

CAROLYN W. DULL  
MAYOR

DIRECT DIAL 540.332.3810  
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116 W. BEVERLEY STREET  
P.O. BOX 58  
STAUNTON, VA 24402

August 22, 2017

**VIA EMAIL IN PDF AND EXPRESS DELIVERY**

The Honorable Robert Dunn  
Chair, State Water Control Board  
P.O. Box 1105  
Richmond, Virginia 23218

Mr. David K. Paylor  
Director  
Department of Environmental Quality  
P.O. Box 1105  
Richmond, Virginia 23218

Re: Atlantic Coast Pipeline Project

Dear Chair Dunn and Mr. Paylor:

On behalf of the City of Staunton, I submit this letter as a set of summary comments regarding the proposed Section 401 Water Quality Certifications for Atlantic Coast Pipeline construction-related activities that may affect water along the proposed route that implicate the serious interests of our City. We have compelling interests, as we have expressed before both to the Virginia Department of Environmental Quality (DEQ) and to the Federal Energy Regulatory Commission (FERC). To our astonishment, we have received no reply and nowhere in any of the environmental statements issued by federal or state agencies or representatives have we seen any effort to address our objections and abiding concerns. Why not?

For ease of reference, I enclose a copy of my February 21, 2017 letter to Ms. Wellman of the DEQ and a copy of the July 5, 2017 letter from Mr. Sliwoski, our Director of Public Works, to Mr. Franson, working on behalf of Atlantic Coast Pipeline, to express further the threat that is posed to our citizens' and Augusta County citizens' water supply that is represented by our Gardner Spring, including its large, critical recharge area that is the

The Honorable Robert Dunn  
Mr. David Paylor  
August 22, 2017  
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life source of Gardner Spring. In Mr. Sliwoski's letter, although from all indications neither FERC nor DEQ has been willing to address, much less study the Gardner Spring water resource, he points out that a new study is underway and should be ready "in the near future" by Emery & Garrett Groundwater, Inc., to better and further define the complete Gardner Spring recharge area. Still, no one from DEQ or FERC has committed yet to any willingness to pause and consider those results. What is the rush, Chairman Dunn and Mr. Paylor? With such study results, informed and specific conditions can be formulated to help protect the recharge area.

The DEQ and the State Water Control Board, both procedurally and substantively, have an opportunity to be on the right side of history and to honor your environmental mission to bring true integrity and accountability to the 401 Certification Review, choosing not to rush and certainly not to cede and abdicate what are state separate and independent responsibilities—owed to Virginia and its citizens—to the Army Corps of Engineers or anyone else. Will you?

On behalf of the City of Staunton, I echo the strongly-merited and well-expressed position of our region's General Assembly members in their August 7, 2017 letter, a copy of which is enclosed. I join Delegate Bell, Delegate Rasoul, Senator Deeds, and Senator Hanger in also asking that the timetable be extended for meaningful public comment and, at the very least, the State Water Control Board ultimately require individual Section 401 certification review for wetland and stream crossings rather than glibly and improperly purport to rely on the Army Corps of Engineers. The potential threat to our Gardner Spring starkly illustrates the need for such meaningful individual review, which FERC seems to have utterly ignored in its Environmental Impact Statement although we brought the matter to the attention of FERC in February. As our area's General Assembly members emphatically assert, an individual analysis is incredibly important. Our Staunton and Augusta and other citizens count on you to discharge your non-delegable duty to protect our water supplies, our streams and our rivers—and our own Gardner Spring. How can you, in good faith, do so absent an individual review by our own state professionals and officials?

Please: we implore you and the other members of the State Water Control Board to stand strong in protecting our Commonwealth's precious water resources—such as our own Gardner Spring. Will you?

Lastly, unlike what we've experienced so far with the seemingly telling lack of response to our other communications, may we—please—hear from you?

Sincerely,



Carolyn W. Dull  
Mayor

The Honorable Robert Dunn

Mr. David Paylor

August 22, 2017

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Enclosures

cc: The Honorable Heather Wood  
The Honorable Lou Ann Jessee-Wallace  
The Honorable Timothy G. Hayes  
The Honorable Roberta A. Kellam  
The Honorable G. Nissa Dean  
The Honorable Robert H. Wayland, III  
The Honorable Rebecca R. Rubin  
The Honorable Emmett W. Hanger, Jr.  
The Honorable R. Creigh Deeds  
The Honorable Richard P. "Dickie" Bell  
The Honorable Sam Rasoul  
The Honorable Members of the Staunton City Council  
The Honorable Members of the Augusta County Board of Supervisors  
The Honorable Members of the Board of Directors of the Augusta County Service  
Authority

CAROLYN W. DULL  
MAYOR

DIRECT DIAL 540.332.3810  
FACSIMILE 540.851.4001



116 W. BEVERLEY STREET  
P.O. BOX 58  
STAUNTON, VA 24402

February 21, 2017

**VIA EMAIL IN PDF AND EXPRESS DELIVERY**

Ms. Julia Wellman  
Environmental Impact Review Coordinator  
Department of Environmental Quality  
629 E. Main Street  
Richmond, VA 23219

Re: Atlantic Coast Pipeline Project  
DEQ #16-248F  
Docket Nos. CP15-554-000, CP15-554-001, and CP15-555-000  
FERC/EIS-0274D

Dear Ms. Wellman:

As the Mayor of the City of Staunton, located in the beautiful Shenandoah Valley of Virginia where we treasure our natural resources, I write to affirm the Staunton City Council's objection overall to the Atlantic Coast Pipeline project and lodge a specific objection based upon the threat to a critical water source for our citizens and for Augusta County. We submit that both Dominion and the Federal Energy Regulatory Commission, as evidenced in the Draft Environmental Impact Statement (DEIS), have utterly failed to account yet for the potentially catastrophic consequences of the project as to the route of the line that would be unacceptably within the ambit of our water source known as Gardner Spring. We believe the huge gas pipeline would cut through the recharge area that is an integral aspect of the Gardner Spring resource that serves both our City and our neighbors in the County, putting all those who rely upon the water in jeopardy.

Please understand that I do not intend this letter to be exhaustive or even comprehensive and certainly not a formal brief in support of the City's position. I simply highlight aspects that even without a highly sophisticated submission beg for immediate pause and fundamental reconsideration of the DEIS and certainly against any approval. Actually, we ask that the Virginia Department of Environmental Quality (VDEQ) demonstrate the

exercise of independent judgment, even against what may be political pressures on your agency otherwise, and we request the DEQ itself lodge with the Federal Energy Regulatory Commission strong objection to the project at least as it relates to our water supply. Will you?

Our citizens are fortunate that our predecessor leaders of our City had the foresight to secure for them a vitally important water source referred to as Gardner Spring, which actually is located in neighboring Augusta County. Gardner Spring benefits residents both of our City and of Augusta County. The City initially acquired the rights to Gardner Spring in the 1930s. The precious water from Gardner Spring is processed at our City's water plant and then redistributed through pipelines in our City and into Augusta County to those who depend on it, including individuals and those in important Shenandoah Valley commerce. Our City has invested millions in not only our water plant but also more recently in new water lines that help to serve Augusta County users as well. Gardner Spring provides a majority of the water for our City residents, being capable of offering as much as or more than 5 million gallons of raw water per day for treatment by the City of Staunton, again both for the ultimate benefit of the City and of Augusta County.

The Gardner Spring resource is incontrovertibly priceless and any chance of it being put in jeopardy by the Atlantic Coast Pipeline project is actually putting the safety and the welfare of the City of Staunton and Augusta County and their users at risk. From what we can discern (and we are not engineers), nothing in Dominion's submission and nothing in the DEIS begins to address this critical resource in any meaningful way even though the DEIS acknowledges generally in section 4.1.2.3 potential underground damage because of Karst geology that prevails in our region. As the DEIS states, "Karst terrain is characterized by the presence of sinkholes, caverns, an irregular 'pinnacled' bedrock surface, and springs." Despite seemingly glibly admitting that "[t]hese features could present a hazard to the pipeline both pre- and post-construction due to cave or sinkhole collapse, and can also provide direct conduits from the ground surface to the groundwater, increasing the potential for groundwater contamination," nowhere is it obvious that Dominion has been required to have done and submitted to you or the Federal Energy Regulatory Commission an independent, detailed study and analysis of the potentially momentous adverse consequences for Gardner Spring, a major and critical water supply. It is not obvious to us that anything in the "Construction Impacts and Mitigation" aspects of the DEIS addresses Gardner Spring or, without specific reference by name, even anything similar to this uniquely vital water resource for so many who depend on it daily. If the DEIS includes such a discussion, would you or the Federal Energy Regulatory Commission point it out for us and our citizens in order that we may assess it?

We would anticipate that Dominion may attempt to assert that its proposed, huge pipeline does not go directly into the center of Gardner Spring; however, that contention would be illusory at best, because the proposed route is sufficiently near Gardner Spring that the recharge area of Gardner Spring is implicated and quite possibly directly jeopardized.

That recharge area is vital, because the bulk of the water that feeds Gardner Spring comes from an extensive underground aquifer system and network of karst channels that the DEIS has wholly failed to acknowledge, much less analyze. Gardner Spring's underground paths provide a fairly constant flow, allowing the spring to discharge a steady, reliable resource of critical water. The water, drawing from a large recharge area, is fed by precipitation, which enters the ground, and the water is discharged from Gardner Spring approximately 28 to 45 days later. The recharge contribution area for Gardner Spring may extend as many as five or more miles from Gardner Spring. **Where is that explicitly mentioned at all in the DEIS?**

Based on what we know about a spring water source generally and our own Gardner Spring, we believe that it is essential that any meaningful analysis of the environmental impact must be based on a careful, thorough consideration of the recharge area. Spring recharge areas are, without doubt, recognized to be as vital to the quality of groundwater resources as the center of the spring itself, perhaps more so in ways that are particularly pivotal in this instance. The water quality, without a spring recharge area "can be adversely affected by land uses that allow groundwater contamination to migrate into underlying aquifers." *Emery & Gardner Groundwater, Inc., Hydrogeologic Investigation of Gardner Spring* (July 2002). Even distant spills can reach Gardner Spring through the Karst aquifer system. As such, the Gardner Spring recharge area is highly susceptible to a wide variety of potential contaminants, and the area should continue to be protected from land uses that even might threaten the quality of the water.

Let me mention another consideration that is revealing about Dominion and this project that Dominion is trying to impose, selfishly for profits, on us and others. Several months ago, a City representative invited Dominion to visit with us and sit down just with our City Council and discuss the project, being mindful of the potentially calamitous implications for Gardner Spring. We could not have really imagined that Dominion would not join us around the table in our Caucus Room. To our surprise and dismay, Dominion arrogantly refused even the courtesy of a meeting discussion, rebuffing our request and invitation. That speaks volumes to us and to our City citizens—and should speak volumes to VDEQ and to the Federal Energy Regulatory Commission.

VDEQ declares that its mission "is to protect and improve the environment for the well-being of all Virginians." You also promise that "DEQ collaborates . . . to enhance the quality of our environment and to strengthen the role everyone plays in environmental protection." Will you collaborate with us and our citizens to protect Gardner Spring?

We hope and trust you are listening, even though we realize that some of Virginia's elected officials appear quite a while ago to have been advocating for the Atlantic Coast Pipeline project even well before the issuance of the DEIS. Despite the political muscle visited by Dominion and the pressure, will both VDEQ and the Federal Energy Regulatory Commission truly act independently and protect our environment, including our Gardner Spring?

So that you will appreciate perhaps even more the sincerity and consistency of our objection and advocacy now, I also enclose a copy of our City Council's resolution adopted October 23, 2014. As you and the Federal Energy Regulatory Commission know, many others also have objected to or taken issue with the project, which will cut through some of the priceless natural resource treasures in our region and state. We also are keenly mindful, as you should be, that the water coming from Staunton and Augusta County is the headwaters of both the James and Shenandoah rivers and eventually flows into our state's capital as well as into our nation's capital. Our City, beyond the reasons stated by many others for objection, objects strongly because its critical water resource now apparently is directly and indirectly implicated by the proposed route reflected in the DEIS.

We ask you to honor that promise and refuse to permit this pipeline project to proceed, advocating similarly with the Federal Energy Regulatory Commission. At the very least, we urge DEQ and the Federal Energy Regulatory Commission to insist that Dominion have independent outside professional engineers and other professionals, undertake and complete and publish for comment a detailed study regarding the potential implications for our Gardner Spring water source. Both VDEQ and the Federal Energy Regulatory Commission should mandate that Dominion complete and submit its study for public exposure and comment before the process proceeds further. **Will you or the Federal Energy Regulatory Commission insist that Dominion do so?**

We thank you for your time and consideration. We look forward to your and the Federal Energy Regulatory Commission's response in the near future. Please provide us with specific responses to our questions and, to use VDEQ's own words, honor the commitment to "protect and improve the environment for the well-being of all Virginians." **Will you, please do so—through action, not just words, forcing Dominion to respect your mission and the critical interests of Staunton and Augusta County citizens?**

Sincerely,



Carolyn W. Dull  
Mayor

cc: Federal Energy Regulatory Commission  
Members of the Staunton City Council  
Members of the Augusta County Board of Supervisors  
Members of the Board of Directors of the Augusta County Service Authority

Enclosure

Atlantic Coast Pipeline Project  
DEQ #16-248F  
Docket Nos. CP15-554-000, CP15-554-001, and CP15-555-000  
FERC/EIS-0274D

**RESOLUTION OF THE  
COUNCIL OF THE CITY OF STAUNTON, VIRGINIA  
IN OPPOSITION TO ATLANTIC COAST PIPELINE**

WHEREAS, Dominion Virginia Power has entered into what the company describes as a joint venture with three other major U.S. energy companies—Duke Energy, Piedmont Natural Gas and AGL Resources—to build and own a natural gas pipeline which will traverse portions of three states, including 11 counties and two cities in the Commonwealth of Virginia; and

WHEREAS, the proposed project will pass in close proximity to a public water source and boundary of the City; and

WHEREAS, representatives of Dominion Virginia Power, upon the invitation of City Council of the City of Staunton, Virginia, made a presentation about the project to Council at its meeting on August 28, 2014, held at Robert E. Lee High School to accommodate an overflow audience; and

WHEREAS, reflective of the considerable public interest in the project, dozens of individuals at the meeting, through questions submitted to City Council and comments made during the public comment period, registered their strong opposition to the project, as proposed; and

WHEREAS, members of City Council share many of the concerns expressed by citizens of the City and desire, as a body, to express their opposition to the project.

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Staunton, Virginia, that:

1. Council joins with other localities in the Commonwealth of Virginia, including the counties of Augusta and Nelson, in their expressions of concern about and opposition to the Atlantic Coast Pipeline.

2. Council opposes the construction of the Atlantic Coast Pipeline and urges Dominion Virginia Power and all others involved to reduce reliance on natural gas and to seek solutions for the 21<sup>st</sup> century, including conservation and renewable energy such as solar and wind power, that will satisfy future energy needs without imperiling the natural bounty and beauty of our region and the health and safety of our citizens.

3. In the event Dominion Virginia Power and its partners submit an application for construction of the Atlantic Coast Pipeline to the Federal Energy Regulatory Commission (“FERC”), Council, in the strongest possible terms, urges FERC to withhold approval of the project, on the basis that the natural gas to be transported is not believed to be required to serve the energy needs of Virginia or North Carolina (a significant portion of which can be satisfied by conservation and renewable energy

sources) and, therefore, the pipeline will neither serve the public interest nor satisfy the legal standard of “public convenience and necessity.”

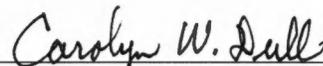
4. Council respectfully requests that the Governor of Virginia reconsider his public endorsement of the Atlantic Coast Pipeline, and, after consultation with the City of Staunton and other localities that would be impacted by the project and consideration of risks to the environment (including threats to karst environments and water supplies locally in the Shenandoah Valley, elsewhere in the Commonwealth of Virginia and in the District of Columbia and the State of Maryland) and the state’s economy (including its agricultural and tourism sectors), oppose the project.

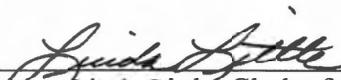
5. Council respectfully requests that Senator Mark Warner, Senator Tim Kaine and Congressman Bob Goodlatte join publicly in opposition to the project, communicate their opposition to FERC and take appropriate action to encourage FERC to withhold approval of the project.

6. In the event Dominion Virginia Power and its partners elect to proceed with the construction of the Atlantic Coast Pipeline, and the project is approved by FERC, Council implores Dominion Virginia Power and its partners to give full consideration to the use of existing utility and highway corridors for the project, so as to minimize, to the greatest extent possible, the impacts of construction, maintenance and operation of the project.

7. Council directs that the Clerk of Council send a copy of this resolution to Dominion Virginia Power, Senator Mark Warner, Senator Tim Kaine, Congressman Bob Goodlatte, Governor Terry McAuliffe and Cheryl A. LaFleur, Chairman of FERC.

Adopted this 23<sup>th</sup> day of October, 2014.

  
\_\_\_\_\_  
Carolyn W. Dull, Mayor

Attest:   
\_\_\_\_\_  
Linda Little, Clerk of Council

**THOMAS C. SLIWOSKI**  
Director of Public Works

**Birthplace of the  
Council-Manager  
Form of Government**



**116 W. BEVERLEY STREET**  
**P.O. Box 58**  
**STAUNTON, VA 24402**

**540.332.3892 (O)**  
**540.851.4004 (F)**

July 5, 2017

Mr. Rob Franson, P.E.  
Natural Gas Infrastructure Development Consultant  
Atlantic Coast Pipeline, LLC  
c/o Dominion Energy  
707 E. Main Street, 19<sup>th</sup> Floor  
Richmond, VA 23219

RE: Request for Letter of No Objection – Atlantic Coast Pipeline, LLC

Dear Mr. Franson:

This letter is in response to your June 7, 2017 letter requesting locations where the Atlantic Coast Pipeline (ACP) may cross City of Staunton facilities. Attached is a drawing showing the ACP in relationship to the City's Gardner Spring and critical water supply infrastructure. Gardner Spring is owned by the City of Staunton, and is a critical water supply source. We consider the recharge area as a facility that serves this spring and which is critical to its existence and productivity. While the ACP does not physically cross City facilities (pipes) per se, it does encroach on the recharge area of Gardner Spring.

As indicated on the drawing, the current ACP route passes through several key elements of the City's Gardner Spring water supply source. These elements include:

1. Bell Creek Watershed
2. Gardner Spring Recharge Area
3. Proposed Groundwater Protection Zone

These elements are further defined in a July 2002 report prepared for the City by Emery & Garrett Groundwater, Inc. titled *Hydrogeologic Investigation of Gardner Spring, City of Staunton, Virginia*. As described in the report, these elements are integral to the water recharge of Gardner Spring, one of two developed and active water supply sources for the City of Staunton and surrounding areas of Augusta County.

In a letter from Mayor Carolyn W. Dull to Ms. Julia Wellman, Environmental Impact Review Coordinator, Virginia Department of Environmental Quality, dated February 21, 2017, Mayor Dull wrote "to affirm the Staunton City Council's objection overall to the Atlantic Coast Pipeline project and lodge a specific objection based upon the threat to a critical water source for our citizens and for Augusta County." Specifically, the water source which Mayor Dull is referring to is Gardner Spring.

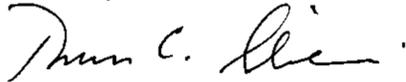
Mayor Dull further states that "the Gardner Spring resource is incontrovertibly priceless and any chance of it being put in jeopardy by the Atlantic Coast Pipeline project is actually putting the safety and the welfare of the City of Staunton and Augusta County and their users at risk." To-date, we are not aware of a response to Mayor Dull's letter.

In your letter, you also requested "guidelines typically associated with crossings" of our facilities. Placement of the ACP within the recharge area of Gardner Spring is anything but typical. While the ACP does not physically cross a City water supply pipe, its close proximity to our pipes (approximately 0.45 miles) presents its own challenges and considerations, particularly during construction, and its impact on the recharge area of Gardner Spring. Such considerations are atypical and are not specifically addressed in our design and construction standards.

Presently a new study by EGGI is underway to better and further define the complete Gardner Spring recharge area, including its extent toward the west. We anticipate receiving the results of that study in the near future and would be happy to share those results with you at that time.

I must reiterate Mayor Dull's previous position and lodge objection based upon the threat to a critical water source for the citizens of both Staunton and Augusta County.

Sincerely,

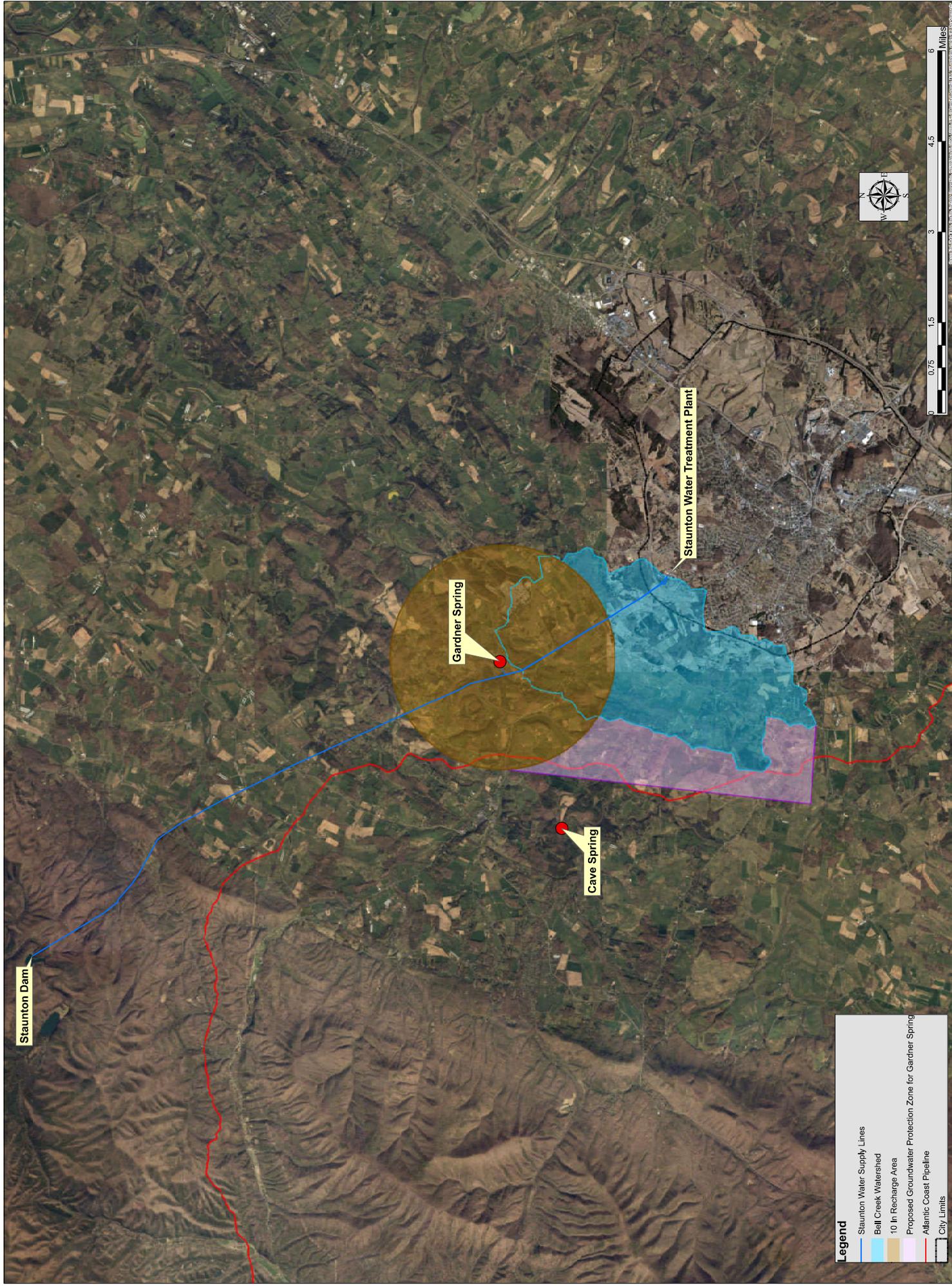
A handwritten signature in cursive script, appearing to read "Thomas C. Slivoski".

THOMAS C. SLIWOSKI  
Director of Public Works

ATCH

cc: City Manager

# Vicinity of the Atlantic Coast Pipeline to City of Staunton's Water Supply Facilities





COMMONWEALTH OF VIRGINIA  
**HOUSE OF DELEGATES**  
RICHMOND

**RICHARD P. "DICKIE" BELL**

POST OFFICE BOX 239  
STAUNTON, VIRGINIA 24402

COMMITTEE ASSIGNMENTS:  
EDUCATION  
GENERAL LAWS  
HEALTH, WELFARE AND INSTITUTIONS

August 7, 2017

*Via U.S. and electronic mail*

Governor Terry McAuliffe  
P.O. Box 1475  
Richmond, VA 23218

David K. Paylor, Director  
Virginia Department of Environmental Quality  
629 East Main St.  
Richmond, VA 23219  
Email: David.Paylor@deq.virginia.gov

Robert Dunn, Chair  
State Water Control Board  
c/o Office of Regulatory Affairs  
Department of Environmental Quality  
P.O. Box 1105  
Richmond, VA 23218  
Email: citizenboards@deq.virginia.gov

**Re: 401 certification for the proposed Mountain Valley and Atlantic Coast Pipelines**

Dear Governor McAuliffe, Director Paylor, and Members of the State Water Control Board:

We are writing on behalf of a caucus of western Virginia members of the General Assembly representing the headwaters of the Chesapeake Bay. Our districts are in the paths of the two proposed 42-inch high pressure natural gas transmission lines, the Mountain Valley Pipeline and the Atlantic Coast Pipeline.

We know that there are many views on this subject, however, we encourage careful consideration of the impacts of these proposed projects on our vibrant rural communities and our state's water supplies. Therefore, we write to urge the Commonwealth to use the full scope of its authority to assess the impacts of the Mountain Valley and Atlantic Coast pipelines with particular emphasis on all aspects of the impacts of these pipelines on our state's water supplies.

Our constituents are counting on the Department of Environmental Quality (DEQ) and the State Water Control Board (Water Board) to conduct a thorough and transparent review of stream and

wetland crossings, as well as all upland activities, and ensure that Virginia water quality standards are met.

Specifically, we request that DEQ require individual 401 certifications for wetland and stream crossings, rather than relying on the Army Corps of Engineers' (the Corps) Nationwide Permit 12 (NWP 12), as is currently proposed by DEQ. In addition, DEQ should decline to move forward with the scheduled public comment period or the Section 401 certification until the pipeline developers have provided all information necessary for thorough DEQ review.

Further, we respectfully request that the timetable for the public comment periods and hearings be pushed back to give you and the public time to properly review and comment meaningfully and transparently on all information relevant to the 401 certification, including impacts to each stream and each wetland crossing and for all erosion and sediment control and stormwater management plans.

As you know, Virginia has broad authority to conduct its own analysis under Section 401 of the Clean Water Act. These enormous infrastructure projects would cross hundreds of sensitive waterways, including streams and rivers in some of the steepest terrain in the eastern United States. Both pipelines pose some of the most significant threats to Virginia's water quality and aquatic environment in decades. The pipelines would also cross thousands of sensitive waterways, and pipeline construction on the very steep slopes that characterize our region will increase erosion and sedimentation, seriously threatening water quality. Our constituents rely on these waters for recreation, habitat, and the health of our watersheds. Analysis of these crossings by DEQ and the Board is critical to ensure that water quality and the aquatic environment in Virginia are protected.

Such a review would not be redundant with the analysis under NWP 12. The Corps will not conduct site-specific reviews of the more than 1,000 crossings along the pipelines' routes. When authorizing a project under NWP 12, the Corps must only find that each individual waterbody crossing along the pipeline route will not cause a loss of more than a half-acre of waters of the United States.

As DEQ has noted, NWP 12 contains general conditions, including those pertaining to restoration and mitigation. But the Corps will not ensure that those conditions are met before determining that a project can be authorized under NWP 12. That means impacts from activities like in-stream blasting and trenching in rugged and challenging terrain will not be considered unless DEQ considers them. Whether serious impacts such as sedimentation can be mitigated would not be known without such analysis, despite the risk to some of the most pristine waters in Virginia. DEQ can and indeed must fill this gap with its own review of waterbody crossings.

We appreciate DEQ's planned approach to review some of the impacts not covered by NWP 12. This analysis is incredibly important. However, the current limited scope of this review fails to consider river, stream, and wetland crossings.

Finally, the timeline proposed by the DEQ is not adequate for the needed review of these pipelines by the Commonwealth. Why the rush? Protection of Virginia's streams, rivers, and public and private water supplies is too important to place at risk. DEQ must take the time to ensure it has all necessary information, review that information, give the public an opportunity for thorough

review, and then conduct a comprehensive and transparent analysis of critical water crossings and all related upland activities. Such an approach will allow DEQ to fulfill its responsibilities to protect the waterways of Virginia on which my constituents rely.

Sincerely,



Richard P. "Dickie" Bell  
20<sup>th</sup> District, House of Delegates



Sam Rasoul  
11<sup>th</sup> District, House of Delegates



R. Creigh Deeds  
25<sup>th</sup> District, Senate of Virginia



Emmett W. Hanger, Jr.  
24<sup>th</sup> District, Senate of Virginia