

MEMBER
JURISDICTIONS

November 17, 2022

CHESAPEAKE

Mr. Matt Dalon
Resilience Planning Program Manager
Virginia Department of Conservation and Recreation
600 East Main Street, 4th Floor
Richmond, VA 23219

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Flood.Resilience@dcr.virginia.gov

HAMPTON

RE: Public Comments – Virginia Coastal Resilience Master Planning Framework

ISLE OF WIGHT

Dear Mr. Dalon:

JAMES CITY

On behalf of the Hampton Roads Planning District Commission’s board and seventeen member jurisdictions, I write to you to provide these comments on the Virginia Coastal Resilience Master Planning Framework (Framework), dated October 22, 2020.

NEWPORT NEWS

NORFOLK

Enhancing coastal resilience is a pressing issue for many communities in Hampton Roads. Hampton Roads is both the most vulnerable region in the Commonwealth to flooding and sea level rise and a key part of Virginia’s economy, home to the Port of Virginia, numerous military and other federal installations, a major tourism industry, and other major commercial and industrial activities. Developing an effective statewide framework to integrate local, regional, state, and federal adaptation policies and practices is critical to ensuring the future of Hampton Roads.

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Framework Principles

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Principle 1: Acknowledge climate change and its consequences, and base decision-making on the best available science.

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The HRPDC agrees that the Commonwealth’s planning framework should be based on the best available science. As climate science is constantly evolving, it is critical that the science that the Commonwealth uses evolve with it. Specifically, the Commonwealth should incorporate the findings from NOAA’s 2022 Sea Level Rise Technical Report, “Global and Regional Sea Level Rise Scenarios for the United States,” instead of continuing to rely on the 2017 version.

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Principle 3: Recognize the importance of protecting and enhancing green infrastructure like natural coastal barriers and fish and wildlife habitats by prioritizing nature-based solutions.

The HRPDC agrees that protecting our natural resources from the impacts of climate change is important for economic, environmental, and quality of life purposes. However, the HRPDC is concerned that the protective or resilience benefits of green infrastructure have not been demonstrated. Therefore, the HRPDC recommends that the protection of natural resources and the use of green infrastructure for protecting communities be considered separately.

Principle 4: Utilize community and regional scale planning to the maximum extent possible, seeking region-specific approaches tailored to the needs of individual communities.

The HRPDC supports a Commonwealth-wide approach that encourages local and regional planning and coordination. Adaptation will typically occur at the community level, so building capacity for local planning and implementation is critical. The Commonwealth's plan should aggregate local and regional initiatives through a bottom-up approach.

Principle 5: Understand fiscal realities and focus on the most cost-effective solutions for the protection and adaptation of our communities, businesses, and critical infrastructure.

The HRPDC agrees that all adaptation strategies – protection, accommodation, and relocation – will need to be considered as part of the Commonwealth's resilience planning process. However, a cost-effective approach needs to consider the overall effectiveness and performance of various strategies in addition to the cost. While natural approaches may be less costly than structural or hybrid approaches, in many cases they will also provide less protection. The Commonwealth's framework should emphasize the importance of identifying strategies that will work without prematurely prioritizing natural and nature-based approaches. In addition, the HRPDC supports a process that enables and encourages community-based planning to inform the selection of adaptation strategies instead of a top-down approach that emphasizes relocation.

Framework Goals

Goal 1: Identification of priority projects to increase the resilience of coastal communities, including both built and natural assets at risk due to sea level rise and flooding.

The HRPDC recognizes that many communities have not had the time or capacity to conduct the level of research, analysis, and planning that would inform the identification and development of resilience projects. Also, creating a statewide prioritized list without a dedicated source of funding is premature. The Commonwealth's framework should focus on supporting communities in this work before attempting to prioritize projects at the statewide level.

Goal 2: Establishment of a financing strategy, informed by regional differences and equity considerations, to support the execution of the plan.

Although financing will be an important part of implementing local, regional, and Commonwealth resilience initiatives, the HRPDC believes that funding is equally if not more important. Developing and maintaining sustainable sources of revenue to fund planning and project construction is critical and should be incorporated into the Framework. The Community Flood Preparedness Fund (CFPF) is one such source of funding, and the Commonwealth should consider changes to the CFPF to increase its effectiveness.

Goal 3: Effective incorporation of climate change projections into all of the Commonwealth's programs addressing coastal zone built and natural infrastructure at risk due to sea level rise and flooding.

The HRPDC supports incorporating climate change projections into the Commonwealth's regulatory and infrastructure programs. These projections should be regularly reconsidered and updated to reflect the best available science. As described above, this should include updating the Commonwealth's sea level rise planning standards to reflect new projections from NOAA in addition to future precipitation projections.

The HRPDC supports ensuring that state activities comply with National Flood Insurance Program minimum requirements and standards.

Goal 4: Coordination of all state, federal, regional, and local coastal adaptation and protection efforts in accordance with the guiding principles of this Framework.

Coordination of local, regional, state, and federal efforts will require a clear process for integrating those efforts and will also require investing in a local and regional capacity. The Framework should emphasize the need for coordination between state agencies, including the Department of Conservation and Recreation, the Department of Environmental Quality, the Department of Transportation, and the Department of Housing and Community Development, which has not been adequate on this matter and should be improved. State agencies should also increase their coordination with planning district commissions, metropolitan planning organizations, and localities.

We appreciate the opportunity to provide comments on the Framework. We encourage the Administration to continue engaging with planning district commissions and local governments as stakeholders. We would welcome the opportunity to discuss these comments further.

Sincerely,

Andria P. McClellan
Chair

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HAMPTON

RE: Public Comments – Virginia Coastal Resilience Master Plan – Phase I

ISLE OF WIGHT

Dear Mr. Dalon:

JAMES CITY

On behalf of the Hampton Roads Planning District Commission’s board and seventeen member jurisdictions, I write to you to provide these comments on the Virginia Coastal Resilience Master Plan (Phase I), dated December 7, 2021.

NEWPORT NEWS

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The HRPDC appreciates the effort and resources the Northam Administration put into the creation of the Master Plan. Developing an effective plan for addressing the current challenges of recurrent flooding and the future challenges of sea level rise is a critical need for the Commonwealth and Hampton Roads in particular. We appreciate the leadership of the Department of Conservation and Recreation in developing this plan, and we look forward to working with the Commonwealth on implementing resilience practices and projects.

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Support for Local and Regional Plans

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Given that most adaptation strategies will be implemented at the locality level, the HRPDC recommends that the Phase I Plan better reflect the principles and goals of the Coastal Resilience Master Planning Framework by supporting and building on local and regional planning efforts. This would be similar to the Commonwealth’s planning approaches for water supplies and transportation, where localities participate in a coordinated process to develop regional plans that are aggregated to form a state-wide plan. In addition, many communities are already developing or have adopted resilience plans, such as the Norfolk Coastal Storm Risk Management Study and Virginia Beach’s Flood Protection Program. The Coastal Resilience Master Plan should incorporate these locally adopted plans by reference.

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Guidance and Tools for Local Governments

The HRPDC appreciates the level of technical work completed as part of the Coastal Resilience Master Plan. The HRPDC supports state-led research and analysis efforts that directly support local and regional planning and decision-making. We recommend that the Department of Conservation and Recreation coordinate with local governments and planning district commissions to identify the datasets, analyses, and other technical products that would be of the most practical use to localities and that will empower them to make more informed decisions. Specific examples of such products include resilience project concepts and designs, floodplain maps, and design storms.

Process for Updating and Implementing the Plan

The HRPDC supports developing a process to regularly consider updates or amendments to the Coastal Resilience Master Plan. As local governments complete their planning efforts and develop projects, it will be necessary to have a mechanism for adding those projects and other outcomes to the Master Plan more frequently than once every five years.

We appreciate the opportunity to provide comments on the Coastal Resilience Master Plan (Phase I). We encourage the Administration to continue engaging with planning district commissions and local governments as stakeholders. We would welcome the opportunity to discuss these comments further.

Sincerely,

Andria P. McClellan
Chair