

## MEMORANDUM

**DATE:** April 26, 2019  
**TO:** Virginia Department of Planning and Budget  
**FROM:** Virginia Department of Health  
**SUBJECT:** Board of Health Waterworks Regulations, 12VAC5-590-10 *et seq.*

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The Virginia Department of Health concurs with the findings of the Department of Planning and Budget's Economic Impact Analysis of the Board of Health's Waterworks Regulations, 12VAC5-590.

Regarding the determination of whether a groundwater source is under the direct influence of surface water (GUDI), VDH estimates that of approximately 100 GUDI determinations that waterworks will complete each year, no more than 10 waterworks will trigger the requirement to proceed to Step 3. VDH concurs with the assessment that the benefits of the Step 3 requirements likely exceed the cost.