



**US Army Corps  
of Engineers** ®  
Wilmington District

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**PHILPOTT LAKE, VIRGINIA  
WATER STORAGE REALLOCATION  
INTEGRATED FEASIBILITY STUDY AND ENVIRONMENTAL ASSESSMENT**



**APPENDIX G: PUBLIC AND AGENCY COMMENTS WITH CORPS  
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**Final Report  
February 2023**

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## Federal Agencies

### US Environmental Protection Agency (EPA)

#### USEPA Comment 1:

EPA appreciates the opportunity to review and comment on the Philpott Lake Water Storage Reallocation Feasibility Study and EA. EPA understand the project purpose to reallocate a small portion of water from conservation storage at Philpott Lake to be used as municipal and industrial water supply. EPA does not have any comments regarding the proposed study. Should changes occur to the alternatives or the project altered in a way that includes impacts to natural resources or human health and the environment we would appreciate the opportunity to review that new information.

#### *US Army Corps of Engineers Response:*

*Noted. Thank you very much for your review.*

### U.S. Department of Energy-Southeastern Power Administration

#### USDoE-Southeastern Power Administration

#### Comment 1:

This study proposes to furnish flows of 6.19 cubic-feet per second (CFS) from the plant's station service unit to provide Henry County Public Service Authority 4 million gallons per day. While this at first does not seem to be a noticeable impact – the station service unit produces flows much higher than 6 cfs during operations. It does set the precedent that the unit will have to run continuously, unless the main units are in operation, to meet the downstream requirement. Cumulative future withdrawal requests will eventually exceed the flow capability of the station service unit. Southeastern cautions the Corps in setting the precedent that this withdrawal request has no significant impact.

#### *US Army Corps of Engineers Response:*

*Due to O&M considerations, the station service unit at Philpott has actually been operating in a continuous mode since 2009. Increasing the output to release this relatively small additional amount of water will not be an operational issue and will not exceed the capacity of the station service unit.*

## **State Agencies**

### **Virginia Department of Environmental Quality (DEQ) Blue Ridge Regional Office (BRRO)**

VA DEQ BRRO Comment 1:

The DEQ BRRO has no comments based on the limited environmental impacts.

*US Army Corps of Engineers Response:*

*Noted. Thank you very much for your review.*

### **VA DEQ Air Division**

VA DEQ Air Division Comment 1:

The project site is located in an ozone attainment area.

*US Army Corps of Engineers Response:*

*Noted. Thank you very much for your review.*

## **Virginia Department of Conservation and Recreation's (DCR) Division of Natural Heritage (DNH)**

### VA DCR DNH Comment 1:

- Based on the information provided in the draft EA, DCR does not anticipate adverse impact to documented natural heritage resources due to minimal water level/downstream flow changes and no water quality impacts from the proposed project.
- Predictive models identifying potential habitat for natural heritage resources also intersect the project boundary. However, based on DCR biologist's review of the proposed project a survey is not recommended for the resources.
- There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.
- The current activity will not affect any documented state-listed plants or insects.

### *US Army Corps of Engineers Response:*

*Noted. Thank you very much for your review.*

### VA DCR DNH Comment 2:

Contact the DCR DNH and resubmit project information if the scope of the project changes and/or six months has passed before it is utilized.

### *US Army Corps of Engineers Response:*

*The USACE will contact the DCR DNH and resubmit project information if the scope of the project changes and/or six months has passed before it is utilized.*

## **Virginia Department of Environmental Quality (DEQ) Floodplain Management**

VA DEQ Floodplain Management Comment 1:

As applicable, all development as shown on the locality's Flood Insurance Rate Map (FIRM) must be permitted and comply with the requirements of the local floodplain ordinance.

*US Army Corps of Engineers Response:*

*Concur, all development as shown on the locality's Flood Insurance Rate Map will be permitted and comply with the requirements of the local floodplain ordinance.*

VA DEQ Floodplain Management Comment 2:

Projects conducted by federal agencies within the SFHA must comply with federal Executive Order 11988: Floodplain Management.

*US Army Corps of Engineers Response:*

*This project complies with federal Executive Order 11988: Floodplain Management.*

## **Virginia Department of Health (VDH) Office of Drinking Water (ODW)**

### VDH ODW Comment 1:

Implement best management practices, including erosion and sedimentation controls as well as spill prevention controls and countermeasures, on the project site.

### *US Army Corps of Engineers Response:*

*Concur, best management practices, including erosion and sedimentation controls as well as spill prevention controls and countermeasures, will be implemented on the project site.*

### VDH ODW Comment 2:

Materials should be managed while on site and during transport to prevent impacts to nearby surface water.

### *US Army Corps of Engineers Response:*

*Concur, materials will be managed while on site and during transport to prevent impacts to nearby surface water.*

### VDH ODW Comment 3:

Well(s) within a 1,000-foot radius from the project site should be field marked and protected from accidental damage during construction.

### *US Army Corps of Engineers Response:*

*Concur, well(s) within a 1,000-foot radius from the project site will be field marked and protected from accidental damage during construction.*

#### VA DEQ Comment 1:

We have several pollution prevention recommendations that may be helpful for future projects:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the the facility is committed to complying with environmental regulations, reducing risk, minimizing environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program (VEEP). VEEP provides recognition, annual permit fee discounts, and the possibility for alternative compliance methods.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for building construction and design.
- Integrate pollution prevention techniques into the facility maintenance and operation, to include inventory control for centralized storage of hazardous materials. Maintenance facilities should have sufficient and suitable space to allow for effective inventory control and preventive maintenance.

*US Army Corps of Engineers Response:*

*Thank you very much for the recommendations and your review.*

#### **Virginia Department of Transportation**

VADOT Comment 1:

VADOT has reviewed the information provided in your Philpott Water Storage Reallocation Feasibility Study and has no additional comments.

*US Army Corps of Engineers Response:*

*Noted. Thank you very much for your review.*

#### **Virginia Department of Wildlife Resources**



VADWR Comment 1:

We have reviewed the Draft, Philpott Lake, Virginia, Water Storage Reallocation Feasibility Study and Environmental Assessment, dated July 2022 and are generally supportive of its findings. The Smith River, on which this impoundment lies, is designated a Threatened and Endangered Species Water as it is known to support state Threatened Orangefin Madtoms and Species of Greatest Conservation Need (SGCN) Tier Ia Roanoke Bass. As far as we can tell, this proposal to store water for use by Henry County is not likely to result in adverse impacts upon these species.

*US Army Corps of Engineers Response:*

*Concur. Thank you very much for your review.*