



March 11, 2026

VIA EMAIL

Susan Salter
Environmental Protection Division
Watershed Planning and Monitoring Program
2 Martin Luther King, Jr. Drive SW
Suite 1470A, East Tower
Atlanta, GA 30334
Email: EPDComments@dnr.ga.gov

RE: Public Comments on the Georgia 2026 305b/303d draft list of waters

Dear Ms. Salter:

Please accept these comments from Chattahoochee Riverkeeper (CRK) regarding Georgia Environmental Protection Division's (EPD) draft 2026 305(b)/303(d) list of assessed and impaired waterways.

CRK is a non-profit environmental advocacy organization dedicated to the protection and stewardship of the Chattahoochee River, its tributaries and watershed. CRK represents approximately 10,000 members who use and enjoy the river system and depend on the Chattahoochee River and its lakes as a source of drinking water and economic prosperity. On behalf of our members, we submit these comments on the draft 2026 305b/303d list.

CRK supports the addition of West Point Lake on the 303(d) list for chlorophyll-a.

In the proposed 2026 305(b)/303(d) list, the Chattahoochee River Arm of WPL was moved from Category 3 (Assessment Pending) to Category 5 (Not Supporting) for chlorophyll-a. The other location with water quality standards for chlorophyll-a (Dam Pool) remains at Category 3. CRK supports the listing decision.

In 2014, Chattahoochee Riverkeeper (CRK) began monitoring chlorophyll-a levels on West Point Lake. CRK staff collect monthly samples at three stations on West Point Lake between April and October in accordance with a Sampling and Quality Assurance Plan (SQAP) approved by EPD. At the end of the season, data collected by CRK is averaged with data collected by EPD.

Seasonal Average chlorophyll-a has gradually increased each successive year, but algae levels made a significant jump in 2023 and 2024. For example, at the LaGrange water intake station on West Point Lake, chlorophyll-a levels increased from 19 ug/L in 2022 to over 28 ug/L in 2023. The standard set by EPD for that station is 24 ug/L.

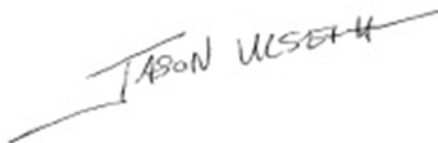
Because of its location on the Chattahoochee River downstream of Metro Atlanta, West Point Lake is vulnerable to pollutants from many sources, including muddy sediment from development, fertilizers from lawns, leaking sewer pipes, and septic systems in disrepair. CRK worked throughout the late 1990s and early 2000s to make the City of Atlanta overhaul its failing sewer system. After Atlanta and other Metro Atlanta utilities made improvements to their sewer systems, water quality downstream improved significantly. For example, West Point Lake water quality data collected by EPD in 1986 had a seasonal chlorophyll-a average of 44 ug/L.

We encourage EPD to develop the Total Maximum Daily Load (TMDL) Implementation Plan for West Point Lake as soon as possible.

To protect water quality in West Point Lake, EPD must initiate the process to develop a TMDL Implementation Plan for West Point Lake as soon as possible. CRK formally requests to be included as a stakeholder.

Thank you for your attention to these comments. If you have any questions, please contact Jessica Sterling, Technical Programs Director, at jsterling@chattahoochee.org or 404-352-9828.

Sincerely,

A handwritten signature in black ink that reads "Jason Ulseth". The signature is written in a cursive style and is positioned above the printed name.

Jason Ulseth

Executive Director and Riverkeeper

Keeping watch over our waters since 1994.

Gainesville | Atlanta | LaGrange | Columbus

www.chattahoochee.org