

CAMPAIGN FOR VIRGINIA'S WATER FUTURE
A People's Platform for Change

We, the undersigned groups,
call on the Virginia State Water Control Board to take the actions enumerated below. Experience has proven that these measures are necessary to protect state waters from serious and widespread degradation. The Board has a duty to act on these issues, in accordance with its statutory responsibilities. Virginians have a right to expect that the protections promised by law be provided.

- I. Enforce Virginia's Narrative Water Quality Criteria - Require the Department of Environmental Quality to fully enforce narrative water quality criteria defined in the Water Quality Standards regulations, including particularly the prohibitions against substances that produce turbidity and color, and which nourish undesirable or nuisance aquatic plant life. Require that DEQ report to the Board no later than January 1, 2021 how the narrative criteria are being implemented in ongoing regulatory processes and in preparation of the final Integrated Report for 2020.
- II. Adopt Numeric Turbidity or Solids Criteria - Require the Department of Environmental Quality to begin a formal process to adopt numeric criteria for turbidity and/or suspended solids for all state waters, by providing the Registrar of Regulations with a Notice of Intended Regulatory Action no later than November 1, 2020.
- III. Adopt Numeric Nutrient Criteria - Require the Department of Environmental Quality to begin the formal process to adopt numeric criteria for nitrogen and phosphorus for all state waters, by providing the Registrar of Regulations with a Notice of Intended Regulatory Action no later than November 1, 2020.
- IV. Ensure Permits and Certifications Enforce Water Quality Criteria - Require the Department of Environmental Quality to perform water quality impact analyses for every VPDES permit and every CWA section 401 water quality certification, including every general permit or certification, to determine whether water quality- based controls are necessary to protect waters, in addition to technology-based controls. Require the DEQ to report back to the Board on the status of its compliance with this order in relation to ongoing permitting or regulatory processes no later than January 1, 2021, and annually on the same date thereafter.

Sincerely,

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**CAMPAIGN FOR VIRGINIA'S WATER FUTURE
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