinances. Meanwhile, this letter hits the high points.

Summary

As the 2010 Master Stormwater Plan says: *“The leaking manholes and sewer pipes should be repaired immediately and protected from future damage. The garbage should be removed from the creek and an education and enforcement program to prevent further pollution should be implemented.”*

Yet a decade later, and despite some good progress the City has made, the problem continues. At the rate trash is collecting at the Sugar Creek trashjam, our volunteers, although they are tired, may have to go clean it up again even before October 9th. Would you and some City staff be available Sunday, September 19, to help?

We are looking to you as Public Works Director or Assistant City Manager to lead us all to more effective solutions to this trash problem. The October 9th cleanup and publicity before it is a great opportunity to announce those solutions and to use them for public education, if altered to include at least the Sugar Creek logjam.

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

Attachments:

- Valdosta Police Department press release of February 12, 2018
- Code Enforcement letter of July 16, 2021
- Stormwater letter of August 20, 2021