

SUGGESTED COMMENTS – VIRGINIA WATER QUALITY CERTIFICATIONS FOR THE ACP AND MVP

AUGUST 1, 2017 WILD VIRGINIA

The DEQ is accepting written comments from July 3 through Aug. 22.

- Comments for ACP should be submitted to:
comment-acp@deq.virginia.gov – See ACP [Public Notice](#)
- Comments for MVP should be submitted to
comment-mvp@deq.virginia.gov – See MVP [Public Notice](#).

Sample Comments:

-The public participation process is deficient and must be re-started or expanded. The current schedule deprives the public of the chance to play its rightful role.

-DEQ must analyze potential cumulative impacts on state waters from all pollution sources to waters that would be affected by these projects. Such cumulative impacts analyses are conducted by DEQ for all other individual reviews of regulated polluting activities.

-DEQ has illegally refused to even consider that the evidence may require it to deny certification for either proposed project. The burden of proof to assure that all water quality standards will be met is on the applicants and DEQ.

-DEQ may not allow vital detailed information to be submitted by the pipeline companies after the certification process has been completed.

-DEQ must forbid or limit variances to water quality protection requirements in the certifications, not allow open-ended authority for agencies or companies to grant variances after certifications are issued.

-DEQ has not analyzed impacts to recreational and aesthetic uses that would result from construction or maintenance of the pipelines.

-The activities proposed will impair or deny existing or designated uses that must be fully protected in affected state waters.

-DEQ has failed to analyze whether antidegradation requirements to maintain high water quality in streams can be met in any of its analyses.

-DEQ refuses to consider the results of reviews of erosion and sediment control plans, and other detailed plans, such as characterizations of karst areas, after the public comment period ends.

Read More:

[Legal Bases for Section 401 Reviews](#)