

BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE

Dec. 13, 2018
1828 Brandon Ave. SW
Roanoke, VA 24015

Members of the Virginia State Water Control Board:

I am commenting on behalf of the Blue Ridge Environmental Defense League. BREDL is a registered Virginia non-profit corporation. We have members throughout Virginia.

We respectfully request that the State Water Control Board revoke the 401 certification for both the Mountain Valley and the Atlantic Coast Pipelines. In addition, we request that a Stop Work Order be imposed for both the MVP and ACP pipelines.

Since the August SWCB meeting, there have been significant developments. The U.S. Army Corps of Engineers has suspended the Nationwide 12 permits for both the MVP and ACP pipelines. As you know, this Nationwide 12 permit, along with several additional requirements, are stated in the 401 certification as "reasonable assurance that water quality standards will not be violated." Thus, without a Nationwide 12 permit, the 401 certification is currently invalid.

Also since your August meeting, there have been several major violations despite this board's efforts to prevent further degradation of the state's waterways along these pipelines. It should be very clear to this board, because it is very clear to the general public, that these pipelines are creating severe impacts to our water resources.

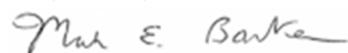
In August the board voted "to continue aggressive compliance, inspection and enforcement activities to the maximum extent of its authority..." In last week's court filing, the Attorney General on your behalf, asked the court to "assess a civil penalty ...to the maximum allowed by law". In turn, we strongly urge this board to adhere to your August motion and use your power to use aggressive "enforcement ... to the maximum extent" of your authority.

Therefore, we respectfully request this board revoke the 401 certification for both the Mountain Valley and Atlantic Coast pipelines AND direct the Virginia Department of Environmental Quality to issue a Stop Work Order for both pipelines.

How can you ask the court system to penalize the pipeline companies when you won't do it yourselves?

Thank you for this opportunity to comment.

Respectfully submitted,



Mark E. Barker
Executive Assistant
BREDL