
From: Phil Abraham <pabraham@vectrecorp.com>
Sent: Thursday, July 24, 2025 7:29 PM
To: Michael Rolband
Cc: Bobby Proutt; Martha Marks; Jonathan Rak; Sarah Thomas
Subject: Re: ILF Public Comment - negative from NEBA
Attachments: Outlook-cwx5mule.png; Public Comment-WSRF In-Lieu Fee Prospectus_072025.pdf

CAUTION: This Email originated from OUTSIDE of the COV. Do not open attachments or click links unless this email comes from a known sender and you know the content is safe..

Mike: Sarah and I will get comments from VACRE in support of your proposals by the deadline. We are working with Bobby and Martha on this. Thanks, Phil

Philip F. Abraham
Director and General Counsel
The Vectre Corporation
919 East Main Street
Suite 1550
Richmond, VA 23219
Tel. 804-644-6600
Email pabraham@vectrecorp.com

Please Excuse Any Typos
Sent from my iPhone

On Jul 24, 2025, at 3:02 PM, Rolband, Michael (DEQ) <Michael.Rolband@deq.virginia.gov> wrote:

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, 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
[Virginia Department of Environmental Quality](#)
1111 East Main St., Suite 1400
Richmond, VA 23219
Phone: (804) 698-4020, Cell: (804) 659-1734