

April 15, 2019

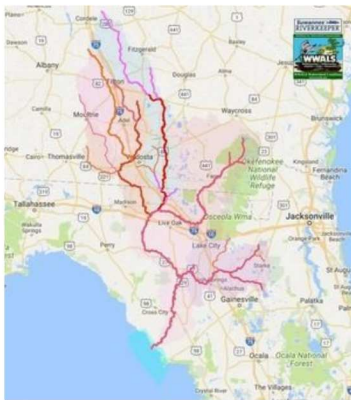
U.S. Environmental Protection Agency
EPA Docket Center
Office of Water Docket
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460



**Re: Docket ID No. EPA-HQ-OW-2018-0149,
Revised Definition of Waters of United States**



To Whom it May Concern:



WWALS Watershed Coalition, Inc. (WWALS), also known as Suwannee Riverkeeper, submits the following comments on the United States Environmental Protection Agency (“EPA”) and Department of Defense, Department of the Army, Corps of Engineers (“Corps”) proposed rule entitled “Revised Definition of Waters of United States,” 84 Federal Register 4154-01 (February 14, 2019) (hereinafter “Proposed Rule”).

In addition to supporting the comments of Waterkeeper Alliance and the Southern Environmental Law Center (SELC), WWALS adds these comments on groundwater.

The Proposed Rule’s categorical exclusion of groundwater makes no sense here above the Floridan Aquifer where surface water and groundwater constantly interchange, and pollutants travelling through groundwater are a frequent source of health, environmental, and economic problems.

This proposed exclusion of groundwater is called out repeatedly in the Proposed Rule, starting with this:

Section II. Background A. Executive Summary, fourth paragraph:

The proposal would exclude from the definition of “waters of the United States” waters or water features not mentioned above. The proposed definition specifically clarifies that “waters of the United States” do not include features that flow only in response to precipitation; groundwater, including groundwater drained through subsurface drainage systems;

Just because a feature only flows in response to precipitation is no reason to believe it cannot carry pollution. Features such as extended floodplains can carry pollution into groundwater. Much of the fragile, fractured, limestone rock containing the Floridan Aquifer is a natural subsurface drainage system, refilling that Aquifer, which is the main water source for drinking, industry, and agriculture in south Georgia and most of Florida.

This is not just some theoretical matter. Withlacoochee River water going into Shadrick Sink west of the river, then under the river and miles east, forced the city of Valdosta to sink its water wells twice as deep, as documented by the USGS in 1999. See Appendix A.

PO Box 88, Hahira, GA 31632
850-290-2350
wwalswatershed@gmail.com
www.wwals.net

WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.

