

VIRGINIA BEACH  
**VISION**

December 20, 2021

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

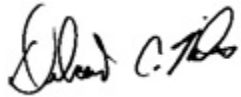
Dear Mayor Dyer and members of City Council:

With City Council's deferral of action on the Resolution to Adopt and Amend into the Virginia Beach Comprehensive Plan 2016 Impacts for Discretionary Land Use Applications, Virginia Beach Vision continues to be concerned that the proposed language and concurrent application will have detrimental and perhaps unintended consequences on future business growth and development in the City of Virginia Beach. Our specific concerns are enumerated below.

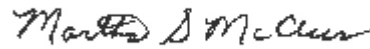
- The proposed amendment when applied by city staff will potentially stifle any kind of development or redevelopment.
- The permitting approval process for both entitlements and final design will be lengthened, resulting in significant new costs for a project to move forward. Significant increases in the construction costs for stormwater measures would also be higher for the city's developments.
- The additional cost associated with providing a stormwater management study has been moved to the front of the approval process making it a part of the entitlement phase, increasing the financial risk to property owners. Such costs were previously part of the site plan permitting phase.
- Imposing a 0.00 tolerance for runoff allows for no negotiation or mitigation even for the most minor impacts. Imposing the new requirement that the Planning Department automatically deny applications that do not conform to the net-zero standard, takes away any form of discretion that might otherwise be exercised by City staff. Using a "denial" as a starting point, does not promote a business-friendly atmosphere in our city, and it leaves less room for our City staff and policy makers to exercise their judgment on an application-by-application basis.
- In consultation with the Coastal Virginia Building Industry Association and with members of the stakeholders group cited by city council, it is apparent that there is not support or consensus on the proposed amendment to the Comp. Plan.
- The voters did not approve the proposed amendment through adoption of the referendum in November. The ballot language does not include the proposed amendment or any reference to it.
- A change, such as is being proposed to the permitting approval process, has significant implications, and should be fully vetted by the stakeholders. There is no justification for expediting the adoption of an amendment to the 2016 Comp. Plan. Projects to be financed through the bond referendum are months away from implementation and the existing stormwater regulations are sufficiently stringent to protect against significant impacts in the meantime.

Given the implications associated with amending the 2016 Comprehensive Plan to include the resolution's proposed language as currently drafted, we risk positioning the city as a non-competitive place to build or grow business. This is contrary to Council's desire to be the "City of Yes," and should not be done without a careful and considered vetting of the issue and its implications.

Respectfully submitted,



Delceno C. Miles  
President



Martha S. McClees  
Executive Director

bc: Virginia Beach Vision Board of Directors