
From: Rolband, Michael (DEQ) <Michael.Rolband@deq.virginia.gov>
Sent: Tuesday, July 29, 2025 4:45 AM
To: Sarah Thomas
Cc: Rak, Jonathan (DEQ)
Subject: Re: ILF Public Comment - negative from NEBA

Good morning Sarah

When you have a chance, could you send Jonathan and myself a copy of your comments in a separate clean email?

Thanks

Mike

Mike Rolband, PE, PWD, PWS Emeritus
Director
[Virginia Department of Environmental Quality](#)
1111 East Main St., Suite 1400
Richmond, VA 23219
Phone: (804) 698-4020

From: Rolband, Michael (DEQ) <Michael.Rolband@deq.virginia.gov>
Sent: Monday, July 28, 2025 5:22:15 PM
To: Sarah Thomas <sthomas@vectrecorp.com>; Abraham, Phil <pabraham@vectrecorp.com>
Cc: Bobby Proutt <bproutt@clearwaterventuresllc.com>; Martha Marks <mmarks@naiopva.org>; Rak, Jonathan (DEQ) <Jonathan.Rak@deq.virginia.gov>
Subject: Re: ILF Public Comment - negative from NEBA

Wonderful! Thank you so much!

Mike Rolband
Director, DEQ

From: Sarah Thomas <sthomas@vectrecorp.com>
Sent: Monday, July 28, 2025 4:40 PM
To: Rolband, Michael (DEQ) <Michael.Rolband@deq.virginia.gov>; Abraham, Phil <pabraham@vectrecorp.com>
Cc: Bobby Proutt <bproutt@clearwaterventuresllc.com>; Martha Marks <mmarks@naiopva.org>; Rak, Jonathan (DEQ) <Jonathan.Rak@deq.virginia.gov>
Subject: Re: ILF Public Comment - negative from NEBA

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I just submitted our VACRE letter of support. We are also collaborating with HBAV on a broad industry coalition letter that will be submitted in the next few minutes. Thanks, SLT

Sarah L. Thomas
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From: Rolband, Michael (DEQ) <Michael.Rolband@deq.virginia.gov>
Date: Thursday, July 24, 2025 at 9:02 PM
To: Phil Abraham <pabraham@vectrecorp.com>
Cc: Bobby Proutt <bproutt@clearwaterventuresllc.com>, Martha Marks <mmarks@naiopva.org>, Rak, Jonathan (DEQ) <Jonathan.Rak@deq.virginia.gov>, Sarah Thomas <sthomas@vectrecorp.com>
Subject: Re: ILF Public Comment - negative from NEBA

Awesome - thanks

Mike Rolband, PE, PWD, PWS Emeritus
Director
[Virginia Department of Environmental Quality](http://www.virginia.gov/EnvironmentalQuality)
1111 East Main St., Suite 1400
Richmond, VA 23219
Phone: (804) 698-4020

From: Phil Abraham <pabraham@vectrecorp.com>
Sent: Thursday, July 24, 2025 8:28:38 PM
To: Rolband, Michael (DEQ) <Michael.Rolband@deq.virginia.gov>
Cc: Bobby Proutt <bproutt@clearwaterventuresllc.com>; Martha Marks <mmarks@naiopva.org>; Rak, Jonathan (DEQ) <Jonathan.Rak@deq.virginia.gov>; Sarah Thomas <sthomas@vectrecorp.com>
Subject: Re: ILF Public Comment - negative from NEBA

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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
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919 East Main Street
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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](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

[Virginia Department of Environmental Quality](#)

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