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**From:** Sara L. Johnson <[sjohnson@nossaman.com](mailto:sjohnson@nossaman.com)>  
**Sent:** Thursday, July 24, 2025 2:28 PM  
**To:** Rolband, Michael (DEQ)  
**Cc:** Rak, Jonathan (DEQ)  
**Subject:** RE: ILF Public Comment - negative from NEBA

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Absolutely! Well-functioning state run ILFs have proven to be a productive partner for bankers and the resources they restore. I expect we will be able to assist... more to come!

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**From:** Rolband, Michael (DEQ) <[Michael.Rolband@deq.virginia.gov](mailto:Michael.Rolband@deq.virginia.gov)>  
**Sent:** Thursday, July 24, 2025 12:26 PM  
**To:** Sara L. Johnson <[sjohnson@nossaman.com](mailto:sjohnson@nossaman.com)>  
**Cc:** Rak, Jonathan (DEQ) <[jonathan.rak@deq.virginia.gov](mailto:jonathan.rak@deq.virginia.gov)>  
**Subject:** [External] Re: ILF Public Comment - negative from NEBA

Please if at all possible - help us.

as far as I know VERA is supporting, just not yet in writing - this will not compete with banks - it will give bankers more options to restore wetlands. 😊

Mike



**Michael S. Rolband, PE, PWD, PWS Emeritus**  
Director

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**From:** Sara L. Johnson <[sjohnson@nossaman.com](mailto:sjohnson@nossaman.com)>  
**Sent:** Thursday, July 24, 2025 3:24 PM  
**To:** Rolband, Michael (DEQ) <[Michael.Rolband@deq.virginia.gov](mailto:Michael.Rolband@deq.virginia.gov)>  
**Cc:** Rak, Jonathan (DEQ) <[jonathan.rak@deq.virginia.gov](mailto:jonathan.rak@deq.virginia.gov)>  
**Subject:** RE: ILF Public Comment - negative from NEBA

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Mike, thank you for alerting us to NEBA's letter. ERBA was deferring to VERA's comments on the DEQ ILF but I am elevating to ERBA leadership to see if there is support for us submitting comments as well, which would hopefully balance out NEBA's comment on the public record. I will be in touch asap.

Thank you, Sara

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**From:** Rolband, Michael (DEQ) <[Michael.Rolband@deq.virginia.gov](mailto:Michael.Rolband@deq.virginia.gov)>

**Sent:** Thursday, July 24, 2025 12:02 PM

**To:** Shannon Varner <[shannon.varner@troutman.com](mailto:shannon.varner@troutman.com)>; Bobby Proutt <[bproutt@clearwaterventuresllc.com](mailto:bproutt@clearwaterventuresllc.com)>; Craig Toalson <[ctoalson@hbav.com](mailto:ctoalson@hbav.com)>; Andrew Clark <[aclark@hbav.com](mailto:aclark@hbav.com)>; Craig Toalson <[ctoalson@hbav.com](mailto:ctoalson@hbav.com)>; Abraham, Phil <[pabraham@vectrecorp.com](mailto:pabraham@vectrecorp.com)>; Martha Marks <[mmarks@naiopva.org](mailto:mmarks@naiopva.org)>; Sara L. Johnson <[sjohnson@nossaman.com](mailto:sjohnson@nossaman.com)>; Mr. TJ Mascia ([tj.mascia@davey.com](mailto:tj.mascia@davey.com)) <[tj.mascia@davey.com](mailto:tj.mascia@davey.com)>

**Cc:** Rak, Jonathan (DEQ) <[Jonathan.Rak@deq.virginia.gov](mailto:Jonathan.Rak@deq.virginia.gov)>

**Subject:** [External] ILF Public Comment - negative from NEBA

**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-notices> 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



**Michael S. Rolband, PE, PWD, PWS Emeritus**  
Director

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