

V. Additional Resources Request

The proposed amendments will increase the staff time and resources needed for local governments to implement the CBPA program. The technical resources provided by DEQ will also need to be updated.

Recommendation

To best support program modifications, we respectfully request for DEQ to prioritize updates of the Buffer Manual and model local ordinance so that they reflect the regulatory changes. Additionally, local governments request technical assistance and training for implementation of the new provisions. The most pressing topics to address will be: 1) how to review the impacts of climate change on a project and 2) how to review the impacts of an adaptation measure on water quality.

In conclusion, by documenting our extensive concerns with the proposed regulatory amendments to the CBPA regulations, we request for DEQ and the State Water Control Board to support our recommendation to slow down this process and work through these changes in the traditional way, using a regulatory advisory panel. The Hampton Roads Planning District Commission appreciates your consideration of these comments and suggestions.

Sincerely,

Andria P. McClellan
Council, City of Norfolk
Chair, Hampton Roads Planning District Commission