

VIRGINIA BEACH  
**VISION**

January 14, 2022

The Honorable Robert M. (Bobby) Dyer  
Mayor  
The Honorable City Council  
City of Virginia Beach

Dear Mayor Dyer and members of City Council:

Virginia Beach Vision well appreciates the difficult decisions that lie before us in addressing stormwater flooding and sea level rise and commends City Council on advancing financing through the bond referendum.

In City Council's discussion at the January 4<sup>th</sup> meeting, Councilmembers specifically asked for suggestions from the development community to improve the proposed amendment to the Comprehensive Plan. Given the complexities of the issue, we do not feel it possible to comply with that request prior to Council's scheduled reconsideration of the amendment at the February 1 meeting.

Council should defer action on amending the Comprehensive Plan for sufficient time to allow:

- the continued review of the regulations with the stakeholders, issue experts and city staff;
- their work to be vetted by the Planning Commission, the Process Improvement Steering Committee, and the Development Authority;
- revisions to the stormwater regulations to be completed prior to amending the overarching Comprehensive Plan; and,
- time to ensure we address flood mitigation without creating unintended consequences that could impact the city's economic growth and stability.

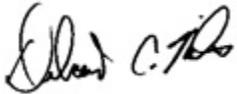
The amendment to the Comprehensive Plan document and its impact is closely related to changes being made to the stormwater regulations. That, as it must be, is a work in progress with amendments proposed to nearly three-quarters of the document containing granular detail. Decisions on the regulations should be completed and forwarded to the Planning Commission and approved by Council before changes to the Comprehensive Plan are finalized.

It is important to fully vet the many elements of the changes as they will have broad implications. What will be their impact on future economic development projects? What will be the impact on needed redevelopment? Is it wise to apply the same standards city wide or should the Southern Watershed and its unique environment be held to a higher standard?

Much of the city's future development will be the redevelopment of existing properties. While well intended, the proposed regulations may impede such redevelopment and prevent flood mitigation to older properties that were not subject to stormwater regulation when first developed.

Addressing the challenges of stormwater flooding and anticipated sea level rise is complex and multi-faceted. The necessary time should be given to make informed, well-reasoned decisions including time for public engagement and education. The existing Comprehensive Plan has already passed its mandated deadline for review and revision. Changes to the Plan should be made as a part of that comprehensive review process to ensure its sufficiency and effectiveness.

Respectfully submitted,



Delceno C. Miles  
President



Martha S. McClees  
Executive Director

Cc: Bobby Tajan, Director of Planning, City of Virginia Beach  
Patrick Duhaney, City Manager  
Taylor Adams, Deputy City Manager  
bc: Virginia Beach Vision Board of Directors