
From: Rolband, Michael (DEQ) <Michael.Rolband@deq.virginia.gov>
Sent: Thursday, July 24, 2025 2:02 PM
To: Shannon Varner; Bobby Proutt; Craig Toalson; Andrew Clark; Craig Toalson; Abraham, Phil; Martha Marks; Sara Johnson; Mr. TJ Mascia (tj.mascia@davey.com)
Cc: Rak, Jonathan (DEQ)
Subject: ILF Public Comment - negative from NEBA
Attachments: Public Comment-WSRF In-Lieu Fee Prospectus_072025.pdf
Importance: High

FYI -

So far, we have only seen the attached public comment from NEBA opposing the DEQ proposed ILF.

It is the opposite of what we had heard so far from the Banking community - as it can only be used if there are no bank credits or VARTF (ruin by TNC) ILF credits available. DEQ then aggregates the sales for up to two years per watershed and will either put out an RFP for credits or a turnkey Design/Permit/Build/Monitor and maintain contract if no credits are available.

This is being undertaken per HB1628 (2023) and subsequent funding in our FY2025 budget.

Comments on this Project must be in writing and can be sent by email to [CENAO REG MitigationTeam@usace.army.mil](mailto:CENAO_REG_MitigationTeam@usace.army.mil), or to the following link <https://rrs.usace.army.mil/rrs/public-notice> or by regular mail, addressed to the Norfolk District, Corps of Engineers (ATTN: CENAO-WRR), 803 Front Street, Norfolk, VA 23510-1011, and must be **received by the close of business on July 28, 2025.**

Mike



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Director

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