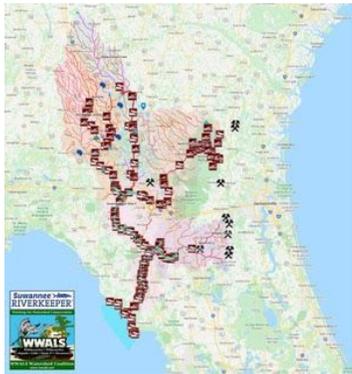


November 10, 2020

To: Noah Valenstein  
Secretary, FDEP  
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Hugh Thomas  
Executive Director, SRWMD  
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Sen. Keith Perry  
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Cc: Scott R. Koons  
E.D., Rivers Task Force  
[koons@ncfrpc.org](mailto:koons@ncfrpc.org)



Re: land acquisitions, event invitations, water withdrawals, and water quality testing

Dear Secretary Valenstein, Director Thomas, and Sen. Perry,

This morning I spoke via gotowebinar in the SRWMD Board Meeting. This letter expands on what I said. I offered compliments, a suggestion, and a recommendation on the FDEP press release of yesterday:

“Senator Keith Perry, DEP Secretary Noah Valenstein and Environmental Leaders Tour Critical Land Conservation Projects in the Suwannee Valley”

<https://content.govdelivery.com/accounts/FLDEP/bulletins/2a9c7ca>

Compliments on acquiring land for watershed protection. Last month [I thanked SRWMD for acquiring the Drufter Tract](#) on the Withlacoochee River near the GA-FL line. More thanks for these other acquisitions and their management.

However, I was confused by “Environmental Leaders.” I looked in the picture for Merrillee Malwitz-Jipson, Jim Tatum, or Mike Roth, but could not find them. I thought maybe I took the picture, but I don’t remember being there, either.

The suggestion: when holding such tours, could SRWMD and FDEP invite people from Our Santa Fe River (OSFR), especially for lands along the Santa Fe River? And could you please invite Suwannee Riverkeeper? I’m sure you can think of other environmental organizations who are very interested in watershed protection of springs, creeks, and rivers.

Also compliments on the many good words by Alan Kay of ACT, Hugh Thomas of SRWMD, and Sen. Perry. In the interests of brevity I will just quote a bit from Sec. Valenstein:

*“Our springs are a litmus test for Florida’s water quality; they are the barometer of the effectiveness of our land management activities. What happens on the land can affect our groundwater, creating a ripple effect that impacts every component of our environment.”*

That is certainly true for land protection. It is even more true for water withdrawals.

As we have for years, at least since before the adoption of the North Florida Regional Water Supply Plan, we continue to recommend SRWMD and FDEP should adopt a water budget and start denying some water withdrawal permits, in order to replenish river and spring levels and flows. <https://wwals.net/?p=27688>

A good place to start would be by denying the water withdrawal permit application by Seven Springs and Nestlé at Ginnie Springs on the Santa Fe River. We also continue to ask SRWMD to revisit Nestlé’s permit for water withdrawal at Madison Blue Spring on the Withlacoochee River. We don’t need more profits by a Swiss company to produce more plastic bottles that we have to clean up from our springs and rivers, which continue to flow less and lower because of such withdrawals.

In addition to all that, back on November 4, 2019, we heard from FDEP at the Triennial Review Workshop in Tallahassee, that FDEP has funds for water quality monitoring and is allocating them to geographical areas. <https://wwals.net/?p=50596> It is time to allocate such funds to the Suwannee River Basin to help track contamination episodes such as we have seen recently.

For example, the April 24, 2020, 87,000 gallon raw sewage spill by Quitman, Georgia, quite likely traveled all the way down the Withlacoochee and Suwannee Rivers to the Gulf of Mexico.

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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.*



<https://wwals.net/?p=53765> We know it was bad as far down as FL 6, because Valdosta and WWALS are testing on the Withlacoochee River upstream, and Madison Health is testing from the state line to FL 6. But we have no test data downstream from that time period, even though we do have a report of visibly contaminated water at Running Springs a few days after the Quitman spill.

We speculate that the Quitman sewage may have reached the Gulf, because the Quitman episode is similar to another contamination episode a month earlier, which SRWMD estimated would reach the Gulf in a similar timeframe. <https://wwals.net/?p=51780> That March 2020 episode was apparently caused by cattle manure runoff.

In general, FDEP and SRWMD stopped testing downstream of FL 6 a few months after the record Valdosta sewage spill of December 2019. This lack of testing means many contamination episodes may go undetected, especially as they reach different stretches of the rivers. FDEP appears to test reactively after a spill, but this April Quitman spill did not appear in the GA-EPD Sewage Spills Report until days after it occurred, by which time the contamination was probably already well down the Suwannee River.

<https://wwals.net/issues/vww/ga-spills/>

The March 2020 contamination episode that SRWMD estimated would reach the Gulf had no sewage spill report, because it apparently originated with non-point-source cattle manure runoff. We knew about both episodes shortly after they happened, because of testing by Valdosta, WWALS, and Madison Health.

In the March episode, SRWMD tested at three Suwannee River locations downstream from the Withlacoochee River Confluence. For the April Quitman spill, we can only speculate what happened downstream of FL 6.

Reactive testing is sometimes useful, but regular, closely-spaced, frequent testing is much more useful, as Valdosta and Madison Health have demonstrated. If we had that on the Suwannee River, everyone would have a much better idea how far the Quitman sewage actually went.

WWALS tries to warn swimmers, boaters, and fishers about river contamination episodes, both by posting reports on social media, and through the internationally-used smartphone app Swim Guide.

<https://www.theswimguide.org/search/?q=withlacoochee> For any of that to be useful, we need current and ongoing data.

If the City of Valdosta can test for fecal bacteria three times a week over forty river miles all the way to the GA-FL line, and if the small-population County of Madison can test three locations twice a week, the great state of Florida can test thrice-weekly from the state line to the Gulf of Mexico.

For more on the subject of testing, please see “Current Situation of Water Quality Testing, Suwannee River Basin 2020-08-02,” <https://wwals.net/?p=53260>

See also “WWALS Summary of FDEP chemical and biological tracers, Withlacoochee and Suwannee Rivers 2020-08-05,” <https://wwals.net/?p=53340> We thank FDEP for the chemical tracers and DNA markers, which were instrumental in indicating that much of the recent contamination has been from cattle, which in turn has been instrumental in getting cooperation from some of the cattle owners. We ask FDEP to do more such testing.

I believe all dozen Florida counties of the Middle and Lower Suwannee River and Withlacoochee River Task Force have made similar requests for testing, to their legislative delegations and to FDEP. I have copied the Task Force’s Executive Director, Scott R. Koons, who can answer questions on their request far better than I.

For the rivers and the aquifer,

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