

- My name is XXXXX. I am here today because [explain that you live near a water source you care about, or are a member of an organization, or your stake in this fight.] I urge you to vote against the draft clean water certification for the Mountain Valley Pipeline as submitted to you by DEQ because there is no reasonable assurance that it would comply with Virginia's water quality standards.
- While DEQ claims it has addressed and resolved all the issues that concern me, I do not believe it has.
- Virginia DEQ has not taken the time to thoroughly investigate all the risks from this pipeline, so neither the public nor the Board has the information or analysis needed to determine with "reasonable assurance" that this pipeline would not violate Virginia's water quality standards. There is no analysis to substantiate DEQ claims. Therefore, the Board should not approve this proposal.
- North Carolina offers an example of how to conduct a more appropriate and thorough analysis. In its review of the Atlantic Coast Pipeline, the state DEQ has not rushed and has asked the Atlantic Coast Pipeline for additional information four times due to inadequate submissions.
- There is no need to rush this process because there is no documented need for this pipeline. The Board can and should take the time needed to examine all of the threats to Virginia's water quality.
- DEQ has failed to analyze individual stream and wetland crossings as other states have done--despite there being approximately 400 Virginia water crossings involved in the Mountain Valley Pipeline. MVP would cross two groundwater wellhead protection areas and 20 surface water protection areas.
- The Board should not rely on reviews by the U.S. Army Corps of Engineers for waterbody crossing activities. The Corps permit is not intended to protect Virginia water quality standards. For example, the Corps allows so-called temporary impacts to aquatic environments that can persist for months or even years, and would eliminate some recreational uses. In contrast, Virginia water quality standards require that designated and existing uses be fully protected at all times.
- Virginia water quality standards are more stringent than the Corps permit. Under a Corps permit, Virginia water quality standards may be violated. The Board should require the individual Virginia water protection permit so that Virginia can apply and enforce the more protective Virginia water quality standards.
- This proposal should not be approved without complete and thorough analysis of stormwater management and sediment control. Despite these being two of the most significant water pollution risks, DEQ has deferred evaluation of them and is keeping

them “separate and apart” from its review for the Clean Water Act certification. Sediment is a significant cause of impaired water quality, increases water treatment costs for localities, and destroys habitat for aquatic plants and animals. Large-scale ground disturbing activities, like timber clear-cutting and pipeline construction, increase runoff pollution. Erosion rates from construction sites are greater than from almost any other land use.

- I am concerned about drinking water sources in the path of the pipeline. The City of Roanoke has estimated that increased sediment in the Roanoke River from the proposed Mountain Valley Pipeline would increase the city’s costs by at least \$36 million per year, and potentially much more. The City is concerned that sediment can contain industrial pollutants like PCBs and would severely impact their drinking water quality and treatment responsibilities, as well as a federally endangered species, the Roanoke logperch.
- ADD INFORMATION ON YOUR OWN COMMUNITY.
- The risks posed by MVP are real and significant. Interstate pipeline construction of the same exact type that would be used for Mountain Valley Pipeline, in less steep terrain, has already contaminated clean water in three nearby states. While DEQ staff has said that regulatory activity in other states is not relevant, it is absolutely relevant that construction techniques and mitigation measures that would be used by MVP have led to water contamination in other states. Plans on paper have not helped states stop water contamination before it occurs.
- In Pennsylvania, construction of the Mariner East 2 pipeline contaminated the drinking water source for 15 families earlier this year. In Ohio, construction of the Rover pipeline has violated the law 19 times this year. In West Virginia, Dominion alone was cited for 13 water pollution violations along three pipelines in three counties, impacting 17 different streams.
- Stating on paper that risks will be mitigated without having done thorough analysis of each water crossing does not provide any assurance that Virginia waters will be protected. The record shows that pipeline construction through steep ridges and valleys and karst formations has regularly led to violation of water quality standards. Some violations cannot be remedied after damage is done. It makes no sense for Virginia to follow a path that is known to lead to water pollution.
- DEQ’s proposal is not based on comprehensive analysis of each water crossing, and would not ensure that Virginia water quality standards upheld. I urge you to reject the DEQ recommendation, and to deny or table this harmful proposal and protect the water quality of Virginia and my community.