Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Summary of Public Comments and DEQ Responses

Virginia Water Protection Permit Program (VWP), Surface Water Withdrawal Permit for Tribrook Club, LLC, VWP Permit No. 24-2886

June 23, 2026

This document provides a summary of the public comments received and Department of Environmental Quality (DEQ) staff responses from the public comment periods associated with the draft Virginia Water Protection (VWP) surface water withdrawal permit for the Tribrook Club, LLC. This permitting action is a controversial permit as defined by the Code of Virginia § 10.1-1184.1.

Proposed Permit Action:
Issuance of VWP Permit No. 24-2886

Applicant:
Tribrook Club LLC
(Formerly Lexington Golf & Country Club (LGCC /W&L Joint Venture, LLC))

Background:
On March 28, 2025, the Department of Environmental Quality (DEQ) received a Joint Permit Application for a Virginia Water Protection Permit for surface water withdrawals and proposed impacts at the Lexington Golf & Country Club (Project). The Project is an existing 18-hole golf course, formerly owned and operated by LGCC/W&L LLC, now Tribrook Club (Applicant). The Applicant is seeking a new VWP permit for impacts related to golf course reconstruction and surface water withdrawals for irrigation of approximately 110 acres. The existing 18-hole golf course was initially constructed in the early 1900's and reconstructed in the 1970's. The grounds include typical golf course features such as bridges, bunkers, tees, greens, fairways, roughs, and consist of cool season grasses. An existing pumphouse and three impoundments include a 4.4 Mgal impoundment (Irrigation Lake), an impoundment at Hole 17 (Hole #17 Impoundment), and a pond at Hole 4. The irrigation system is supplied by the pumphouse located on the Irrigation Lake. The Project includes upgrading the golf course irrigation system, replacement of the previous surface water withdrawal intake and infrastructure which was previously excluded from water withdrawal permitting, culvert and bridge replacements, dredging of onsite waterbodies, bank alterations to onsite waterbodies, and the installation of new release control structures on the Irrigation Lake

Preparation of the Draft Permit:
Draft VWP Permit No. 24-2886 was coordinated with the Applicant for review on December 18, 2025. DEQ received the Applicant's concurrence of the draft permit on December 31, 2025.

Draft Permit Public Notice Publication:
The public notice for the draft VWP Permit No. 24-2886 was published in the *News Gazette* on January 7, 2026. The public notice was published on the DEQ website for the duration of the public comment period. The comment period extended from January 7, 2026, through February 6, 2026.

Requests for a Public Hearing:
During the 30-day draft permit public comment period, 110 comments were received from local citizens from Rockbridge County and the City of Lexington, riparian landowners along Woods Creek, and environmental organizations. Of the 110 comments received, 102 contained requests for a public hearing. All commenters requesting a hearing satisfied the requirements of 9VAC25-210-165 B. A public hearing was authorized by DEQ on March 5, 2026.

Hearing Public Notice Publication
Notice of the public hearing was published on the Virginia Regulatory Town Hall on March 16, 2026, and published in the *News Gazette* on March 18, 2026. The public hearing comment period ran from March 18 – May 8, 2026. The public hearing was held on April 23, 2026, at Rockbridge County High School from 6:00pm to 9:00pm.

Public Hearing & Hearing Comment Period
During the public hearing held on April 23, 2026, 26 members of the public provided in-person verbal comments. During the 51-day public hearing comment period, from March 18 through May 8, 2026, 45 additional written comments were received from local citizens from Rockbridge County and the City of Lexington, riparian landowners along Woods Creek, and environmental organizations. The total number of verbal and written comments received by DEQ for the public hearing comment period was 71.

Summary of Public Comments & DEQ's Response:
A summary of the public comments received during the draft permit comment period and the public hearing comment period, and DEQ's response is included below. The public comments received are grouped by category; Department responses are in italics.

1. **Water Quality, Aquatic Life, & Human Health**
   Commenters expressed concern that both historic and current reconstruction activities at the golf course have degraded water quality in Woods Creek, nearby tributaries and groundwater. Commenters reported observing sediment plumes, chemical odors, changes in water color, and declines in aquatic species, including crayfish mortality that several commenters linked to herbicide applications during de-grassing in fall 2025. Commenters cited contamination in onsite groundwater wells, particularly PFAS, lead, and chromium. Commenters are concerned that using contaminated groundwater for irrigation would spread

compounds of significant toxicological concern through runoff and groundwater infiltration. Additionally, the use of pesticides, herbicides, and fertilizers applied to the course poses serious risks to amphibians, fish, and benthic macroinvertebrates. Concerns were expressed for human users downstream, especially children and residents with wells close to the course. Many commenters stressed that Woods Creek is already impaired and that any additional chemical loading from golf course practices would further diminish dissolved oxygen levels, increase algal growth, and compromise ecosystem health. Some highlighted the risk of "contaminant cycling" in irrigation ponds, where sediments can act as chemical reservoirs releasing toxins downstream. Overall, commenters expressed that actions on the course and the proposed project are contributing to water quality concerns and impairments within the Woods Creek watershed. Due to these concerns, commenters requested increased buffer zones for chemical applications, increased flow downstream of the Irrigation Lake impoundment, lowered chemical use in golf course management, and the elimination of groundwater use for golf course irrigation.

DEQ Response:

Draft VWP Permit No. 24-2886 includes conditions to avoid and mitigate impacts to water quality and ensure protection of beneficial uses. Part I-Special Conditions G 1 requires a 20-foot buffer around all surface waterbodies where no fertilizers, fungicides, herbicides, or insecticides may be applied. Additionally, Part I-Special Conditions G 3 requires Lexington Golf & Country Club to adhere to a Nutrient Management Plan approved by the Department of Conservation & Recreation prior to turf establishment to mitigate water contamination. It should be noted that application of pesticides that may result in a discharge to surface waters is governed under the Virginia Pollutant Discharge Elimination System (VPDES) General Permit for Discharges Resulting from the Application of Pesticides to Surface Waters of Virginia (9VAC25-800). It is the responsibility of the Applicant to adhere to manufacturer instructions for all chemicals utilized in course management, and to ensure appropriate licensing or certification for all individual chemical applicators.

Additionally, Part I-Special Condition E 7 has been added to the permit requiring additional sampling prior to use of the Irrigation Well. The Applicant is required to develop a Water Quality Monitoring Plan, including three initial tests to measure lead concentrations in groundwater from the well. The monitoring plan and test results are to be provided to the Department for review and approval prior to use of the well for supplemental irrigation purposes. Additionally, the Applicant must provide sampling results to the Department on each semi-annual report for the initial three years of the permit term. The well that had measured PFAS levels of concern has been fully decommissioned in accordance with Virginia Department of Health (VDH) procedures; the Applicant provided proof of abandonment to DEQ on April 16, 2026.

2. Riparian Buffers, Erosion, & Sedimentation

Commenters noted that buffer loss and sedimentation were contributing to continued degradation of Woods Creek, an impaired stream, and undermining decades of community restoration efforts within the watershed. Commenters expressed concern regarding the loss, removal, and degradation of riparian buffers along Woods Creek and other waterbodies on

the club property. Commenters reported tree clearing, turf stripping, and heavy machinery use had increased erosion resulting in turbid water downstream. Commenters included that increased sedimentation was observed following rain events in December 2025. Commenters observed repeated sediment discharges during and after storm events and many described increased sediment and turbidity extending downstream to the Maury River. Commenters asserted that the golf course's erosion controls were inadequate and poorly maintained. Commenters stated observed silt-fence failures, lack of vegetated buffers, and poor stormwater control that directed runoff directly into surface waters. Commenters requested increased buffer of up to 100ft, stating the draft permit requirement of 20ft is inadequate.

DEQ Response

Rockbridge County is the Virginia Erosion & Sediment Management Plan Authority for the Lexington Golf & Country Club project. Prior to construction, the locality reviewed and approved an erosion and sediment control plan and stormwater management plan provided by the Applicant. Subsequently, the Department issued CGP VAR10V993 for the proposed activity to be overseen by the locality. Numerous inspections have been conducted by DEQ and locality inspectors due to concerns raised by citizens in the area, and observations of sedimentation downstream in Woods Creek. As a result of these inspections, a warning letter was issued by DEQ to the Applicant on March 11, 2026, to address stormwater management, and erosion & sediment control issues at Lexington Golf & Country Club. This letter also addressed one unauthorized impact below the Hole #17 Impoundment. The *Applicant implemented the following additional control measures to address stormwater management:*

- *Tarp Dumpsters;*
- *An updated Pollution Prevention Plan;*
- *A modified de-watering barrel on the Sediment Basin riser;*
- *A secondary six-inch pump and dewatering pad;*
- *Rock check dams and straw wattles at the bridge crossing location by course hole numbers three and seven;*
- *An edited road maintenance plan to push on-road sediment elsewhere;*
- *Additional inlet protection to a previously unknown pipe on course hole number nine;*
- *Early installation of pipe on course hole number one due to pipe failure;*
- *Repairs to previously unknown pipe under course hole number ten;*
- *Repairs to areas of silt fencing damaged during land clearing;*
- *Installed temporary seed and straw to assist with sediment runoff; and*
- *Repaired failure to dam related reconstruction work.*
- *Preparing areas for permanent stabilization;*
- *Straw and mulch over temporary seeded area with a focus on riparian zones and course hole numbers ten and eleven;*
- *Spreading topsoil for temporary seeded areas along ground that had been previously stripped of topsoil by stormwater events;*
- *Continuous coordination with locality inspectors to review control measures and add additional measures as needed;*

- *Installation of additional rock filters at bridge crossings on course hole numbers three and seven;*
- *Continued sweeping and cleaning of roadways; and*
- *Daily inspection of all erosion and sediment controls by a certified Responsible Land Disturbance Permit Holder.*

- ***Dam Related Control Measure**s:*
  - *Repair and cleaning of the check dam in the location of failure;*
  - *Operation and monitoring of the additional six-inch pump on a continuous basis;*
  - *New permanent 12-inch drainpipe, concrete pipe, and rock spillway;*
  - *Temporary four-foot dam to provide storage capacity, pump relief, and sediment settling; and*
  - *Installation of a rock outflow at the direction of Rockbridge County officials.*

3. Water Withdrawal Volume, Water Sources, Beneficial Use, & Hydrologic Modeling

Commenters expressed concern with the proposed surface water withdrawal volumes of 0.375 Mgal/day, 9.0 Mgal/month, 30.0 Mgal/year under standard conditions and 45.0 Mal/year during the initial two-year turf establishment period, stating they far exceed what Woods Creek can sustainably provide. Many noted that the creek is reduced to a trickle during summer low-flow periods, and described observed drying, and severely reduced flow, specifically downstream of the golf course. Commenters stated reliance on Kerrs Creek, rather than Woods Creek, for hydrologic modeling was inappropriate and inaccurate. They emphasized that the two watersheds have different geology, rainfall patterns, and flow regimes. Commenters stated that using Kerrs Creek data substantially overestimates available water and underestimates the risk of dewatering, particularly given increasing regional drought frequency.

Commenters also questioned the reliability and long-term availability of supplementary water sources. These sources include the onsite groundwater well used for irrigation, which displayed high lead concentrations in a 2025 sample analysis, and the northern unnamed tributary to Woods Creek many commenters referred to as Moores Creek. They stated this tributary depends on an aging, broken municipal transmission line. Several commenters requested mandatory suspension of withdrawals during drought, stronger minimum flow protections, updated hydrologic studies using new USGS gauge data directly from Woods Creek, and evaluation of downstream impacts, including effects on wildlife, recreational use, and public water supply. Many commenters advocated using municipal water instead of Woods Creek to avoid dewatering a public resource for the benefit of a private club.

DEQ Response

As a part of the VWP permitting process, all applications for individual surface water withdrawal permits undergo internal evaluation, external agency coordination, and a cumulative impact analysis (CIA) to ensure protection of all downstream beneficial uses. The requested water volumes within Draft VWP Permit No. 24-2886 were analyzed utilizing historical withdrawal data, simulated area water availability, and annual water demand based

on golf course size and grass type. The requested daily and monthly withdrawal volumes of 0.375 Mgal/day and 9.0 Mgal/month are calculated to be reasonable based on analyzed course demand. Upon further review and in consideration of concerns expressed by commenters, proposed annual withdrawal volumes have been reduced from 30 Mgal/yr to 27.0 Mgal/year under normal operation and from 45 Mgal/yr to 40.0 Mgal/year during the initial two-year turf establishment period. These annual limitations align with reported water usage and calculated demand for the golf course. Required minimum instream flow (MIF) must be always maintained by the Applicant, and a dedicated two-inch low flow orifice with a flow gauge has been installed to allow adherence to flowby conditions.

The MIF, water withdrawal volume for the two-year establishment period, and withdrawal volumes for years 3-15 of the permit term were coordinated with the Virginia Department of Wildlife Resources (DWR), who expressed support for the proposed MIF. DWR stated the proposed withdrawal volume during the establishment period is not expected to cause significant impacts due to its temporary nature and location within the Maury River watershed. To further protect the Woods Creek watershed, Part I-Special Conditions D 6 & 7 requires the Applicant to adhere to all drought ordinances when an emergency is declared in the area and Lexington Golf & Country Club must submit a Drought Management Plan and Monitoring & Operation Plan to the Department within 180 days of permit issuance. Both plans are required to provide details as to how the Applicant will adhere to permit conditions.

Regarding the CIA conducted by the Department, Kerrs Creek stream gauge (USGS Gauge No. 02022500) data was solely utilized for calculation of the required MIF. The MIF in Draft VWP Permit No. 24-2886 is 90% of the lowest 90-day average flow as read at the Kerrs Creek stream gauge, scaled to the Woods Creek watershed. This is likely higher than 90% of the 90-day low flow for Woods Creek at the intake location due to the larger size and steeper topography of Kerrs Creek's watershed, resulting in a MIF that is more protective of flows downstream from the intake location. The water availability at the intake location was calculated using rainfall runoff data for the area and had no relation to the Kerrs Creek stream gauge. All CIA's conducted by the Department are explicitly conservative, utilizing historical rainfall runoff data to simulate water availability during the most critical drought periods. Once completed, an analysis of the simulated period provides recommendation to protect beneficial uses downstream of surface water intakes, especially during vulnerable drought periods. It is noted that the golf course is in a region with karst geology, however without extensive dye tracing or other studies it is unknown how, if at all, these features affect water availability at the intake location. Modeling procedures followed the same guidelines for other VWP permits located in areas with karst geology; modeling by the Department is conducted utilizing the best available rainfall runoff and topographic data to help ensure accurate water availability simulation.

The northern unnamed tributary to Woods Creek that flows through the golf course is not connected to Moores Creek and is partially fed via a broken water transmission line that connected Lexington Reservoir to the City of Lexington for municipal water supply. This transmission line is no longer in use as City of Lexington municipal water is provided by the Maury River Service Authority. The CIA conducted by the Department utilized area rainfall

runoff data to model the flow in this tributary and did not take into account the additional water provided by the broken transmission line. Therefore, the potential removal of this transmission line does not change the simulated water availability for the golf course. Based on the information provided by the Applicant and modeling conducted by the Department, this tributary is not a significant source of refill for the Irrigation Lake with approximately 8-10% of flow in this tributary diverted via a gravity transmission pipe during high flow periods. This pipe is seldom utilized by the golf course and, as required by Part I D 8 of the Special Conditions added in response to public comments, shall be removed. The Applicant can utilize water storage in the Hole #17 Impoundment, fed by this tributary, to supplement irrigation while maintaining outflow from the impoundment. As previously stated, this tributary is not connected to Moores Creek. Moores Creek exits Lexington Reservoir below the impoundment and flows into North Buffalo Creek west of Lexington Golf & Country Club.

Through Department analysis it was determined utilization of municipal water is infeasible for this project. Utilization of municipal water would require additional ground disturbance for needed infrastructure to refill the irrigation lake and reoccurring costs to purchase water thereafter. Additionally, golf course irrigation is a non-essential water use for municipal water providers, and during periods of drought would be restricted or unable to be utilized as an alternative water source. In coordination with the Virginia Department of Health, it was also determined the proposed surface water withdrawal has no effect on downstream municipal water systems, as the nearest public water supply intake is the City of Lynchburg's James River Albert Intake 42 miles downstream of the golf course.

4. Wetland & Stream Impacts

Commenters expressed concern that reconstruction activities were harming wetlands, altering natural stream channels, and degrading ecological function within Woods Creek and its tributaries. Commenters worried that the permitted impacts underestimate the full ecological footprint of the project. They noted tree removal, bank excavation, and proposed dredging operations across the property. Commenters expressed concern that the onsite impoundments raise water temperature, lower dissolved oxygen, obstruct movement of aquatic life, and disrupt sediment transport, all of which continue to degrade an already impaired stream. Several commenters described observing dying aquatic organisms, increased algal growth, and visibly altered stream morphology. They stated that the wetlands onsite provide important filtration and flood-mitigation benefits that should not be compromised for course aesthetics or during redesign. Commenters urged DEQ to require wetland preservation, riparian restoration, functional stream restoration, removal of "unnecessary" decorative ponds, and stronger protections within the permit to prevent future degradation.

DEQ Response

Draft VWP Permit No. 24-2886 proposes to authorize the following impacts:

- *60 sq. ft (10 linear ft) of Stream Impacts;*
- *0.09 acres of PFO Wetland Impacts;*
- *4.593 acres of Open Water Impacts;*
- *0.142 acres for dredging.*

Open water impacts are excluded from compensation under 9VAC25-210-60 6, and all other impacts have been minimized and avoided to the greatest extent possible. The remaining impacts fall below the threshold for general VWP permitting requirements in nontidal waters, as described in 9VAC25-210-180 E 7 d. Surface water utilized for golf course irrigation shall only be withdrawn from the onsite Irrigation Lake and Hole 17 Impoundment. The draft permit includes new downstream release requirements maintaining and does not authorize any additional impacts to surface waterbodies beyond what is proposed. Any impacts or disturbance to uplands not authorized by draft VWP Permit No. 24-2886 may require other local, state, or federal permits or approvals and are not regulated by the VWP regulations.

5. Groundwater Impacts and Well Protection

Commenters, particularly residents living near the course who rely on private drinking wells, expressed concerns regarding contamination of groundwater at and around Lexington Golf & Country Club. Commenters referenced lab results indicating contamination in the golf course wells (PFAS, lead, and chromium) and emphasized that karst geology enables rapid and unpredictable movement of groundwater. This could create higher risk of contaminants affecting nearby residential wells, springs, or waterbodies. Several commenters reported that their own wells have shown contamination results matching those found at the golf course, suggesting a shared aquifer connection. Commenters stated groundwater withdrawals for irrigation could lower the water table or reduce baseflow contributions to Woods Creek, worsening drought-period flows. Many requested detailed hydrogeologic studies, including dye tracing, aquifer testing, expanded groundwater monitoring, and comprehensive mapping of well and spring connections. Concern was expressed that groundwater contamination could persist and threaten drinking water quality, public health, water availability, and ecological integrity.

DEQ Response

Part I-Special Conditions E 2 c & E 6 e iii require the facility to record groundwater withdrawal volumes used to supply supplemental water to the irrigation pond to be included in semi-annual reports submitted to the Department. Additionally, Special Conditions Part I E 3 requires the installation of a metering device on the irrigation well within 180 days of permit issuance to record this water usage.

The onsite irrigation well was sampled and tested on July 8,2025, in accordance with EPA preparation method 3010A and analytic method 6010D. This sampling indicated a lead concentration of 61.4 ug/L. Believing this concentration was influenced by the age and materials of the well infrastructure and that the well had not been used or purged, the Applicant conducted additional sampling on April 6, 2026, using Analytical & Preparation Method EPA 200.8; results indicated a lead concentration of 5.1 ug/L. Part I-Special Condition D 9 has been added to the permit requiring additional lead sampling prior to use of the Irrigation Well. The Applicant is required to complete a minimum of three additional tests to measure lead concentrations in groundwater from the well. Test results are to be provided to DEQ for review and approval prior to use of the well for supplemental irrigation

purposes. Additionally, the Applicant must provide lead sampling results to the Department on each semi-annual report for the initial three years of the permit term. The well that had measured PFAS levels of concern has been fully decommissioned in accordance with Virginia Department of Health (VDH) procedures; the Applicant provided proof of abandonment to DEQ on April 16, 2026.

6. Permit Process, Data Quality, and Compliance

Commenters expressed concern regarding the reliability and adequacy of the information provided by the Applicant and used to develop the draft permit. Commenters referenced incomplete or inconsistent historic water withdrawal records, including years when data was missing or self-reported totals appear inaccurate. Some commenters were displeased the permit was being drafted while large portions of golf course renovation were already underway, leaving the impression that activities might be outpacing regulatory review. Many commenters expressed displeasure with enforcement actions from regulatory agencies citing repeated sediment violations, unclear accountability, and insufficient consequences for environmental harm. Additionally, commenters claimed that the use of Kerrs Creek rather than Woods Creek data indicates a flawed analytical foundation and that the permit as written lacks robust monitoring requirements, real-time flow measurement, or enforceable triggers for protective actions. Commenters requested revisions to the draft permit including reduced withdrawal limits, increased riparian buffer requirements, and new hydrologic modeling utilizing data within the Woods Creek watershed. Additionally, commenters requested another public hearing prior to comment response, required third-party monitoring, more frequent reporting periods, stronger penalties for violations, and monitoring results posted publicly online.

DEQ Response

All VWP Individual Permits are developed consistent with requirements set forth in 9VAC25-210 et seq and associated Department policies and procedures to ensure that authorized surface water withdrawals ensure protection of all beneficial uses. It is the responsibility of the Applicant to adhere to all permit conditions and provide accurately reported data to the Department for each reporting period. Draft VWP Permit No. 24-2886 requires semi-annual reporting for Department compliance review with authorized activities, withdrawal volume limitations, and all other applicable conditions.

Based on public input and additional DEQ analysis, the Department has reduced the annual withdrawal limitations from the initial draft permit by 3.0 Mgal/year under normal operating conditions and 5.0 Mgal/year during the establishment period. The daily and monthly limits have not been changed; the annual withdrawals have been reduced to reflect improved irrigation practices and concerns expressed by commenters. Additional monitoring and reporting requirements were included within Part I-Special Condition E 7 requiring additional sampling prior to use of the Irrigation Well. The Applicant is required to develop a Water Quality Monitoring Plan, including three initial tests to measure lead concentrations in groundwater from the well. The monitoring plan and test results are to be provided to the

Department for review and approval prior to use of the well for supplemental irrigation purposes. Additionally, the Applicant must provide sampling results to the Department on each semi-annual report for the initial three years of the permit term. Lastly, as noted above in response #3, Special Condition Part I D 8 of the revised permit requires removal of the diversion from the northern unnamed tributary on the golf course property within 90 days of permit issuance.

Please see response #3 for information on modeling and analysis conducted during the development of Draft VWP Permit No. 24-2886. The development of the draft permit, including the procedures for accepting public comments and processing controversial permit actions, have followed all requirements of the VWP program regulations in Part III of 9VAC25-210.

7. Environmental Justice Concerns

Several commenters raised environmental justice concerns, asserting that the permit as currently written could disproportionately impact low-income communities, historically black neighborhoods, and households relying on private wells downstream, specifically citing the Newtown community. Commenters asserted DEQ did not conduct a required environmental justice review and noted that the Woods Creek watershed contains multiple existing water quality impairments, elevating the risk of disproportionate harm. One commenter emphasized that many downstream residents depend on groundwater wells that are more vulnerable to contamination, while the golf course benefits a relatively small user base. Commenters also highlighted the need for meaningful public engagement tailored to affected communities and requested that DEQ perform a full Environmental Justice Act compliance analysis before issuing any permit.

DEQ Response

The Department utilized EJScreen+ to conduct an environmental justice analysis on the project location. Based on the available data, the project is not located within a low-income community census block group nor a community of color census tract, therefore is not within an environmental justice community and not subject to the 2020 Environmental Justice Act. The draft permit includes protections to all downstream beneficial uses and communities, including minimum instream flow requirements which maintain or increase flows to communities downstream from the golf course. Regarding groundwater contamination, please refer to the response to Category Five where the Department addresses concerns regarding groundwater impacts and well protection.

The Department followed all required public engagement procedures; additionally, the Department expanded the Public Hearing Comment Period from 45-days to 51-days to further facilitate public involvement.

8. Requests for Use of Alternative Water Sources

Many commenters asserted the golf course should rely on municipal water or other alternatives rather than withdrawing from Woods Creek, given the creek's impaired status, low-flow during summer months, and ecological importance to the community. Several commenters noted that municipal water service is available onsite and that the club, as a private enterprise, should purchase water rather than use a public natural resource. Some

suggested Buffalo Creek as an alternative place for the surface water intake, while others proposed reducing irrigated acreage, planting drought-tolerant turfgrass, or adopting lower-water-use course designs common in arid regions. Commenters emphasized that shifting to public water or reducing water demand would alleviate pressure on Woods Creek, avoid ecological degradation, and prevent contamination spread through irrigation of polluted groundwater. Many stated that the club's financial resources make such alternatives feasible and more equitable.

DEQ Response

In accordance with 9VAC25-210-360, the Applicant conducted an alternative analysis for the proposed surface water withdrawal. As a part of the application process, the Department conducted a review of this alternative analysis to ensure the proposed withdrawal was the least damaging practical option. The construction of new intakes and transmission lines was deemed to be impractical fiscally and would lead to associated construction impacts. Additionally, see the response to #3 above regarding the use of the public water supply as an alternate source water.

9. Support for Permit Issuance

Commenters stated the Draft VWP Permit No. 24-2886 adequately protects the utilized resources; support was expressed for the continuation and completion of the Lexington Golf & Country Club project.

DEQ Response

DEQ acknowledges the comments received.