

**Supplemental Environmental Impact
Statement
Scoping Process**

Summary Report

**Surry Power Station
Unit Nos. 1 and 2
Surry County, Virginia**

May 2019



**U.S. Nuclear Regulatory Commission
Rockville, Maryland**

Introduction

On October 15, 2019, the U.S. Nuclear Regulatory Commission (NRC) received an application from Dominion Energy (Dominion). The application requested subsequent license renewal of the operating licenses for the Surry Power Station Unit Nos. 1 and 2 (Surry). Surry is located in Surry County, Virginia, about 17 miles north west of Newport News, Virginia. In its application, Dominion requests subsequent license renewal for a period of 20 years beyond the dates when the current renewed operating licenses expire. Specifically, the new expiration dates would be May 25, 2052 for Surry Unit No. 1 and January 29, 2053 for Surry Unit No. 2.¹

The purpose of this report² is to provide a concise summary of the determination of the scope of the NRC staff's environmental review of this application, incorporating stakeholder inputs. This report will briefly summarize the issues identified by the environmental impact statement scoping process associated with the NRC staff's review of Dominion's subsequent license renewal application.

This report is structured in three sections:

- A. The Surry Public Scoping Period
- B. Public Comments and Responses
- C. List of Commenters

A. The Surry Public Scoping Period

Background

The Surry application and all other public documents relevant to the subsequent license renewal are available in the NRC's Agencywide Documents Access and Management System (ADAMS). The ADAMS Public Electronic Reading Room is accessible at <http://www.nrc.gov/reading-rm/adams.html>. Persons who encounter problems in accessing documents in ADAMS should contact the NRC's Public Document Room (PDR) reference staff by telephone at 1-800-397-4209 or 301-415-4737 or by e-mail at pdr.resource@nrc.gov.

For additional information, the NRC staff has made available a Web site with specific information about the Surry subsequent license renewal application at <https://www.nrc.gov/reactors/operating/licensing/renewal/applications/surry-subsequent.html>. This website includes application information, the licensing schedule, opportunities for public involvement, project manager information, and other relevant information. In addition, important documents, including public comments, are available at the Federal rulemaking Web site <https://www.regulations.gov/>, under Docket ID NRC-2018-0247.

On October 15, 2019, as part of its application, Dominion submitted an environmental report (ER) to the NRC, available at ADAMS accession number ML18291A842. Dominion prepared the ER in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51, which

¹ The Surry Unit No. 1 current renewed operating license (DPR-32) expires at midnight on May 25, 2032; the Surry Unit No. 2 current renewed operating license (DPR-37) expires at midnight on January 29, 2033.

² The NRC's requirements for conducting the scoping process and for preparing a scoping summary report are found at 10 CFR 51.29.

contains the NRC's requirements for implementing the National Environmental Policy Act of 1969, as amended (NEPA).³ Dominion subsequently supplemented its application by letter dated January 29, 2019 (ADAMS Accession No. ML19042A137).

Renewal of a power reactor operating license requires preparation of a supplemental environmental impact statement (SEIS) which is a supplement to the Commission's NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (GEIS). The GEIS is available in two volumes at ADAMS Accession Nos. ML13106A241 and ML13106A242. In the GEIS, the NRC staff identified and evaluated the environmental impacts associated with license renewal of nuclear power plants. The NRC determined that several environmental issues were generic to all nuclear power plants (or, in some cases, to a distinct subset of plants having specific characteristics such as a type of cooling system). These generic issues were designated as "Category 1" issues. An applicant for license renewal may adopt the conclusions contained in the GEIS for Category 1 issues without further evaluation, unless there is new and significant information that may cause the conclusions for its plant to differ from those of the GEIS. Other issues that were not determined generically and that require a site-specific review were designated as "Category 2" issues and are required to be evaluated in the applicant's environmental report.

Scoping Process and Objectives

The first step in developing an SEIS is to conduct a public scoping process. On December 20, 2018, the NRC published a *Federal Register* (FR) Notice describing the scoping process for the Surry subsequent license renewal application environmental review (83 FR 65367). This FR notified stakeholders of the NRC staff's intent to prepare a plant-specific supplement to the GEIS and provided the public with an opportunity to participate in the environmental scoping process. The Notice invited members of the public to submit written comments by January 22, 2019. In addition to written comments, oral comments were recorded at the public meetings held on January 8, 2019 in Surry, Virginia. All comments, whether written or oral, were considered in the NRC's scoping process.

The scoping process provided an opportunity for members of the public to propose environmental issues to be addressed in the SEIS and to highlight public concerns and issues. This scoping summary report provides a summary of what the NRC heard during the scoping process, including a summary of the determinations and conclusions reached during the scoping process. The NRC's stated objectives of the scoping process were to:

- Define the proposed action, which is to be the subject of the supplement to the GEIS;
- Gather data on the scope of the supplement to the GEIS and identify the significant issues to be analyzed in depth;
- Identify and eliminate from detailed study those issues that are peripheral or are not significant or were covered by a prior environmental review;
- Identify any environmental assessments and other EISs that are being or will be prepared that are related to, but are not part of, the scope of the supplement to the GEIS being considered;
- Identify other environmental review and consultation requirements related to the proposed action;

³ The NRC's requirements for an environmental report supporting a license renewal application are found at 10 CFR 51.53(c)(3).

- Indicate the relationship between the timing of the preparation of the environmental analyses and the Commission's tentative planning and decision-making schedule;
- Identify any cooperating agencies and, as appropriate, allocate assignments for preparation and schedules for completing the supplement to the GEIS to the NRC and any cooperating agencies; and
- Describe how the supplement to the GEIS will be prepared, including any contractor assistance to be used.

The NRC staff's determinations and conclusions regarding the above objectives follow.

Define the Proposed Action

The NRC's proposed action in this instance is to determine whether to renew the Surry operating licenses for an additional 20 years.

Scope of Review, Significant Issues, and Issues that are not Significant

The scope of the SEIS includes an evaluation of the environmental impacts of and reasonable alternatives to Surry's subsequent license renewal. The "Scoping Comments and Responses" section of this report includes specific issues identified by the scoping comments. The NRC staff's responses explain whether the issues will be addressed in the SEIS and, if so, where in the SEIS they will be addressed. Issues that are not significant, or otherwise out of scope (e.g., peripheral issues), are identified as well.

For Surry's subsequent license renewal, the NRC staff will follow the structure provided in the GEIS. The GEIS evaluates 78 environmental issues related to plant operation and classifies each issue as either a Category 1 issue (generic to all or a subset of nuclear power plants) or a Category 2 issue (specific to individual power plants). Unless new and significant information is discovered, the NRC will rely on the conclusions in the GEIS for all Category 1 issues. The NRC will reconsider generic impacts in the SEIS where there is new and significant information. All Category 2 issues will be discussed in depth in the SEIS.

The following areas were the subject of the scoping comments:

- Greenhouse Gas and Climate Change
- Cultural Resource
- Terrestrial Resources
- Radioactive Waste
- Alternatives
- Aquatic Resources
- Editorial
- License Renewal Process and NEPA
- Outside of Scope – General Support or Opposition to License Renewal
- Outside of Scope – Current Operational Issues or Safety Concerns
- Outside of Scope – License Renewal Process Adequacy
- Outside of Scope – Emergency Evacuation
- Outside of Scope – Terrorist Concerns

Identification of Related Environmental Assessments and other EISs

The NRC staff did not identify any environmental assessments being or soon to be prepared, which relate to, but are not within the scope of the SEIS. Prior completed EISs will be used in the preparation of the Surry SEIS, including the Final Environmental Statement, the license renewal GEIS, and the license renewal SEIS that was prepared for the (a) construction of Surry and (b) initial license renewal of Surry, Units 1 and 2.

Other Environmental Review and Consultation Requirements

In parallel with its NEPA review, the NRC staff is consulting with the U.S. Fish and Wildlife Service (FWS) and National Marine Fisheries Service under Section 7 of the Endangered Species Act of 1973 (ESA) to evaluate the potential impacts of the operation of Surry for an additional 20 years on endangered and threatened species and their critical habitat. Consistent with 36 CFR 800.8(c), the NRC staff is also consulting with affected Indian Tribes and the State Historic Preservation Officer (SHPO) of Virginia to fulfill its Section 106 obligations under the National Historic Preservation Act of 1966 (NHPA).

Timing of Agency Action

Upon completion of the scoping process and site audits, completion of its review of Dominion's environmental report and related documents, and completion of its own independent evaluations, the NRC staff will compile its findings in a draft SEIS. The NRC staff will make the draft SEIS available for public comment. Based on the information gathered during this public comment period, the NRC staff will amend the draft SEIS findings, as necessary, and will then publish the final SEIS. In accordance with 10 CFR 51.102 requirements, the NRC will prepare and provide a Record of Decision in accordance with 10 CFR 51.103. Concurrent with but separate from the environmental review, the NRC will document its safety review in a safety evaluation report (SER). The findings in the SEIS and the SER will be considered in the NRC's decision to issue or deny the subsequent renewed license.

The NRC staff's current schedule is to reach a decision on the subsequent license renewal by June 2020.

Identification of Cooperating Agencies

No other federal agencies are participating in the environmental review as a cooperating agency.

How the SEIS will be Prepared, Including Contractor Assistance

The SEIS will be prepared by the NRC staff with contract support from Pacific Northwest National Laboratory (PNNL). The PNNL will assist the NRC staff with data gathering regarding demographic information.

Future Opportunities for Public Participation

The NRC staff plans to issue a draft SEIS (DSEIS) for public comment in September 2019. The DSEIS comment period will offer an opportunity for the participants such as the applicant, interested Federal, State, and local government agencies, Tribal governments, local organizations, and members of the public to provide further input to the NRC's environmental

review process. The comments received on the DSEIS will be considered in the preparation of the final SEIS (FSEIS). The FSEIS, along with the NRC staff's safety evaluation report (SER), will identify the information considered and evaluations performed by the NRC staff and will provide the basis for the NRC's decision on Dominion's application for subsequent renewal of the Surry operating licenses.

Scoping Process Conclusion

The comments provided during the environmental scoping process identified many important issues that will be addressed by the NRC staff in its DSEIS for Surry's subsequent license renewal. Issues which do not pertain to the staff's environmental evaluation or are beyond the scope of subsequent license renewal will not be considered in the DSEIS.

B. Public Comments and Responses

During the scoping period (83 FR 65367), the NRC received scoping comments as inputs for the SEIS. The NRC's responses to scoping comments are summarized in this section of the report. Comments were grouped based on being in scope or out of scope, and comments with similar themes were further subgrouped to capture the resources concerned.

Each comment submittal was uniquely identified and when a submittal addressed multiple issues, the submittal was further divided into separate comments with tracking identifiers.

Section C of this report contains a table that identifies the commenters, their affiliation if provided, and the ADAMS Accession number that can be used to locate the correspondence.

B.1 Comments in Scope

B.1.1 Greenhouse Gas and Climate Change

Comment Summary (SPS-2-1, SPS-7-2a): These comments provide inputs for the SEIS that nuclear power is less greenhouse gas intensive (including carbon).

Response: *Sections 4.15.3 of the SEIS will describe the greenhouse gas impacts of continued operation of Surry relative to alternatives, including power generation based on renewable energy.*

Comment Summary (a portion of SPS-11-1, SPS-12-3): These comments provide inputs for the SEIS expressing concerns about future climate change impacts on Surry regarding sea level rise and storm vulnerability.

Response: *Sections 4.15.3 and 4.16 of the SEIS will describe climate change impacts including sea level rise and storm vulnerability.*

Comment Summary (SPS-3-1): This comment provides inputs for the SEIS expressing concerns about the carbon impacts of the entire nuclear fuel chain associated with nuclear reactor operation (i.e., uranium fuel cycle).

Response: *Section 4.15 of the SEIS will describe the greenhouse gas, including carbon, impacts of the uranium fuel cycle.*

Comment Summary (SPS-18-2, SPS-14-1): These comments provide inputs for the SEIS that Surry nuclear reactors, as baseload “green” energy sources, are vital supports for the development of power generation based on renewable energy.

Response: *Section 4.15 of the SEIS will describe the greenhouse gas impacts of continued operation of Surry relative to alternatives, including power generation based on renewable energy.*

B.1.2 Cultural Resources

Comment Summary (SPS-13-4b): This comment notes that Surry is located in a section of the James River designated as a scenic river in the state of Virginia.

Response: *Sections 3.9 and 4.9 of the SEIS will describe and evaluate the effects of plant operations, respectively, on historic and cultural resources adjacent to the scenic section of the James River.*

B.1.3 Terrestrial Resources

Comment Summary (SPS-2-3, SPS-14-3): These comments provide input for the SEIS explaining how Dominion coordinates with state agencies to manage terrestrial resources on and around the SPS.

Response: *Section 3.6 of the SEIS will describe the ongoing efforts by Dominion to coordinate with state agencies in managing terrestrial resources on the SPS and adjoining Hog Island Wildlife Management Area.*

Comment Summary (SPS-13-6, SPS-24-2): These comments provide inputs for the SEIS about terrestrial resources including state-listed threatened and endangered species (e.g., northern long-eared bats, peregrine falcon, bald eagles, colonial waterbirds, etc.), in the vicinity of the SPS.

Response: *Sections 3.6 and 4.6 of the SEIS will describe state-listed species occurring in the vicinity of the SPS, how those species and other terrestrial resources are affected by Surry’s ongoing efforts to work with state agencies to manage terrestrial resources potentially affected by the SPS. Appropriate sections of the SEIS will also address how reasonable alternatives to relicensing the SPS may affect terrestrial resources.*

B.1.4 Radioactive Waste

Comment Summary (SPS-3-2, a portion of SPS-11-1): The comments of SPS-3-2 and a portion of SPS-11-1 provide inputs for the SEIS expressing concerns about nuclear waste management at Surry.

Response: *Sections 3.13 and 4.13 of the SEIS will describe Waste Management at Surry.*

B.1.5 Alternatives

Comment Summary (SPS-7-2b, SPS-16-2, SPS-17-2, a portion of SPS-11-1): These comments provide inputs for the SEIS about Surry license renewal in comparison to solar and wind alternatives.

Response: *Chapters 2 and 4 of the SEIS will compare Surry license renewal with other alternatives including solar and wind power.*

B.1.6 Aquatic Resources

Comment Summary (SPS-13-2, SPS-13-3, SPS-13-5, SPS-22-1, SPS-22-2): These comments provide inputs for the SEIS about impacts to aquatic species such as the Ohio River shrimp and possible impacts on mortality of anadromous fishes. The comments also recommended the EIS should evaluate the alternatives required to ensure compliance with the Clean Water Act, in particular by using the appropriate cooling water intake structure requirements, monitoring conditions, recordkeeping and reporting requirements.

Response: *Chapters 3 and 4 of the SEIS will describe impacts on aquatic species including the Ohio River shrimp and the status of compliance regarding Clean Water Act.*

Comment Summary (SPS-13-1, SPS-13-4a, SPS-13-5, SPS-24-1): These comments provide inputs for the SEIS about special status species such as the Atlantic sturgeon, a federally listed endangered species, in the vicinity of the Surry site.

Response: *Chapters 3, 4, and Appendix C “Consultation” of the SEIS will describe impacts on special status species including the endangered Atlantic Sturgeon.*

B.1.7 Editorial

Comment Summary (SPS-23-1): This comment suggests the use of U.S. Geological Survey topographic maps in the development of the SEIS.

Response: *The NRC staff will consider the use of maps for illustration purposes in the development of Chapters 3 and Chapter 4 of the SEIS, as appropriate.*

B.1.8 License Renewal Process and NEPA

Comment Summary (SPS-23-2): The comment provides information on the availability of online information regarding the Commonwealth of Virginia’s Coastal Zone Management Act of 1972 federal consistency review requirements in addition to other available online regulatory and environmental resource information that may be of assistance to the NRC in preparing its NEPA environmental review.

Response: *The NRC staff will describe the affected environment at Surry in Chapter 3 of the draft SEIS including Dominion’s compliance with applicable environmental quality standards and requirements. The staff will specifically describe the status of Dominion’s compliance with the Coastal Zone Management Act of 1972 regarding subsequent license renewal of Surry in Section 3.2 of the draft SEIS. All references cited will be listed in Chapter 6 of the SEIS.*

B.2 Comments Out of Scope

B.2.1 General Support or Opposition to License Renewal

Comment Summary (SPS-1-1, SPS-2-2, SPS-2-3b, SPS-2-5, SPS-2-4, SPS-4-1, SPS-5-1, SPS-6-1, SPS-8-1, SPS-14-2, SPS-14-3b, SPS-14-4, SPS-15-1, SPS-16-1, SPS-17-1, SPS-18-

1): The comments express general support for license renewal of Surry Power Station, describing Surry as (a) being a good neighbor, (b) vital to local socioeconomics, (c) using groundwater protection that is compatible with the local groundwater dependent community, (d) using environmental policy that is compatible with U.S. regulations, (e) providing safe, reliable, and affordable electricity (baseload), (f) compatible with safe local fish and water recreation, (g) using robust aging management programs supported by DOE and EPRI research, (h) important to State defense program facilities, (i) being a positive contributor to clean air.

Comment Summary (SPS-9-1): This comment expresses general opposition to license renewal of Surry, stating that license renewal “will never be safe.”

Response: *The comments express general support for or opposition to license renewal and contain no technical or significant information, beyond the information presently under consideration by the NRC staff. These comments are not considered further in the SEIS.*

B.2.2 Current Operational Issues or Safety Concerns

Comment Summary (SPS-3-3a, SPS-3-3b, SPS-3-4, SPS-6-2, SPS-3-5, SPS-7-1, SPS-3-6, SPS-14-5, SPS-19-1, SPS-12-2, SPS-12-4, SPS-12-1, SPS-21-1a, SPS-21-1b): The comments express concerns about Surry current operational issues (e.g., historical injury and death from industrial mishaps, (b) incomplete safety commitment tracking and inspection, (c) safety relief or exemption and license amendment) or material aging management programs (e.g., (a) need for a robust aging management review of thousands of review items, (b) cooling pipe wall thinning, (c) need for robust extended-condition reviews of site-specific event reports, maintenance reports, and corrective action reports, (d) general material corrosion and erosion).

Response: *Current operational safety issues are outside the scope of the environmental review. The NRC addresses these areas of performance as part of its ongoing regulatory oversight of operating nuclear power plants. This oversight will continue during the Surry period of extended operation if the licenses are renewed. More information about the Reactor Oversight Process is available at <https://www.nrc.gov/reactors/operating/oversight.html>. These comments are not considered further in the SEIS.*

The comments expressing safety concerns regarding material aging management programs are also outside the scope of the environmental review. The material aging management of structures and components within the scope of the license renewal safety review will be addressed in the staff’s safety evaluation report for Surry. In its aging management review, the staff examines Dominion’s programs and processes designed to manage the effects of structure and component aging and to ensure adequate protection of the public’s health and safety during the 20-year license renewal period. This may result in additional aging management measures as necessary. This is separate from the environmental review which focuses on the environmental impacts of license renewal. These comments are not considered further in the SEIS.

B.2.3 License Renewal Process Adequacy

Comment Summary (SPS-12-1, SPS-20-1, SPS-21-2): These comments express concerns about the adequacy of the NRC’s license renewal process regarding the allowance of the application submittals (e.g., (a) premature application concern, (b) Surry operation is less than 10 years in a 20-years renewed license).

Response: *The NRC meets its NEPA obligation by following 10 CFR Part 51, “Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions.” For license renewal, 10 CFR 54.17, “Filing of application” allows application submittals to be no earlier than 20 years before the expiration of the operating license currently in effect. Regarding power alternatives to Surry, it may take 10 years for new power plants to be designed and constructed and this is a consideration of the energy decision-makers (e.g., the plant owners, the State, or other agencies). These comments on the adequacy of NRC regulations are beyond the scope of the environmental review. Members of the public who believe that NRC regulations should be amended or rescinded may file a petition for rulemaking according to the provisions of 10 CFR § 2.802. These comments are not considered further in the SEIS.*

B.2.4 Emergency Evacuation

Comment Summary (a portion of SPS-11-1): A portion of this comment expresses concern about whether there are emergency evacuation plans.

Response: *Local and State governments have the responsibility and authority for Emergency evacuation plan. The NRC has the role of advising and assisting the local and State officials during emergency evacuation. Emergency evacuation plans are beyond the scope of the environmental review. This comment is not considered further in the SEIS.*

Emergency preparedness requirements for the licensees related to emergency planning are set out in the NRC’s regulations at 10 CFR 50.47 and Appendix E to 10 CFR Part 50. The NRC has these regulations in place to ensure that emergency preparedness plans are updated throughout the life of all plants. For example, nuclear power plant operators are required to update their evacuation time estimates after every U.S. Census, or when changes in population would increase the estimate by either 25 percent or 30 minutes, whichever is less. Additionally, the NRC assesses the capabilities of the nuclear power plant operator to protect the public by requiring the performance of a full-scale exercise—that includes the participation of various Federal, State, and local government agencies—at least once every two years. These exercises are performed in order to maintain the skills of the emergency responders and to identify and correct weaknesses.

B.2.5 Terrorist Concerns

Comment Summary (a portion of SPS-11-1): A portion of this comment expresses concerns that Surry is a terrorist target.

Response: *Surry is subject to existing NRC requirements related to physical security, including protection against potential terrorism, as part of its current licensing basis. The NRC’s regulations in 10 CFR Part 73 set out requirements related to physical security. These requirements apply to all operating licenses and will continue to apply to facilities with subsequent renewed licenses. This comment is not considered further in the SEIS because issues related to operation under Surry’s current license are outside the scope of this environmental review.*

As a part of the NRC oversight activities, the staff performs these reviews throughout the period of an operating license, whether the original or renewed license. The staff will address any identified security issues promptly, in accordance with the Surry license, including

order issuance to ensure compliance. Information on the background of nuclear security and past security orders issued by the NRC to nuclear power plants, including Surry, can be found at: <http://www.nrc.gov/reading-rm/doc-collections/fact-sheets/security-enhancements.html>

C. List of Commenters

The following tables present the comments received by the NRC and the commenters. Table C-1 provides a list of commenters identified by name, affiliation (if stated), the commenter identification (ID) number, the comment source, and the ADAMS accession number.

Table C-1 - Individuals Providing Comments during the Scoping Comment Period

Commenter	Affiliation (if stated)	Commenter ID	Comment Source	ADAMS Accession Number
Sanford Wanner	Surry County	SPS-1	Scoping Public Meeting - Transcript	ML19024A199
Fred Mladen	Dominion Energy	SPS-2	Scoping Public Meeting - Transcript	ML19024A199
Erica Gray	Richmond County VA	SPS-3	Scoping Public Meeting - Transcript	ML19024A199
Paul Phelps	Dominion Energy	SPS-4	Scoping Public Meeting - Transcript	ML19024A199
Jennifer Gwaltney	Surry County	SPS-5	Scoping Public Meeting - Transcript	ML19024A199
Helen Eggleston	Public – local resident	SPS-6	Scoping Public Meeting - Transcript	ML19024A199
Mike Eggleston	Public – local resident	SPS-7	Scoping Public Meeting - Transcript	ML19024A199
Judy Lyttle	Surry County	SPS-8	Scoping Public Meeting - Transcript	ML19024A199
Erica Gray	Henrico, VA	SPS-9	Regulation.gov	ML19016A093

Commenter	Affiliation (if stated)	Commenter ID	Comment Source	ADAMS Accession Number
Fran Adams	Upper Mattaponi Tribe	SPS-10	Email	ML19025A154
Scott Burger	Richmond VA	SPS-11	Regulation.gov	ML19016A094
Kay Patrick	Public	SPS-12	Regulation.gov	ML19016A096
Tyler Meader	Department of Conservation and Recreation VA	SPS-13	Regulation.gov	ML19017A013
Fred Mladen	Dominion Energy	SPS-14	Scoping Public Meeting - Submittal	ML19016a505
Teresa Beale	Franklin-Southampton Area Chamber of Commerce	SPS-15	Scoping Public Meeting - Submittal	ML19016a506
Bryan Stephens	Hampton Roads Chamber of Commerce	SPS-16	Scoping Public Meeting - Submittal	ML19016a507
Robert Herbert	Hampton Roads Economic Development Alliance	SPS-17	Scoping Public Meeting - Submittal	ML19016a508
Craig Quigley	Hampton Roads Military and Federal Facilities Alliance	SPS-18	Scoping Public Meeting - Submittal	ML19016a509
David Martin	Chester VA	SPS-19	Regulation.gov	ML19025A146
Glen Besa	North Chesterfield VA	SPS-20	Regulation.gov	ML19025A149

Commenter	Affiliation (if stated)	Commenter ID	Comment Source	ADAMS Accession Number
Scott Price	Alliance for a Progressive Virginia	SPS-21	Regulation.gov	ML19025A150
Randal Owen	Marine Resources Commission VA	SPS-22	Regulation.gov	ML19025A152
Bettina Rayfield	Virginia Department of Environmental Quality	SPS-23	Email	ML19046A009
Amy Ewing	Virginia Department of Game & Inland Fisheries	SPS-24	Email	ML19046A052

Meeting Transcripts, Comment Letters, and E-mails

The following pages contain comments from public meeting transcripts and submittals

ADAMS Accession No. ML19140A449