

As the Waccamaw Riverkeeper, I appreciate the opportunity to comment on South Carolina's Triennial Review of water quality standards. This review is one of the most important tools we have to ensure that our rivers, wetlands, and communities are protected according to the best available science, as required under Section 303(c) of the Clean Water Act.

To safeguard the Waccamaw watershed, South Carolina's water quality standards must be updated in a way that reflects the best available science, not simply the minimum federal requirements. While EPA criteria provide a national baseline, they do not always offer the level of protection needed for sensitive waters — especially in light of recent federal rollbacks. South Carolina has both the authority and the responsibility under the Clean Water Act to adopt more protective state standards when federal criteria fall short. This is essential to ensuring that designated uses — including recreation, shellfishing, drinking water supply, and aquatic life — remain fully protected.

I urge the Department to prioritize the following:

- Adopt only those EPA numeric and narrative criteria that strengthen protections, and maintain or enhance existing state standards where federal updates are weaker or outdated.
- Establish stronger, state-specific protections for emerging contaminants, including PFAS, which continue to threaten drinking water sources across South Carolina and are not yet fully addressed by federal criteria.
- Improve clarity and consistency within Regulations 61-68 and 61-69, ensuring that definitions, classifications, and implementation procedures support transparent and enforceable water quality protections.
- Protect sensitive and high-value waters, including blackwater systems like the Waccamaw River, which require standards tailored to their unique chemistry and vulnerability to nutrient pollution, dissolved oxygen fluctuations, and climate-driven stressors.
- Ensure robust and equitable public participation, particularly for communities that rely directly on surface waters for drinking, fishing, cultural practices, and economic livelihoods.

South Carolina's Triennial Review is an opportunity not just to update regulations, but to demonstrate leadership in protecting the state's waters. Strong, science-based standards are essential to safeguarding the Waccamaw River and the communities and ecosystems that depend on it.

Thank you for your consideration and for your ongoing work to safeguard South Carolina's water resources.

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