



***Loudoun County
Envision Loudoun 2040
Comprehensive Plan -***

***Loudoun County Preservation & Conservation Coalition
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OVERVIEW

The Loudoun County Preservation and Conservation Coalition (LCPCC) was organized in 2007. The Coalition now consists of 40 non-profit, non-partisan organizations representing over 4,000 citizens from ALL districts in Loudoun County, dedicated to the preservation and enhancement of Loudoun County's environmental and heritage assets.

In 2016 the Loudoun County Preservation and Conservation Coalition (LCPCC) set up a New Comprehensive Plan Review Committee to follow, analyze, and comment on the Envision Loudoun process. The committee consists of a TEAM of 15 representatives from the LCPCC member organizations with a wide range of expertise. This committee has reported to the full Coalition at their regular monthly meetings.

The May 7, 2018 draft Loudoun 2040 General Plan was thoroughly reviewed by the committee with the intent to work constructively with the draft as a starting point, supporting its recommendations as fully as possible when consistent with the Coalition's shared views. This material is a response to the request from Charles Yudd, Deputy County Administrator, for citizen questions and/or comments. The format was designed to meet the requirements requested by County Staff for further consideration by the Staff and Stakeholders as they complete the draft General Plan for discussion at the Planning Commission and eventually the Board of Supervisors.

All of the comments contributed by members of the committee have been collated into the document entitled "Loudoun County Preservation & Conservation Coalition INPUT." The intention is to share this document on the website in order to obtain feedback from our Coalition members and other organizations. It does not represent the final position of the Coalition on key issues with the draft, which will be developed in the form of specific action proposals for submission at a later date.

Al Van Huyck, LCPCC Chairman



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CONTENTS

Phase I:
June 18, 2018



- General Observations
- Questions, comments and recommendations for Chapters 1 through 6 of the May 7, 2018 Envision Loudoun 2040 Draft

Phase II:
July 9, 2018



Revision of June 18, 2018 compilation to include:

- Questions, comments and recommendations for Chapter 7 of the May 7, 2018 Envision Loudoun 2040 Draft
- Transportation Chapter questions, comments and recommendations

Electronic copy available at <https://loudouncoalition.org/comp-plan/>



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GENERAL OBSERVATIONS / ITEMS FOR CONSIDERATION	
Section/Heading Policy/Strategy/ Action #	OBSERVATIONS
General Observations	The draft Plan is largely the collective opinions of the Stakeholder Committee without a strong underlying data base and factual content.
	The Plan carries forward essentially competing concepts without resolution between business and development interests and the public's expressed desire to manage and limit growth and to emphasize Green Infrastructure, parks and trails.
	Sustainability is addressed regarding land use (and energy consumption regarding building) and the green infrastructure, but there is much more to sustainability and resilience than that. There needs to be a place, or multiple places in the plan to address other sustainability and resilience issues that have to do with transportation, overall development patterns, moving toward zero-waste, assessing a wide variety of community vulnerabilities to climate change and adopting resiliency plans and policies, protecting equity and health in vulnerable populations in our communities.
	The organization of the Chapters is uneven and provides no guidance in assembling all relevant policies about a specific spatial area.
	There is no connectivity between the Chapters to form a coherent overall Plan Scenario.
	The Plan in present form does not provide sufficient or clear guidance for the Staff to review applications on a factual basis as to whether or not they agree with the General Plan,
	The Plan is insufficient to provide support for or against development proposals of concern to the public.
	The lack of a data base and metrics will make analysis of the Plan's physical implementation against a base line impossible.
	Consideration of breaking long paragraphs into two or more parts would make reading easier.
Items for Board of Supervisor Consideration	An evaluation test regarding the "actions" might be to ask oneself, "How would this proposed action actually be implemented, does a scope of work come to mind?"
	Throughout the Plan, within the "action" lists, are frequent proposed commitments for the County Government (and Taxpayers) to make "investments of tax dollars," and "create unspecified incentives" which could be cash or in-kind. The BOS may wish to examine these actions to ensure that they support the use of tax dollars for their implementation.



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Chapter 2: LAND USE					
Section/Heading Policy/Strategy/ Action #	Pg #	Plan Text / Paragraph Reference (Optional)	Not Present	QUESTION(S)	COMMENT/INPUT/RECOMMENDATION
Vision/Introduction	2-4			Shouldn't the County have an area plan prepared before committing implementation at an urban scale?	Includes reference to second Urban Policy Area on Route 7 to Route 28. This is in the heart of the built up Suburban area around it and has not considered detailed analysis of density and mix of land uses, and provision for schools, parks, and other public facilities.
	2-4			How does the plan recognize the challenges that it's faced to manage growth?	ADD reference and discussion of how the pace of growth would be managed.
Priority Areas for New Growth & Development					This material is largely a rewrite of similar brief summaries in the Introduction.
	2-5	Paragraph 1		What is the specific plan in place to tie the 3 mile stretch along Rt 7 together to be walkable or transit-oriented?	STRIKE Third UPA at Rt 7 and Rt 28 should be removed and reconsidered after the Metro-oriented areas have had a chance to mature.
	2-5	Paragraph 3		What rationale is there for the location of the villages of greater intensity in TPA?	STRIKE reference to villages should be removed.
Place Types	2-5			Discussion of Place Types needs to have an explanation of how the appropriate Place Type is selected for a particular area. What are the criteria?	The Place Type for "Parks and Recreation" and "Special Activity" are broadly defined as to the potential uses covered and include private and public sector uses in the same place type. Since the Form and Character Guidelines are essentially irrelevant to all the potential mix of uses. It is unclear what real value they provide in determining an appropriate planning decision.
	2-5	Paragraph 1		How will the County ensure that the requisite policy refinement will be in place before rezonings start occurring and place types may be controverted?	MODIFY As they currently stand, place types may allow too much flexibility
	2-8	Parks and Rec	X	There are many types of parks--how will the county determine the appropriate type of park without more definition?	ADD Parks and Rec needs more definition
	2-9	Special Activities		Does the FAR mix guidelines provide adequate direction to help provide vision for expectations of retail/employment uses as part of the special activity use?	MODIFY A minimum or maximum FAR for Non-Res uses that are part of the Special Activity area seems appropriate & helpful



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Quality Development	2-10			Should there be a context for “Quality Development” given general buildout in SPA, and minimal residential or commercial projects other than by-right in the Transition and Rural Policy Area?	Edit Note: words “high quality” appear 6 times in first two paragraphs.
				The private sector will “implement” design guidelines and Plan actions refer to “flexibility” and “incentives.” Will the adoption of design guidelines be a “deal breaker” in the review process?	Given the actual way development projects are implemented with clear grading the site, and use of prefab modular buildings how will agreed upon design guidelines be enforced in the field during construction?
Introduction	2-10			Have you considered using independently developed LEED v.4 neighborhood development guidelines? These and other sources (i.e. Star Communities) offer a way to judge projects in a clearly measurable way that helps make clear a community’s progress toward sustainability goals.	ADD: This would allow discussion of issues like green buildings, streetside stormwater management, integration with transportation and other sustainable development practices, in a single place with a scoring system that would be integrated into the review process with each type of development within the county.
Sustainability	2-11			Section on Sustainability needs to recognize that each Spatial Area will have different guidelines for Sustainable development. How can/will this be more clearly referenced in the text?	Overall sustainable development is creating a balance between residential and non-residential development and supporting public facilities and transportation plus the surrounding Green Infrastructure so that each contributes to the whole within the context of “quality development.”
				Shouldn’t the special situation of Data Centers be mentioned when the Plan discusses “energy use?”	Edit Note: listing of water and energy studies seems out of place (or over emphasis?) here. Edit Note: last paragraph (pp 2-11) with energy data seems to detailed and confusing.
	2-11		X	Loudoun is part of a regional sustainability strategy for the DC area. Why isn’t that mentioned as part of the sustainability commitment for the county?	ADD: Include multi-sector greenhouse gas emission reduction strategies https://www.mwcog.org/documents/2017/01/18/multi-sector-working-group-greenhouse-gas-emission-reducing-strategies-air-quality-climate-mitigation-greenhouse-gas-multi-sector-working-group/
	2-11		X	Loudoun is part of a regional sustainability strategy, why isn’t this part of the sustainability commitment for the county?	ADD: Include Regional Climate and Energy Action Plan, 2017-2020 https://www.mwcog.org/documents/2017/03/23/regional-climate-and-energy-action-plan-climate--energy-climate-change-energy/
Principles					



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Principles	2-12	<i>Last bullet</i>	X	How will the County follow the principle of integrating land use and transportation policies to prioritize development first at the Metrorail Stations? There is no discussion of a mechanism.	AMEND: It is unrealistic to think that the County will be able to prioritize development first at Metrorail Stations without a growth management mechanism. The County needs to explore ways to accomplish this goal and include mention in the plan.
Policies, Strategies, Actions	2-12	<i>Policy 1, Strategy 1.1</i>		All Policy Areas have “design guidelines” in the text. What is meant by “more specific” guidelines especially if they are to be “flexible?”	The Plan could consider another approach to this subject by setting forth a set of evaluation criteria which would seek to make the development applicant demonstrate that they have prepared a comprehensive set of design guidelines which they in turn get approved by the County rather than all these specific policies which the County is imposing on the applicant.
	2-13	<i>Policy 2, Strategy 2.1, Action A</i>	X		AMEND: Specify which County regulations need updating
	2-13	<i>Policy 3, Strategy 3.1</i>		What does this mean? Is this referring to integrating uses with the natural environment features or something else--not clear when looking at Action steps.	AMEND: Clarify intent--make this about integrating with natural environment onsite. (Not sure how the Actions fit)
	2-14	<i>Policy 5, Strategy 5.1</i>		What does this mean? Is it saying that there needs to be a physical expression of the business inside in the public space outside?	AMEND: Clarify intent--This section really seems to be about being conscious of the external/public experience of the building façade and design, and make it more interesting for the public at the human scale
	2-14		X		AMEND:Sustainability Policies need revision and strengthening: Policy 1 for this section should be to create a Sustainability Plan that is incorporated into the Plan. These policies are good, but not enough. Resiliency planning should also be part of this section, to include policies to help the County cope with climate change, economic shocks, technology and industry disruptors, loss of a relied-upon business sector, natural disaster, civil strife, and other unexpected events that may occur



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Chapter 2, Quality Development, Sustainability	2-15	Policy 8, Strategy 8.2	X	Missing targets for achieving better energy use	Action G. Reduce energy consumption by 20% through 2023 in public and privately owned buildings and residences. Action H. Increase use of renewable energy sources in Loudoun for all sectors to 20% by 2020, 85% by 2035, 100% by 2050.
	2-15	Policy 8, Strategy 8.3	X	Missing action	Prioritize public investment in energy efficient, clean products and infrastructure and reduce reliance on petroleum-based products.
	2-15		X	Missing action	Prioritize government purchase and use of goods and services that have reduced impacts to human and environmental health
	2-15		X	Missing action	Prioritize the use of Loudoun farm products in government purchase of food.
	2-15	Policy 8, Strategy 8.1, Action B			AMEND: Reword to Construct County facilities to LEED Silver or equivalent standard
	2-15	Policy 8, Strategy 8.1, Action C		How does the County make progress on sustainability?	AMEND: Continue to evaluate all sustainability efforts and improve efforts as new options and technologies become available.
	2-15	Policy 8, Strategy 8.3	X		REWORK: Needs more fleshing out--add resiliency practices and more on sustainable economic practices.
	2-15, 2-16	Policy 9 & related strategies	X	Why are unrelated items all stuck together in one policy?	REWORK: This is inadequate and highlights why a sustainability and resilience plan is needed.
Infill & Redevelopment	2-17			Should the discussion in the Plan be focused on this topic as a standalone section which is a subset of the Suburban Policy Area?	Each has a very different relationship with the private developer and investors, but there is no text on what the private sector role in these activities should be and how the public sector can be a facilitator in the creation of public/private partnerships for implementation.
Vision				Infill, Redevelopment, and Revitalization are three very separate and distinct land use activities. The section treats them collectively with the policies, strategies, and actions. How will this be clarified in the plan?	The availability of profitable market opportunities in these areas is prerequisite to making things happen on the ground. County government action alone will not lead to private action unless market forces are behind it.
Opportunities					
Revitalization Needs					



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Challenges	2-19	<i>Last paragraph</i>		Why "should" instead of "will"?	
Principles	2-19		X	What mechanism will county ensure that displaced populations will have an opportunity to keep living in the community?	ADD bullet: Ensure that redevelopment projects provide space, via a menu of options, for the preservation of low income housing stock that may be destroyed.
Principles	2-20				The picture of the Lucketts Community Center is about "adaptive reuse" which is another subject completely and is not discussed in the text or policies except by "name."
Policies, Strategies, Actions					
	2-20	<i>Policy1, Strategy 1.1</i>	X	How can the county facilitate engagement?	ADD Action: Create a community engagement process to facilitate developer interaction with the affected community.
	2-21	<i>Call-out Box</i>		The box has good content, but it is floating--not repeated within the principles, structure of the policies, strategies, actions, or in the guidelines.	
Place Types			X	Are there place types that are most appropriate for these sites in addition to principles and guidelines?	ADD: Consider the components needed for successful infill/redevelopment -- minimums for parks/open space/community facilities based on community input
Urban Policy Areas	2-25			What is the base line data that identifies the development potential in each UPA area given existing land use?	The two proposed urban areas are very different and will have different impacts on County. They need to be discussed separately.
Vision	2-25			How can the vision be accomplished when it's muddled?	ADD Bikeable to the first sentence after walkable. Stop first sentence after "transit-oriented development" to keep clarity about the intent to make dense urban areas transit-oriented. Remove text in the introduction that refers to the northern UPA.
	2-25	<i>Introduction</i>	X		CONSIDER: Can Loudoun use car-lite or car-free zones to provide bonus density within the 1/2 mile radius of the metro stations. http://Carfree.com



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	2-25	Introduction--2nd paragraph			AMEND: With the same densities as the suburban commercial centers and lack of integrated transit, the Rt 7/Rt28 intersection should remain in the suburban policy area. It also doesn't meet the UPA description on pg 23 at the top of the page.
Policies, Strategies, Actions	2-26			The metro area should have clear policies regarding how market development over time will be managed (County Task Force with appropriate consulting expertise). Should it be allowed to fill up with current marketable projects?	There needs to be some policies regarding how to get a diversity of housing solutions and workforce housing into the urban areas.
	2-27			Edit Note: Policies and Strategies include 8 references to "walkable communities." Are there other terms or descriptions that can be used?	Each of the three metro stations has a clear comparative advantage which needs to be recognized.
	2-27	Strategies 1.1, 1.2, 1.4			AMEND: The strategies are relevant to the metrorail area, not to the northern area. For 1.2 substitute the word "station" versus "buffer"
	2-27	Strategy 1.6			AMEND: End the sentence after "appropriate."
	2-27	Strategy 1.7		How would a drive-through be accommodated at these densities in a mixed-use building?	STRIKE: Strategy 1.7
	2-27		X	How will the plan offer guidance on the difference between the Gateway and Ashburn station areas?	AMEND: The two station areas have different characteristics and limitations which should be recognized and incorporated into the plan.
	2-27, 2-28		X	What happened to the detail in the Silverline Plan? How will it be incorporated?	AMEND: Reference and adopt the Silver Line small area plan concurrently with the Comp Plan.
Design Guidelines	2-28			How are public schools and facilities going to be incorporated into the design and who is to pay for them?	Note place types only require between 0% and 5% civic space which clearly be insufficient for schools and other public facilities required to service the areas. Text makes no mention of schools and public facilities.
				How can we justify the expense by including uses and activities which will attract the entire community?	Given the great diversity in the Place Types the design guidelines seem rather vague and general.
				Can/will a matrix be added to analyze the "form and characteristics" of the Place Types?	Range of flexibility between residential and non-residential could end up with mainly residential.



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				The text needs some analysis of the commuter patterns between bus and metrorail useage versus cars. Will this be added to the Comp Plan or Transportation plan?	The special issue of data centers needs to be recognized as it affects the buildout of the Metro District.
	2-29	<i>Call-out Box</i>		What is the rationale/purpose for the Call-Out boxes? Is the text more important than the text in the body? Is it considered a policy? Is the text in the Call-Out box repeated anywhere in the body of the text?	AMEND: Call-out boxes are confusing and lead the reader to believe something that may be inaccurate. The rationale should be explained.
	2-31	<i>Sidewalks, street trees, and plantings</i>	X		ADD: Incorporate stormwater bioswales with native plantings into the streetscape to serve both visual interest and stormwater management function.
	2-35 thru 2-40	<i>Place types</i>	X		ADD: bicycling references to pedestrian references throughout the place types.
	2-37	<i>Place Type: Urban Community Commercial</i>			STRIKE: In an urban environment, mid-to-long blocks are not appropriate.
	2-38	<i>Urban Regional Commercial</i>		Why is this classified as an urban place type?	AMEND: This partially describes a suburban development pattern when not vertically integrated. In an urban setting, the big box store has been successfully incorporated as a multi-story tenant, and should not be included as a separate use.
Suburban Policy Area	2-41				
Vision / Introduction	2-41			Where will schools and public facilities required to support the SPA be located and will the remainder of the Suburban Area be expected to provide public facilities for the Urban Policy Area?	The Plan needs to recognize that the Suburban Policy Area will build out completely during the next 20 years and therefore a strong analysis is required as to the schools, and public facilities that will be needed to overcome existing deficits and accommodate future growth.
				What basic data can be included to quantify the existing land use in the Suburban Area and projections of land available for development?	There needs to be some basic data on the existing land use in the Suburban Area and some projections as to land available for development. The approved pipeline needs to be included so that a total breakdown of residential units is possible.
Vision	2-41			What does it mean by "self-sustaining communities?"	



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Introduction	2-41				STRIKE: Take out reference to 3rd UPA at Rt7 and Rt28
Land use	2-42			Wouldn't the Infill material at the beginning of the Land Use Chapter could be usefully included here as it is the only major opportunity for future development?	
Influences /Opportunities	2-42			Why is there no discussion of the three "communities surrounding the Metro Stations" which justify our proffer policies?	
	2-42			How does the plan answer the mounting concern about lack of transit access voiced by the public input on siting development projects before the transportation network and public services are available to support them?	AMEND or STRIKE: New development opportunities in suburban place types should not happen unless and until there is a transit plan to support them
Growth & Demand	2-43			Does the Plan recognize that the potential market for housing in Loudoun outruns the available potential buildout in the Suburban and Urban Policy Areas (especially for SFD and SFA)?	In this draft, it does not. Therefore a firm set of policies are needed to clarify that County policy is not limit residential development to that which can be accommodated and served in the UPA and SPA.
	2-43			Is there a plan for ensuring that there are adequate school sites for the development being proposed?	
Policies, Strategies, Actions	2-46	<i>Policy 1, Strategy1.4, Action D</i>		How does the plan demonstrate a fully integrated land use/transportation approach?	AMEND: The Comp Plan and Transportation plan need to be more integrated in order to ensure that development has the needed infrastructure for a full complement of transportation connections to accommodate walk/bike to car/bus/transit network.
	2-46	<i>Policy2, Strategy2.1</i>		How can the county ensure that the places being designated for mixed use development will be successful, complete existing communities? Has the county done an office market analysis to determine what percentage of the current office market is locating outside of mass transit corridor?	RECONSIDER: Mixed use developments won't be mixed use if office/employment uses are not sufficient to meet the vision of the place types. Loudoun should demonstrate that there is a market to support an office/employment locations in the sites being designated for those place types.
	2-46	<i>Policy2, Strategy2.Action D</i>		How can the county ensure that flexibility will not lead to imbalanced communities if there is not a market for the office/employment uses?	STRIKE: Eliminate the new mixed-use areas on former Class A zoned parcels.



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Design Guidelines				Given the limited amount of development, if any, which will not be infill or redevelopment -- does it make sense to have such elaborate design guidelines which seem to reflect "greenfield" development?	It needs to be clear if the Plan for Non-Residential Uses is all in Mixed Use projects or if separate land bays are going to be reserved for special commercial uses.
				There are 7 Place Types included. How much potential is there for any one of the Place Types to be used in the SPA given the limits on available space?	
Place Types	2-56	<i>Suburban Employment</i>		What justification is there to call this Suburban Employment with such a high residential mix?	AMEND: This place type has too much residential--should be 0-20% max, with employment primary and residential only allowed afterwards.
Transition Policy Area	2-61			If the public, County Staff, Planning Commission and BOS do not approve of the addition of rural policy area land being added to the Transition Area, how and when will this be deleted from the draft?	The addition of rural policy area land to the Transition Area should be deleted. 1) It removes the spatial break between Leesburg JLMA and suburban style development and the suburban policy area; 2) it will be likely affected by the extended Leesburg Airport noise cones; 3) it is a dangerous precedent as it opens the possibility of further conversions of the RPA to more intensive land uses.
Vision	2-61			Edit Note: Why does the Vision Statement not include reference to the "transition" purpose of the TPA?	Including the boxed "history" statement which is no were else presented for other policy area, opens the possibility to refer to this past planning when efforts continue to suburbanize the TPA. The box should be deleted.
	2-62			Will inconsistency in acres available for development be fixed?	Edit Note: Pp2-62 the area remaining for development is quoted as 6,170 and a sentence or so later 6,200. Should be consistent.
Trends & Influences	2-62			"Trends and Influences" text vacillates between advocating more density and diverse house types and supporting the original concept of the TPA. How will this vacillation be corrected?	The Plan needs to be clear that it is NOT opening the door for ever more development by allowing (even encouraging) applications for suburban style development.
Development Principles	2-63			Five of eight Development Principles are concerned with "New Development." Was this the intent of this section?	There is a rich data base available for analysis of the TPA which has NOT been included. It shows by land bay what the Plan calls for. This detail is required.
Policies, Strategies, Actions					



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Design Guidelines			X	Why are discussions of the Light Industrial Area and Data Centers not included at all?	
			X	Why are discussions of Mixed Use Commercial Centers not included at all?	Oppose the mixed use commercial areas as clearly not neighborhood serving, but rather highway oriented. Potential residential densities inappropriate.
	2-67			Edit Note: Diagram on pp 2-67 does not look like a “traditional village lot pattern” with what appears to be a major road splitting the site and no obvious “center.”	Place Types require 50% open space and while the density allowed is assumed to be 100% of the property. Therefore, where the allowable density is 4 DU’s per acre the actual buildout can be a net 8 units per acre which is in the upper range of what is to be permitted in the SPA. Density should be based on net buildable footprint, NOT gross size of the property.
Rural Policy Area					
Vision	2-75	<i>The Rural Policy Area (RPA) is an enduring rural landscape that is characterized by a unique composite of natural and man-made environments, rural economy uses, working agricultural lands, open space, and a limited residential base, all of which provide a high quality of life.</i>	X	What about the risk of future expansion of the towns and/or JLMAs? How will the open space of the RPA be protected from future development? What about enhancing the recreational and green infrastructure services provided by the RPA?	LANGUAGE: The Rural Policy Area is a permanent and sustainable resource, the protection of which is of the highest priority, including the towns and villages encompassed within it. Together they form an enduring rural landscape that is characterized by a unique composite of natural and man-made environments, rural economy uses, working agricultural lands, permanently protected open space, a network of integrated recreational trails, enhanced environmental and natural networks. and a limited residential base, all of which provide a high quality of life.
Rural Residential	2-76			The typology of rural residential needs to be recognized (land stewards, small lot farming, villages, hamlets, and clusters). Can this be added?	Rural Residential discussion needs to recognize the different allowable densities between North and South. Because North allows a higher density yield the pressure is in the North. If the Transition Area is kept at proposed density or lower then there will be increasing pressure for by-right housing in the rural area.



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	2-76			Can the text leave open the door to returning the cluster zoning in the North to the original standard of cluster at 10 acres average per unit?	Recommendations to improve the cluster concept need to be included such as an Open Space Plan, diversity of house types, rural standard architecture. There should be policies covering the “development easements” involved in cluster development (estimated 22,000 acres).
	2-76			Implications for public facilities needs to be included as Towns can no longer accommodate all schools, costs of growth are not offset with proffers. How will this be addressed in the plan?	
Rural Economy	2-78	<i>Last Line of: first complete paragraph: Like many other of Loudoun's other rural business uses, these hospitality and tourism based .</i>	X	Can we firm up the importance of the green infrastructure for economic uses?	Add at the end of the paragraph after visitors: "Therefore, it is critical to maintain the green infrastructure that provides the setting and context for our rural tourism economy."
				How can the Rural Economy section more clearly recognize the three distinct concentrations each with different needs and land use implications (land steward's consumers, agriculture, horticulture, and equine industry are all separate from rural tourism)?	The Plan should include recommendations for how sustainability of the rural area can be achieved by including vital projects and programs needed. (slaughter house and vegetable processing plants, etc)
				If the issues and need for balance between tourism and taxpayer property rights are not addressed, how will the comp plan be useful to evaluate proper placement of Rural Uses to avoid complaints based on health, safety and welfare?	The rural tourism discussion needs to recognize the need for performance standards and locational criteria, permitting process, and complaints.
Farmland Preservation & Protection					
Future of Rural Strategy					
Policies, Strategies, Actions	2-79	<i>Unless otherwise specified, the following policies, strategies, and actions apply only within the RPA.</i>		If the RPA policies are in conflict with the county-wide policies -- which will take precedence?	Add the following sentence: "Within the RPA, these policies will take precedence over county-wide policies where the two are in conflict."



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Chapter 2: LAND USE					
Section/Heading Policy/Strategy/ Action #	Pg #	Plan Text / Paragraph Reference (Optional)	Not Present	QUESTION(S)	COMMENT/INPUT/RECOMMENDATION
	2-79	<i>Policy 1: The RPA's land use pattern builds upon natural, cultural, heritage, and agricultural resources in order to provide character-defining features of the rural landscape.</i>		Why does the policy refer to providing character defining features when one of the parts of the vision is to retain those features?	Replace "in order to provide" with "while preserving." The features that uniquely define Loudoun's rural environment already exist.
	2-79	<i>Support uses that protect, preserve, and enhance natural areas and open space, retain farmland and the vitality of the rural economy, and foster a high quality of rural life for residents.</i>		How will progress in achieving this strategy be measured? What are the goals in terms of overall percentage of the area to be retained as open space?	Add the following actions: C. Measure and report annually on the aggregate amount of open space in the combined Rural, Town, and JLMA areas and on the amount of farmland in the county. D. Report annually on the number of acres protected by easement. E. Set goals for increasing the number of acres protected by easement
	2-80	<i>Action A.: Establish subdivision regulations and design standards that improve the design of clustered residential development</i>		What is the relationship between these regulations and standards and the Design Guidelines (page 2-82)?	Replace with the following sentence: "Establish subdivision regulations and design standards to implement the RPA Design Guidelines."
	2-80	<i>Add Action Item, after Action B.</i>	X	What about design standards for non-clustered housing and open space?	Add the following paragraph: B. " Establish residential guidelines that indicate a preference for house designs which reflect traditional rural architecture, require a Soil and Water approved Open Space Plan to preserve agricultural opportunities and describe how development eased property will be used."
	2-80	<i>A. Adopt zoning regulations and development standards for rural economy uses . . .</i>		What about the character of the surrounding countryside and neighborhood?	Adopt zoning regulations, performance standards, and development standards for rural economy uses . . .
	2-80	<i>C. Non-agricultural commercial uses may be permitted by Special Exception</i>	X	At what point do commercial uses spoil the overall look and feel of the Countryside?	Be more explicit and clear: "Non-agricultural commercial uses that meet performance standards may be permitted by Special"
	2-80	<i>Strategy 3.1: Actions: Add D: .</i>	X	Should rural economy uses be subject to design guidelines?	Add D: "Non-agricultural commercial uses should have design guidelines that reflect traditional rural architecture as part of the permitting process"



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	2-80	<i>Strategy 3.1: Actions: Add E:</i>	X	Should rural economy uses be subject to design guidelines?	Add E: "Prohibit non-agricultural commercial land uses have no direct connection to or reason to be in the rural area."
	2-80	<i>Strategy 3.2: Promote the retention and development of rural business uses . . .</i>		At what point do commercial uses spoil the overall feel of the character created by the agricultural and equestrian industry?	3.2) Recognizing that the character and tone of the RPA is set by the agricultural and equine industry, promote the retention and development of rural business uses . . .
	2-80	<i>Promote retention and development of rural business uses that sustain and support the County's agricultural and equestrian industries</i>		If the RPA policies are in conflict with the county-wide policies which will take precedence?	Add the following sentence: "Within the RPA, these guidelines will take precedence over county-wide policies where the two are in conflict."
	2-80	<i>Actions A: Adopt zoning regulations and development standards . . .</i>		At what point do commercial uses spoil the overall look and feel of the Countryside?	Adopt zoning regulations, performance standards, and development standards for rural economy uses . . .
	2-80	<i>3.2 Strategy: Actions: A> Adopt zoning regulations and development standards. .</i>	X	Should Livestock and vegetable processing be permitted?	Adopt zoning regulations, performance standards, and development standards that include new types of rural business and agricultural uses, permit flexibility for sale and processing of farm products, and promote. . .
	2-81	<i>Add Action Item, after Action D.</i>	X	Why not tie in tourism uses near the multi-use trail networks?	Add Action E. Encourage use of existing and development of new tourism based uses proximate to the multi-use trail network
	2-81	<i>Strategy: 3.3, Actions: C. Retain the Rural Economic Development Council (REDC) as an advocacy . . .</i>		What if their causes are in conflict with the RPA causes?	3.3) Retain the Rural Economic Development Council (REDC) as an advisory committee on initiatives, programs, . . .
	2-82	<i>Unless otherwise specified, the following guidelines apply to only within the RPA.</i>		If the RPA policies are in conflict with the county-wide policies which will take precedence?	Add the following sentence: "Within the RPA, these guidelines will take precedence over county-wide policies where the two are in conflict."
Design Guidelines	2-82			Why do the Design Guidelines appear to relate to cluster developments only?	Residential guidelines should indicate a preference for house designs which reflect traditional rural architecture, require an Soil and Water approved Open Space Plan to preserve agricultural opportunities and describe how development eased property will be used.
	2-82	<i>Design Guidelines</i>	X	How will the design guidelines support the retention of the unique character of different areas of western Loudoun?	Include the following guideline: "Encourage designs that respond to and echo the historic architecture of the surrounding area."



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	2-82	<i>Design Guidelines</i>	X	How will the design guidelines support the retention of the unique character of different areas of western Loudoun?	Include the following guideline: "Encourage designs that respond to and echo the historic architecture of the surrounding area."
	2-83	<i>6. Develop rural economy and rural business uses to blend with the natural landscape.</i>		What about Place Types for Rural Tourism Uses and blending with the surrounding uses? Rural Tourism uses need development guidelines as well (even if by-right) so they will/should be referenced in the permitting process.	6) Develop rural economy and rural business uses that are compatible with surrounding uses, meet performance standards, and blend with the natural landscape.
	2-85	<i>Rural North Place Type</i>		How will a single place type for the entire rural north be used to guide the development of comprehensive future zoning ordinance revision referred to on page 2-6?	
			X	Why is there no clear reference to the requirement for agriculturally based uses for the Rural Policy Area?	Need clear policy on Prohibiting land uses in the rural area which have no direct connection to or reason to be in the rural area.
Rural Villages	2-87				
Vision/Introduction	2-87	<i>By encouraging compact, new residential and non-residential development within the Villages, these policies complement the County's efforts to preserve open space and maintain the character of the rural landscape</i>		How can language relying on "encouraging" be enforceable?	Pp 2-87 Introduction third paragraph "By encouraging compact..." should be replace by "requiring."
Policies, Strategies, Actions	2-88	<i>E. Retain existing Rural Commercial (RC) zoning and consider new zoning regulations and development standards for commercial uses in the Rural Villages which are compatible with the settlement patterns and neighborhood scale. F. Develop criteria to evaluate Rural Villages to determine if their current designation is warranted and amend the Comprehensive Plan and Zoning Ordinance as appropriate.</i>		Why are these Actions included when they are not in line with the public's view of Rural Villages?	Section on Policies, Strategies, and Actions: 1) delete actions E and F under policy one (RC has been modified for suburban areas and is no longer appropriate for historic villages; a new zoning category for village commercial is needed; 2) All recognized villages need not be reconsidered.



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	2-89	<i>Strategy 1.3. Higher than existing residential densities within the Rural Villages will be supported when the design of the project reinforces the character, development pattern, and identity of the village. Conventional, suburban forms of development are not appropriate in or contiguous to Rural Villages.</i>		If the BOS directive was to not increase residential density in the Rural Policy Areas, why does Strategy 1.3 give permission in the comp plan for "higher than existing residential densities?"	Strategy 1.3 should be deleted as under no circumstances should higher than existing residential densities be considered in historic rural villages.
Design Guidelines			X	Why were known traffic problems in rural villages not given more recognition or focus (see Waterford)?	
Towns & JLMAs	2-92				
Vision/Introduction			X	Why were Towns of different scales and importance all treated the same in the plan?	Leesburg is of different scale and importance compared to the other towns and should be recognized as such with its own policies, strategies, and actions as mutually negotiated with town officials.
Trends & Influences					
Policies, Strategies, Actions	2-94	<i>Policy 1: The County will support conservation of historical and cultural resources in and around the Towns to preserve the identity of each Town distinct from the surrounding rural area.</i>	X		Add the following strategy: "Retain the current boundaries of JLMAs to limit the expansion of residential development within the RPA."
Policies, Strategies, Actions	2-95	<i>Strategy 1.2: Action D. Support the Towns in negotiations with VDOT</i>		What about Route 15?	Add Route 15 after particularly . . .
			X	Most likely schools will be located in rural areas and their impact needs to be considered. What are the realistic changes that Schools and other public facilities will be built in towns in the future given their build out?	The Policies, Strategies, and Actions and Guidelines are mostly irrelevant given the actual state of development in the towns.



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				Have estimates of potential residential growth and DU's been calculated?	Since school costs are charged to the County DU's in towns are fiscally positive and are used to pay off water/sewer debt. This has an impact on the surrounding rural area.
Development Guidelines	2-96			The JLMA's have been largely built in and around towns. What factual information is provided to determine what remains to be built?	Each JLMA is different and should be related to the town. Major road projects and public facilities need to be noted for each
MISSING:			X		Native plant policies for County facilities, new residential and commercial development and redevelopment
Transition Area Map			X		Ensure that lands designated for parks and open space are not allowed to convert to commercial or residential uses--Whitman North rezoning ZMAP 2014-0006
Transition Area Map			X		Ensure that all lands designated as Transition Large Lot Neighborhoods keep the underlying density as discussed during stakeholder meetings. It seems that this wasn't captured in writing anywhere.



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Vision	3-2	<i>Our natural resources provide environmental, economic and health benefits.</i>		Shouldn't they be referred to as "assets" from which we benefit, rather than "resources" which conveys something to be used? Shouldn't the vision include protecting and enhancing these assets for more than just "enjoyment?"	Update vision to: Protect and enhance the County's Green Infrastructure networks of environmental, natural and heritage resources which are fundamental to the County's sustainability and resiliency, and to the health, safety, welfare and enjoyment of current and future generations.
Introduction	3-2	<i>Line 4</i>			Insert "wildlife" before the word "habitats".
	3-2		X		Need a clear statement on what Green Infrastructure means as a network linking together these assets with trails, parks, and school sites.
	3-2	<i>Paragraph 2, line 1</i>	X		Replace first sentence with: This chapter provides guidance for the protection and retention of Green Infrastructure assets as elements in all aspects of the development and redevelopment of the County .
	3-2		X	Why was Green Infrastructure removed as the framework that will guide how and where development and redevelopment occurs? Who benefits? In an era when communities are preparing for the future using knowledge about the impact of replacing green infrastructure with impervious surfaces, why is our new plan going backward?	1. Reinstate green infrastructure, or a watershed-based approach to land use planning, as the basis for the chapter. "protection of these resources is interrelated" doesn't make sense. the resources themselves are interrelated. 2. The paragraph doesn't fully convey the benefits of green infrastructure. Consider adding "green infrastructure provides the most cost-effective measures to achieve resilient landscapes that meet water quality goals, reduce energy use and provide stormwater filtration. Connected natural landscapes are more adaptable to stressors, are healthier habitats and provide greater protection from droughts and flooding. 3. Add enhancement of resources, along with protection.
	3-2		X	An important tie-in to the value of green infrastructure for sustainability and resilience. Missing?	Climate change and the effects of urbanizing large swaths of land will be addressed through a comprehensive green infrastructure plan that outlines actions to protect and restore natural resources. This will ensure that Loudoun residents can continue to rely on ecosystem services that minimize the costs to provide clean drinking water, provide a base for economic vitality and preserve quality of life.
Principles	3-3	<i>Principles, second bullet</i>		Why have the current plan's three goals been reduced to principles for consideration?	Update text to: Preservation – Retaining and protecting environmental, natural, and heritage resources in all development projects.



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Topics	3-3	<i>Missing: Climate Change Strategy</i>	X	Why is climate change not included as a topic?	Other communities are addressing climate change in an effort to be prepared and resilient, environmentally and economically, If not laid out in the plan, the plan should at least contain an action to update the CES with appropriate climate change strategies.
Water Resources	3-3			If overlay district protections have been removed, why are river and stream corridor resources capitalized and acronymized? If there aren't any overlay district policies, shouldn't protections be extended to our stream resources regardless of the number of acres they drain?	If the County is not going to create an RSCR overlay district, then spell out that protections will be added as ordinance language. Would it be in zoning or codified ordinance?
	3-3	<i>Text Box</i>		Why are text boxes used?	Information in text boxes is not necessarily contained in the text, making it confusing and unhelpful.
Impaired Streams	3-4			Why have impaired stream segments been removed from the chapter's map?	Include impaired stream segments on the map
Watershed Management Planning	3-4			Why is there no reference to specific steps/projects that have been implemented as a result of the Comprehensive Watershed Management Plan?	Plan needs specifics on what has been done in the 10 years since the plan was written, and the specific benefits, lessons learned are more helpful than what's there currently in the paragraph.
Geologic & Soil	3-6	<i>Mountainsides and steep slopes</i>	X	Why are Mountainside and Steep Slopes treated the same, when the former is an Overlay District?	The text should separate out "Steep Slopes" from the "Mountainside" which is an Overlay District as policies should reflect the real differences between them.
	3-6	<i>Mountainsides and steep slopes, last two sentences</i>		How will the MDOD zoning ordinance be aligned with the plan, if the plan no longer defines the MDOD?	1. "Policies in this plan also encourage mountainside areas to be placed under permanent open space easement" is a false statement. No such policy pertaining to mountainside area exists in the draft plan. 2. Reinstate the MDOD in the plan. County staff uses the plan's language to address zoning amendment and special exception requests.



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Forest, Trees, Vegetation	3-7	Paragraph 2		Why would we trust Tree Cover Inventories to be completed by applicants? Why are MDOD, LOD, and Steep Slope Standards implemented in Zoning Ordinance only, rather than being laid out in the plan? Removing standards from the plan leaves natural assets vulnerable to zoning amendments and special exceptions.	Devote dedicated County staff to conduct tree cover inventories. Incorporate existing tree cover into all areas, not just in required buffers. Include standards in the plan.
	3-7	Missing: Establishment or Maintenance of a Tree Preservation Ordinance	X		Establishment of a Tree Preservation Ordinance is included in current plan, but not the draft.
Historic/Archaeological					
Cultural Landscapes					
Plant & Wildlife Habitats	3-10	Paragraph 1, line 2			Replace "preferable to" with "necessary, rather than"
	3-10	Paragraph 2			Update last sentence to: "The County will also protect habitat for rare, threatened, and endangered plant and animal species and Species of Greatest Concern in accordance with the Federal Endangered Species Act and Virginia Wildlife Action Plan. Action steps call for legislative development applications that have the likelihood of one or more natural heritage resources to have the County conduct a species assessment and develop a plan for impact avoidance in cases where the presence of the species is identified."
Complementary Elements	3-11	Paragraph 1		Data centers and mowers are also sources that threaten air quality. Can these be added?	Add data centers and mowers as sources that threaten air quality.
	3-11	Lighting and Night Sky		Why is "beauty" the only consideration for protecting the night sky? Dark skies benefit pollinators, plant life, resident and migrant bird species, wildlife and human health.	Adopt Dark Sky policies.



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Influences & Opportunities	3-12			Shouldn't the Plan language sound more intentional?	2nd sentence: Replace "A proactive approach to water quality could help" with "An integrated green infrastructure program will help". 3rd sentence: Replace "has the opportunity to identify" with "can identify." 4th sentence: Replace "has the opportunity to document" with "can document and assess" 5th sentence: Replace "consider the development of" with "develop". 6th sentence: Replace "The Board can use this report to identify future goals." with "The Board and public can use this report to identify future goals and analyse gaps in progress."
Policies, Strategies, Actions	3-12				1. Consider moving policies, strategies, and actions for each component to the end of the text about that component, as the policies require context. 2. The plan's current vision doesn't encompass its policies.
Natural and Heritage Resources	3-12	<i>Policy 1</i>			AMEND: Utilize the green infrastructure network to protect natural and heritage resources.
	3-12	<i>Strategy 1.1</i>		What are the "goals"? Are they goals, or principles?	Consider reinstating the draft plan's "principles" as "goals". Reword the Strategy: "Create mechanisms to further conservation, preservation, restoration/recapture, and public education"...
	3-12	<i>Action A</i>		The Green Infrastructure needs to be interwoven throughout the policies to make what it is, and what it does, clear to the reader.	AMEND: Maintain a map of natural and heritage resources as part of an integrated green infrastructure system and contiguous network of natural and passive open spaces and active recreational sites.
	3-12	<i>Action C</i>		As this is the first mention of Conservation Design, shouldn't a brief explanation be provided?	A brief explanation of what Conservation Design consists of needs to be placed in the text under Green Infrastructure.
	3-13	<i>Action E</i>			Replace "Consider establishing" with "Establish" (!)
	3-13	<i>Action H</i>		How can this action better clarify what the green infrastructure is intended to do?	AMEND: Direct public investment and resources toward completing the green infrastructure network of resources and recapturing natural and heritage resources and their benefits in developed areas.
	3-13	<i>Action J</i>		How can this action better clarify how development will interact with the green infrastructure?	AMEND: Ensure that development proposals create links to adjacent green infrastructure resources to create an integrated network.



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	3-13	<i>Strategy 1.2, Action A</i>		What is meant by a “public-private conservation foundation?”	This needs some thought as to what is involved before it goes into the Plan.
	3-14 thru 3-19	<i>Policy 2, strategies 2.1 through 2.4</i>		How can this section be made clearer? There is overlap, some things are mentioned before an explanation is given. The green infrastructure and watershed management should be mentioned at the start as organizing and management means to accomplish the strategies.	AMEND: The County will use the Green Infrastructure approach to protect natural ecosystems, restore water quality, serve Loudoun’s population, and support the built environment through healthy surface and groundwater resources.
River and Stream Corridor Resources				Should a River and Stream Corridor Overlay District be proposed? What does RSCR really mean? Or will the County put this into the zoning ordinance?	An overlay district would define what it is we need to protect.
	3-15	<i>Action A</i>		What are the objectives of the policies?	There is only one policy.
	3-15	<i>Action B</i>		Why not take a watershed-based approach to land use planning, which would cover all of our smaller watersheds that are encompassed by the Chesapeake Bay watershed?	This is a forward-thinking approach that would provide higher level protection the County’s assets.
	3-15	<i>Action F</i>			Add "such as a stormwater utility fee, PACE, or dedicated funding stream" after "funding program".
	3-15	<i>Action I</i>		Couldn't Loudoun incentivize the needed reforestation of Major and Minor floodplains by providing floodplain delineation and floodplain alteration study when non-profits have the opportunity to offer floodplain reforestation projects? Also, why would the County prohibit the reforestation that wetland mitigation banks could offer in Major and Minor floodplains?	Planted trees create no more "rise" than natural regeneration. AMEND: Support and incentivize reforestation for degraded forested areas in floodplain areas to mitigate the loss of native canopy coverage as a result of construction or past farming practices.
	3-15		x	Shouldn't Loudoun be more proactive in determining the appropriate siting of stormwater "hotspots?"	ADD: Create new standards for siting gas stations, data centers, and other uses with petroleum storage facilities for distance from streams, public drinking water sources, schools and other sensitive populations, public and private drinking water sources & wells.
	3-16	<i>Strategy 2.1, Action L</i>		What are the objectives?	



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	3-16	Strategy 2.2, Action A		Loudoun's stream valleys are the most precious of our natural resources, providing flood control, our drinking water, and nature corridors to ensure wildlife continues to flourish. Can we not extend our efforts beyond 100 foot buffer? Can we clear up ambiguity on where buffer is?	Change Action A to: The RCSR Buffer will include the following elements: 1. All 100 year flood plains defined by FEMA and Loudoun County. 2. All wetlands connected to the stream valleys (generally they are located within the 100 year flood plain). 3. Where no floodplain exists or is less than 100 feet wide on one side of the stream, then a 100 foot buffer will apply as long as river bank is less than 25% slope. 4. For river banks with greater than 25% slope, a 200 foot buffer will apply when the flood plain does not reach the 200 foot limit.
	3-16	Strategy 2.2 Action A	X	How does this differ from what will be managed via ordinance or overlay district? It appears to conflict unless it's made clearer that this is for properties that are not being developed or redeveloped.	AMEND: A. Develop and use incentives to encourage home owners to maintain a 100-foot minimum vegetated riparian stream buffer.
	3-16	Action M			"Coordinate with Loudoun Water and..."
	3-17	Permitted uses in the RSCR		What is the definition of The River and Stream Corridor Resources(RSCR)?	The side panel, entitled "Permitted Uses in the RSCR" is very unclear. The plan cannot state a list of permitted uses for a particular land parcel if it doesn't define what land parcel it's talking about. If the intent is that a strip of land from the stream edge to 100 feet away from the stream edge would allow all these uses, the plan is not protecting the stream and therefore violating all the strategies and actions in Policy 1 and 2 within this chapter.
	3-17	Permitted uses in the RSCR		How can this page be clearer and part of the policies versus appearing to hang out independently?	
	3-17			How much land is in a RSCR? What are its borders?	
	3-17			Are you implying that only the 100 foot buffer is the RSCR?	
	3-17	Box #2		Why would the Comp Plan leave the determination of what adversely impacts our rivers and streams up to the developers?	Remove this language. Determination of what adversely impacts our rivers and streams should not be left up to developers.



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	3-18	Strategy 2.3, Action A			Replace "Encourage the implementation of" with "Implement". Or alternatively amend: "Provide a suite of enhanced pollution control measures and Best Management Practices for voluntary adoption or required implementation such as..."
	3-19			Why is the content in the blue section on page 3-19 not aligned with any policies or strategies or actions elsewhere in Chapter 3?	Most side panels in written reports duplicate and highlight wording elsewhere in the text.
	3-19			What is the definition of a "voluntary greenbelt"? Why is there no wording to clarify all these multiple buffers? The document references 50 foot buffer, 100 foot buffer, 300 foot buffer and 1000 foot greenbelt. Can we not have a table to show when each of these various buffers are to be applied?	Suggestion: Create two clear categories. One, what can and cannot be done in the "Extended Floodplain" (which would include the wetlands, the 100 year FEMA Floodplain and a minimum 200 foot buffer when grade along stream exceeds 25%; if grade less than 25%, 100 foot minimum buffer.) Then also a 1000 foot greenbelt strip beyond the "Extended Floodplain". Within the Extended Floodplain, permitted uses would be quite restrictive to ensure water quality and undisturbed nature corridors. Within the Greenbelt, trails for equestrian use, bike trails etc. could be permitted.
	3-20		x		Consider adding an action stipulating that if Loudoun Water declares a water emergency and implements restrictions, they will apply to groundwater users as well. This will limit the dropping of the water table and help prevent shallow wells from running dry. (This action is used in Clarke County.)
	3-20		x	Why does the Limestone policy not reflect/describe the importance of the Limestone Overlay District?	Limestone policy needs to reflect importance of the Limestone Overlay District.
	3-20	Strategy 3.1		To be more clear and specific, should the performance standards of lands underlain by limestone be described?	It is appropriate to mention the types of performance standards that apply in the district--again the boxes are confusing and not identified as policies, strategies or actions.
	3-21	Strategy 3.2		Why are the specific programs and actions for protecting Prime Agricultural Soils not included?	Prime Agricultural Soils: There are specific programs and actions that the County can take to protect these soils which should be mentioned. The inclusion of the proposed "action" A is useless.
	3-22	Action A, box		Why would we allow special exceptions in Sensitive and Highly Sensitive areas?	Remove box.



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	3-22	Action B		Why would we consider the development of a Ridgeline Protection Overlay District when we already have the broader protections of an MDOD? Who would benefit?	Incorporate ridgeline protections into existing MDOD.
	3-22	Action D		Under what circumstances would development be unavoidable on questionable soils?	Don't allow development on questionable soils.
Forest, Trees, Vegetation	3-23	Policy 4			AMEND: "Preserve, protect, and manage Loudoun County's forests and trees as a component of the green infrastructure network for sustainability, public and ecosystem health, and the safety, welfare and enjoyment of current and future generations. These resources..."
	3-23	Strategy 4.1, Action A		Why would we leave Tree Cover Inventory to the applicant? This is an important asset that should be handled by the County.	
	3-23	Strategy 4.1, Action B		How will preservation of existing trees be incentivized?	
	3-23	Strategy 4.2			"Develop tree canopy goals by watershed and subwatershed to enhance the green infrastructure network and promote..."
	3-23	Strategy 4.2 Action A			Replace "Prioritize" with "Require" and Add new language: Require the planting of indigenous vegetation with new development and specifically along those corridors that provide connections to other natural and heritage resources.
	3-24	Strategy 5.1			Good strategy!
	3-25	Action J		The action supports the designation of additional Historic and Cultural Conservation Districts. How will existing and new conservation districts be preserved and maintained?	Add Historic and Cultural Conservation Districts as a unique Place Type with their own design standards.
	3-25	Action L: Where consistent with the applicable provisions of the Virginia Code Section 15.2-2303, applicants may provide cash contributions to the County for the enhancement and/or improvement of historic features within Loudoun to fulfill the open space guidelines if the County agrees to or requests the exchange		How is a policy that establishes tradeoffs between open space and historic resources consistent with the plan's goal to strengthen natural and historic assets?	Strike Strategy 5.1 Action L



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Section/Heading Policy/Strategy/ Action #	Pg #	Plan Text / Paragraph Reference (Optional)	Not Present	QUESTION(S)	COMMENT/INPUT/RECOMMENDATION
Natural and Heritage Resources	3-26	Strategy 6.1 Action B		Why would we allow applicants, rather than County experts, to conduct species assessments?	Example: What the applicant did with regard to species assessment during True North Data Center rezoning application.
Complementary Elements	3-27	Strategy 7.1, Action A		Why are MWCOG standards not included?	Incorporate MWCOG standards.
	3-27	Aural Environment	X	Why do the Aural (Noise) policies not reference traffic noise and outdoor commercial noise?	Aural Environment (Noise) policies should reference traffic noise, and outdoor commercial noise.
	3-27	Lighting	X	Should this section be called Lighting and Night Sky?	Add an action that references lighting standards to protect the health of wildlife.
MISSING from Natural and Heritage Resources	3-26	Policy 1, Strategy 1.1	X		Add the following action: Use integrated management strategies to ensure strong coordination within internal organizations, including and adequate number of natural resource-trained staff in key County departments; between local, regional and state agencies; and with partnerships, regional alliances and non-profits such as County Planning Department, PRCS, Public Works and Utilities, Economic Development, land preservation and watershed management groups.



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Chapter 4: HOUSING					
Section/Heading Policy/Strategy/ Action #	Pg #	Plan Text / Paragraph Reference (Optional)	Not Present	QUESTION(S)	COMMENT/INPUT/ RECOMMENDATION
Vision/Introduction	4-1			How does this chapter reflect and support the stated goals and positions of current residents of the County as provided during Public Input Sessions 1, 2 and 3?	The Chapter presents a serious danger to undermining the entire Plan. Development interests can take the policies and text of the Housing Chapter as a rationale to break open the Transition and Rural Area to tract housing.
	4-1	<i>During much of the first two decades of the 21st century, Loudoun County was the fifth fastest growing county in the country.</i>			There should also be a reference to the regional context. Loudoun has had the most growth within the DC Metropolitan region for most of the first two decades.
	4-2			(pp 4-2) Shouldn't the Introduction clarify that Loudoun faces a market demand which if fully permitted would overrun the spatial policies of the plan?	With limited land available priorities need to be established so that public facilities are not overwhelmed and the quality of life of the current residents is not compromised.. (pp 4-2) Vision: Delete “-for all people who want to work and live in Loudoun County” and change “Provide” to “Encourage through public/private cooperation housing options....”
Trends & Influences				Why does the draft plan emphasize high density urban millennials over the Public Input Session's stated emphasis for low density suburban family orientation?	Need to recognize Loudoun's previous plan was for a low density suburban family oriented development which in the new Plan the emphasis on high density urban millennials.
			X	Why is there no reference to the distribution of DU's by type and location to the Spatial Areas?	
			X	Why is the role of the public sector (County) and the private sector not identified?	
High Cost of Living & Housing	4-3			How can the problem of “housing burdened” households be set in a National and Regional context with better description of some of the obvious reasons that it exists?	"Housing burdened" households is not a problem unique to Loudoun and Loudoun cannot solve the problem using local resources.
					New housing units and families create demand for jobs to service this new growth in retail and services and a large majority of those jobs are low paid so a cycle develops in which more housing (including affordable housing) creates more needs for “affordable housing.”



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	4-3			Why does the table include 2015 (i.e., outdated) data? This data is kept current by the Dulles Realtors Association.	Include more current data.
Limited Supply of Available Land					
Housing Demand & Inventory	4-4			What data and/or statistics describe the present housing situation and support projections of future housing?	The present draft outlines a need and policies to accommodate market demand and for all ranges of housing which is total unrealistic.
	4-4			What hard data supports "Housing Demand and Inventory?"	Note: With the By-right and Pipeline Loudoun has ample housing units to cover the next 10 years so a reassessment might be called for at that time.
Changes in Typical Households	4-4			Was it recognized/acknowledged that all the Changes in Typical Households is opinion based on metropolitan areas and is not Loudoun specific?	The Plan should recognize that the private sector will be sensitive to alternative life styles and housing types and respond without a County role.
Housing Impacts on Gov. Services & Units Affordable by Design	4-5			Why does the plan not reference current County programs and define what other support the County is willing to give to the Private Sector to develop more affordable units?	The Affordable Housing text is totally inadequate.
Policies, Strategies, Actions				Why is there no mention of the current programs for Affordable Housing nor policies supporting their expansion (loan program etc)?	The Policies, Strategies, and Actions are in need of a total rewrite.



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Chapter 5: ECONOMIC DEVELOPMENT					
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Vision	5-2	<i>A diverse and globally competitive Loudoun Economy</i>		Does this Vision statement imply that Loudoun County should have a diverse and globally competitive economy without regard to the impact this type of commercial/industrial development may have on the quality of life and environment in the County?	Suggested refined Vision statement: 'A diverse and globally competitive Loudoun economy that enhances the quality of life and environment.' Quality of life and the environment are played down in the whole chapter and placing this type of language up front in the vision statement would better balance the vision.
Introduction	5-2	<i>Loudoun's sustained economic growth generates significant local tax revenue from businesses that supports quality schools, parks, public facilities, infrastructure and low residential tax rates.</i>		What are the actual tax revenues by targeted business clusters for 2017 and what are the projected tax revenue from businesses for the out years of the Plan?	In order to size the amount of economic growth required in Loudoun County, details on current revenue streams required now and in the future would help size commercial/industrial growth. This would provide the citizens and the Supervisors with some measurement of what to expect from an economic growth perspective. Too little growth will present fiscal problems while too much growth could dramatically impact quality of life and environmental considerations. The available space for housing and infrastructure is finite, so sizing the economic needs will avoid creating too much demand for growth and avoid having a mismatch of housing to workforce.
			X	Why was a baseline of existing data on the present economic base and employment distribution not included, along with the percentage of workers living and working in Loudoun?	Increasing this total should be an objective.
	5-2		X	The term "Economic Development" is not a well-understood concept to the average citizen. The 2000 RGP included a definition of the concept. Can this be included in the EL 2040 Plan for clarity?	RGP, Ch. 4, p.1, ¶ 2: "Economic development is the collaboration of public, private and nonprofit sectors to deliver a community with a high quality of life and an attractive business environment. An effective economic development process yields two products: high quality jobs that produce incomes for a high standard of living, and the public and private financial resources necessary to keep the community's asset base healthy. These assets are the real wealth of the community and include the intellectual, educational, entrepreneurial, technological, environmental, social, heritage and natural resources."



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Background	5-3	<i>"The Community's Plan for a Thriving and Sustainable Economy" – five goals, #4) develop an innovative rural economy</i>	X	These same five goals were referenced in the 2000 RGP, however #4 omitted the remainder of the phrase. Can this language be reinserted?	ADD back: "Develop an innovative Rural Economy that is compatible with Loudoun's rural character."
	5-3	<i>"The Community's Plan for a Thriving and Sustainable Economy" – "Loudoun's competitive advantages"</i>	X	In the 2000 RGP the six competitive advantages were defined and described, for citizens and the County to refer to for background and evaluation. The description of Quality of Life is referenced only twice in the EL 2040 Ch. 5, but was a high-ranked criterion during public input. Can these descriptions be updated and added back?	RGP, Ch. 4, p.1, ¶6 D. Quality of Life Loudoun County's quality of life is a key competitive advantage that is vital to the economic base. The County offers a distinctive sense of place, a beautiful rural environment of mountains, valleys, farms, estates and open space, charming small towns and existing villages, and well-planned suburban communities in proximity to employment corridors. Maintaining these distinctive places and their accompanying sense of community are important advantages for Loudoun County in a competitive marketplace.
Background	5-3	<i>"The Community's Plan for a Thriving and Sustainable Economy"</i>	X	Although EL 2040 references this report, why did the draft omit the "four key economic development principles" outlined? These points reflect public requirements reflected during Round 1 and 2 Public Input sessions. Can they be reinserted for completeness, and to clarify the importance of "quality of life" more clearly in the EL 2040 draft?	RGP, Ch. 4, p.2, ¶5: "This economic development strategy addresses four key economic development principles: 1) Maintaining Loudoun's high quality of life, which includes providing excellent schools, affordable housing, recreational opportunities, adequate infra-structure, efficient public services and, aesthetically pleasing open space;2) Diversifying the local economy so that it is not overly dependent on a particular industry sector; 3) Managing growth so that the County can provide adequate public services and continue to be fiscally sound; and 4) Coordinating with Loudoun's incorporated Towns and rural economic sectors to achieve balanced policy making, planning and monitoring, for the successful implementation of the economic development strategy."
Targeted Cluster Strategy	5-3			Why were each of the Targeted Cluster Strategy segments not discussed in more detail separately?	Targeted Cluster Strategy should discuss each cluster separately and identify its market potential, land requirements, free standing or in mixed use, potential job creation. Etc.



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			X	Can a better base Map of Economic Activity Zones (not a satellite view) be included in order to show the actual spatial areas more clearly?	The Silver Line Urban District needs to be singled out and its potential contribution to the economy highlighted.
Trends & Influences	5-5			Trends and Influences describes work items that were done, but why were none of the findings included?	Facts are needed here.
Local Opportunities & Challenges	5-5	<i>Northern Virginia has an exceptionally high concentration of tech talent, as measured by the number of civilians employed persons in computer and mathematical occupations - more than Seattle and comparable to that in the entire San Francisco/Silicon Valley area.</i>		What are the current population estimates by major skill category in the County and what is the estimated needs in the out years of the comprehensive plan?	The plan makes blanket statements without providing any detail. The detail is required to properly size the workforce challenge to see if the challenge is achievable and realistic. Local Opportunities and Challenges is jumbled and missing components (for example, land availability, development of markets overtime, transportation and traffic etc)
Workforce	5-5	<i>Loudoun County is home to seven institutions of higher education providing undergraduate, graduate, and continuing education opportunities</i>		The 2000 RGP named the six institutions of higher learning at that time (p. 4, ¶ 5). Which is the seventh?	It may be helpful to remind citizens who the seven institutions are by name in EL 2040.
Globalization					
Digitization	5-6	<i>Digitization of the local government development process is becoming widely accepted, which helps businesses start and expand easier and faster. Electronic plan submittals, business license portals, and online permit or entitlement tracking increase accountability and provide more certainty for the business community.</i>		A goal of improved digitization of local government development process is (or should be) improved enforcement monitoring and tracking -- for the health, safety and welfare of the public. Can this be addressed as a benefit of digitization in EL 2040?	
Tourism	5-6		X	The description of "Tourism" in EL 2040 only highlights it in relation to Economic Development, instead of impact to the County and policies across the board. The 2000 RGP had more inclusive language; can this be added back? Tourism text seems very inadequate; can additional data, and potential growth information be provided?	RGP, Ch. 4, p.9, ¶ 5: The tourism industry reinforces the County's commitment to aesthetics, developing infrastructure, preserving attractions, and implementing land use plans to further differentiate Loudoun County from neighboring jurisdictions. RGP, Ch. 4, p.10, ¶ 3: A major concentration of visitor attractions are located in the Rural Policy Area and Towns; the preservation and nurturing of which is fundamental to the future of the tourism industry and its contribution to the rural economy



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Demographics	5-7	<i>In general, millennials are unique because of technological aptitude and reliance, propensity towards tolerance, and high educational attainment (Pew Research, 2015).</i>		Why are Pew Research statistics from 2015 being used in the EL 2040 draft when more current statistics are readily available from Pew Research? Why use dated data for a new plan?	Demographics focuses solely on Millennials. This cohort will marry and have children and seeking alternative housing to apartments in walkable communities.
	5-7			Large chart about a national cohort is outdated and not very useful in Loudoun Plan. Can this be deleted?	
Policies, Strategies, Actions	5-7	<i>Unless otherwise specified, the following policies, strategies, and actions apply Countywide</i>		The Rural Policy Area contains 67% of the total land area for Loudoun County, and has significantly distinct economic development goals, strategies and actions. A number of the EL 2040 Econ Dev. Policies included do not adequately apply to the Rural areas. Can these be better defined/clarified?	RGP, Ch. 4, p.9, ¶ 2, #12: Limit the establishment of the Rural Commercial (RC) zoning district . . . Considerations:" a. traffic safety, b. compatibility with surrounding land uses and zoning, c. appropriate location, d. limit strip commercial development.
Policy 1, Strategy 1.3	5-7	<i>Catalyze start-ups and entrepreneurial growth by providing quality resources</i>		What does this statement mean?	Better definition and specifics of what the "quality resources" are would make it clearer,
Policy 1, Action C	5-8	<i>Provide assistance with regulatory process and streamline when possible using electronic plan submittals and online portals to get clients to market more quickly, provided all public safety, health, and welfare regulations are met.</i>		Does this statement imply that some County regulations may be 'streamlined' to rush a developers effort? How will this be balanced with citizen health, safety and welfare concerns?	Believe this item's language can be cleaned up to correct possible mis-reading of the meaning. It is good to help people get through a process while maintaining and following proper procedures.
Policy 1, Action D	5-8	<i>Create mechanisms for the rural economy to maintain its status as a regional agricultural leader and local advantage.</i>		Only mention of rural economy? Suggest referencing that rural economy discussion is within the Rural Policy Chapter. Can some examples of mechanisms be provided and also some limitations on 'mechanisms' ?	The action could be written this way: "Create mechanisms for the rural economy to maintain its status as a regional leader and local advantage that are in keeping with the rural character, environment and quality of life in the rural area. Also, in this action item specific actions should be offered as examples such as support for easements, TDR's, support for leasing pieces of large properties to allow those that do not have monetary resources to purchase large tracts to farm on smaller properties."



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Policy 1, Action F	5-8	<i>F. Strategically use economic incentives as needed for attraction and retention.</i>		What criteria will be required to provide "economic incentives?" What State programs and funds can/will be required?	"Economic incentives" should be discussed in text and policy should deal with criteria for providing incentives and call for maximizing use of State programs and funds.
Policy 2, Strategy 2.3	5-8	<i>Be flexible, customer focused, timely, and open to interpretation in review and approval of commercial or mixed-use projects to keep pace with business innovations and reduce time to market.</i>		Can this strategy be written in a more balanced manner in order to represent the developer, County, Residents in a more even handed manner? At a minimum, can compliance with Zoning Ordinances for health, safety and welfare be referenced?	Text is wide open and fails to take in to consideration the public interest, compatibility of surrounding area. These kind of policies show no respect for the Plan and the context it provides. Recommended language: "Act in a manner that is customer focused, timely, and shows a willingness to listen to various interpretations in review and approval of commercial or mix-use project to keep pace with business innovations and reduce time to market while keeping the public , County and comprehensive plan guidelines om mind."
Policy 2, Strategy 2.5	5-8	<i>2.5. Support a diversity of available commercial products when planning land use to improve attraction of a multifaceted business base.</i>		It's unclear what this strategy means. Can it be re-defined with clearer, more actionable and enforceable language?	
Policy 2, Action B	5-9	<i>Streamline the process for amending the Comprehensive Plan to allow for flexible and timely response to evolving market conditions and technological innovation and to reduce time to market</i>		Because of direct conflict with the CPAM process, can this action be deleted? Isn't the purpose of the Comprehensive Plan to create long term guidelines to avoid instability in the County? At a minimum, can compliance with Zoning Ordinances for health, safety and welfare be referenced?	Delete this action because this policy misunderstands the fundamental value of a CPAM Planning Process that provides ample time for consideration of all aspects of a modification and allows the public to participate. It is felt that the current rules for changing the Comprehensive Plan are quite adequate to allow the flexibility required in the marketplace. Allowing easy changes to the plan would drastically reduce the purpose of the Plan and could be deemed to circumvent the will of the people.
Policy 3, Strategy 3.4, Action C	5-9	<i>C. Incentivize construction of attainable workforce housing using density bonuses, fee waivers, revolving loans, or assistance with required infrastructure.</i>		Why is this action included here instead of in the Housing Chapter?	Delete this action here and consider if needed in the Housing Chapter.



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Policy 5, Strategy 5.1	5-10	<i>Collaborate with Visit Loudoun to support the development and enhancement of tourism and hospitality infrastructure including hotels, bed and breakfasts, event facilities and cultural attractions,</i>		Should the Economic Staff also collaborate with the public (especially those that may be impacted by any actions) regarding actions related to tourism development?	The language for the strategy could be changed as follows: "Collaborate with Visit Loudoun and the appropriate local residents and organizations to support the development and enhancement of tourism and hospitality infrastructure, including hotels, bed and breakfasts, event facilities and cultural attractions." This would assure all parties are involved since this type of development can impact the quality of life for everyone.
Policy 5, Strategy 5.1	5-10		X	The current EL 2040 plan focuses only on the tourism efforts related to business interests, rather than focusing on creating a sustainable economic community. The 2000 RGP Ch 4, pp. 10-11 included awareness of environmental and social considerations for tourism in addition to economic. Can these be added back?	RGP, Ch. 4, pp.10-11, ¶ 5: "1. The County, in cooperation with [Visit Loudoun] supports the promotion of Loudoun County as a tourist destination and recognizes the importance of existing and new communities being well planned, well designed, and aesthetically attractive. 2. The County will protect, expand, and enhance Loudoun's historic, cultural and natural resource-based tourism industry. 6. The County will promote Parks and Recreation and Town sponsored tourist events."
MISSING:			X		A holistic approach that integrates econ development, protection of natural assets and social welfare is missing from the Vision and from the tourism policy



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Vision	6-2	<i>County residents will benefit from high quality, efficient, and environmentally sensitive infrastructure systems supporting County growth management goals and providing innovative services to the community.</i>		Why was the Vision statement written as a “conclusion” and not a commitment?	Revise to: "County residents will benefit from high quality, efficient, interconnected green and grey infrastructure systems supporting County growth management goals and providing innovative services to the community."
Introduction	6-2			Where is the Loudoun Water Plan available for public review?	Introduction: Statement about Loudoun Water Plan, but does not state what it contains or how it can be accessed.
Fiscal Planning & Budgeting	6-2			How do existing constraints effect the land use proposals of the New Plan?	Fiscal Planning and Budgeting is a very summarized description of what it consists of, but does not state any of the outcomes to be achieved such as debt limits, existing commitments of the 10 year Capital Needs Assessment or the Six Year Capital Improvement Program.
Public Facilities	6-3			Why is there no mention of proffer policies? What facilities in what policy areas will be at Taxpayer Expense?	
Utilities and Infrastructure	6-3				
	6-3	<i>By 2040, Loudoun Water's customers may require up to 90 million gallons of drinking water every day. This would represent a 40 million gallon per day increase from the customer demand in 2017</i>		What is this estimate based on other than residential and commercial growth?	This implies a huge increase (doubling) of residential population and commercial . This estimate should be questioned. Consider the potential for conservation techniques and technology to lower future demand per household., e.g., recycled gray water.
	6-3	<i>It involves withdrawing river water when flows and quality are acceptable and storing the water in retired rock quarries, initially storing at least one billion gallons of water and ultimately more than 8 billion gallons of water in quarries.</i>		What analysis has been done to support the county's ability to withdraw that amount of water from the Potomac River and confirm that sufficient water will be available to meet the growing needs?	



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	6-3		X	Why are no land fill estimates or requirements for expansion included?	There are no estimates on whether or not the land fill will need replacement or expansion.
	6-3	<i>Open space assets as defined in this chapter include greenways and trails and open space easements.</i>		Can the definition of open space assets be expanded to include more than greenways, trails and easements?	The green infrastructure is an open space asset. Green infrastructure is actually our network of natural resources (trees, slopes, floodplains meadows, wetlands) that delivers cost-effective stormwater management, and flood and drought mitigation; increases property values, reduces capital outlay, energy use and carbon emissions, sustains air quality, clean water and healthy soils for food production, supports biodiversity and enhances quality of life. INSERT: "Open space assets as defined in this chapter include greenways and trails and open space easements. These assets make up much of the green infrastructure of the county.... "
	6-4	<i>There are over 70,000 acres of land, equating to approximately 21 percent of the County, protected in private conservation easements and another 3,600 acres of land owned and managed by Homeowners Associations (HOA).</i>		Section should provide further information on the following: What are the current proportions of this land in various uses (agricultural, parks & rec, school related, etc.)? What is the goal for increasing this amount?	Develop a department within the government to oversee, coordinate, and prioritize acquisitions and dedications of open space and trail systems.
	6-4	<i>PDR program is unfunded.</i>		Is the plan going forward to seek funds for this program? How much?	
	6-4	<i>TDR Program</i>		Is anybody working in Planning working on the program?	Appoint a commission to develop a TDR program and how it will relate to proffers.
	6-4	<i>"County standards for facilities...have to be more flexible..."</i>			Disagree. Environmental standards, including LEED certification, smaller footprints and native plant policies, should be included, to set the bar for sustainability in our County.
	6-5	<i>The County's rural economy is hampered by the lack of a comprehensive broadband network available to all residents and businesses.</i>		How will the policies, strategies, and actions actually achieve a comprehensive broadband network for all residents and businesses?	



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	6-5	<i>Urban development patterns along the Silver Line . . .</i>		Is it realistic to assume mixed use centers along the Silver Line Stops? The large data centers create geographic barriers the keep the pattern from evolving in an efficient manner, as well as the Dulles Noise Overlay district will limit long term residential development.	Some of the best land is being purchased and planned and zoned for data center development. Due to the Airport noise overlay zone and the presence of large data centers around the Silverline stations, planning and, zoning policies need to be reexamined in order to achieve economy of scale for pedestrian friendly, mixed use urban communities.
	6-5	<i>Multi-story schools, shared space in mixed use buildings, and overall more compact footprint are necessary with the urban walkable communities.”</i>		Is this an acceptable future for Loudoun residents?	
	6-5	<i>Par. 2; last sentence As the County urbanizes and more fully utilizes its suburban land base, it will have to rely on the natural resources and preservation of open space to minimize the increased runoff and pollution.</i>		Requires clarification?	Replace with: "As the county urbanizes and more fully utilizes its suburban land base, it will have to utilize more LID-type green infrastructure practices in addition to preservation of natural resources and open space to minimize the increased stormwater runoff and pollution that comes with higher density development."
	6-5	<i>Paragraph 3</i>		Stormwater utility fees required for mitigation?	Add "The County will consider instituting a stormwater utility fee to mitigate the impacts of increasing impervious surfaces."
	6-5	<i>Paragraph 3</i>	X		REVISION TO FIRST SENTENCE: As part of its strategic planning efforts on growth management, the County will be expanding discussion of net impacts, including capital needs and costs, of individual projects on Countywide infrastructure, and tools to manage the timing and pace of growth more effectively.
	6-5		X	Why is there no serious discussion of schools and future school demand. Only mention is under "Trends and Influences?"	
Policies, Strategies, and Actions	6-5		X	The introduction talks about increased water use and the need to mitigate impacts from development, so why aren't there any policies regarding sustainable facility standards listed in this section?	



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Public Facilities	6-5	<i>Action A. "Expedite the approval of capital facilities by establishing performance standards that would eliminate the need for legislation review"</i>		What about the numerous historic examples of where the public has been opposed to certain capital facilities for various reasons?	This is another one of several "actions" that call for the simplification or elimination of the legislative process which means the cutting out of the public from having a voice.
	6-5	<i>Action A</i>		What kind of standards?	Needs to be more specific. What kind of standards? Add LEED standards, native plant use for landscaping.
	6-5	<i>Action B: Support the School Board acquisition of needed sites through the fiscal planning and land development processes.</i>		Has it been determined how many schools and how many sites? What is the estimated cost?	
	6-6	<i>Action E "Evaluate Commission Permit applications for County facilities on the character and extent of the maximum development potential of the site in order to permit future expansion and colocation without requiring additional Commission permit approval under Code of Virginia Section 15.2-2232.</i>		Why is the EL2040 creating policies with the direct purpose to cut the public out of the approval process?	Regarding cutting people out of the process, if this were in place Loudoun would now have a massive data center on the top of the Short Hill mountain.
	6-6	<i>Strategy 1.3 Strategically locate facilities where they can serve the community efficiently and effectively.</i>		What are the specific accessibility and response time goals for each type of facility that will be used to assess success in this strategy?	The test of a strategy should be does it make a choice between two or more possible outcomes. When the Strategy is just a totally obvious comment should it be included in the Plan. Actions refer to generalities that make success or failure a matter of opinion. Accessibility and response time goals need to be included in the plan. There is no reference to school locations, numbers required, standards for length of bus trips, etc.
Open Space	6-7	<i>Action C</i>			Add "local groups" before "and the Incorporated Towns".
	6-7	<i>Action E.</i>		How far should they go in support of rural economy uses?	. . . that are subject to development standards and prohibiting non-agricultural commercial land uses that have no direct connection to or reason for being in the RPA.



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	6-7	<i>Policy 2: Retain the County's unique combination of urban, suburban, and rural communities by using useable open space to protect natural resources and habitat, to create a network of high-quality active and passive recreation spaces, and to delineate our built environments.</i>		Why is this the only policy in the entire plan that references parks and open space? Suggest additional Policy statements that would also include subtending Strategy and Actions.	ADD: Policy 3: Expand and/or increase resources for facilities and parkland [Note: this is consistent with current Loudoun County Parks Strategic Plan-2016-2018].
	6-8	<i>Policy 2</i>		Is the protection of nature only reference in the green infrastructure chapter as part of development? What are our goals in protecting the natural state in the land areas that we do not develop?	Add Policy 4: Protect appropriate land areas in a natural state to ensure preservation of significant and sensitive natural resources. Strategy 4.1: Identify and acquire lands with significant natural resources including exemplary natural areas, large natural areas, areas connected to other protected lands, stream valleys and areas that buffer significant resources from disturbance and impacts. Strategy 4.2: Manage and protect significant natural resources throughout the county, in cooperation with other agencies, organizations and partners, by implementing ecosystem management principles, restoring degraded natural resources, linking major resource areas and supporting habitats essential to biological diversity, where possible. Strategy 4. 3: Manage wild populations to include vegetative resources and wildlife, including invasive species, through appropriate inventories, monitoring, education, planning, management and restoration to protect and improve the ecosystem function including increasing biodiversity of native species. Strategy 4.4: Grant easements or encumbrances on parkland only when a benefit to parklands and water quality is demonstrated.
	6-8	<i>Policy 2</i>	X	What is the intent of "useable"? Not all our natural resource areas should be useable by people. Do we want to "use usable" open space to include active recreation? Would that mean buildings? Then the space is no longer open. Open space should be limited to such as agricultural uses, not buildings. What about TDRs? How will the plan support funding for conservation easements?	AMEND: Policy 2: Retain the County's unique combination of urban, suburban, and rural communities by using open space as part of the green infrastructure, protect natural resources and habitat, [to] create a network of high-quality active and passive recreation spaces, and to delineate our built environments.
	6-8	<i>Actions A.</i>		Who will be responsible for this?	Add to A. . . .Develop a department for planning, facilitating and coordinating the links.



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	6-8	<i>Policy 2</i>		Why is there no mention of historical and cultural protection in this park section? Many residents want parkland dedicated to cultural and historical assets as well.	Add Policy 5: Protect and preserve significant cultural resources on parklands. Strategy 5.1: Determine the significance and appropriate preservation options for cultural resources that are proposed for inclusion in the integrated park system in accordance with the criteria for the U.S. Department of Interior National Register of Historic Places and Loudoun County's Historic Preservation Commission. Strategy 5.2: Protect significant cultural resources, including archaeological sites, historic properties, buildings, structures, districts, landscapes, cemeteries and artifacts from degradation or damage and destruction. Strategy 5.3: Consider alternatives, in addition to fee-simple acquisition of cultural resources, such as the establishment of protective easements, to ensure preservation, stabilization, restoration and appropriate site planning and development.
	6-8	<i>Strategy 2.1: Use contiguous linear parks, connected trails, and natural open space corridors to improve public access to open space, encourage healthy lifestyles, and link destinations throughout the County.</i>		Should not Parks be treated under separate policy statements from Open Space statements? We want both, parkland and conservation of open space which may often be in two different places. Suggest additional strategies to achieve success.	Add this as Strategy 3.1: Plan, acquire, develop, and maintain various types of parks through the Loudoun County Parks and Recreation and Community Services (PRCS) in conjunction with other public providers and the private sector and in accordance with PRCS's strategic plan
	6-8	<i>Action C. Ensure that new developments extend identified trails and greenways into and through their projects during the development review process with the intent of creating a seamless network of public trails that is consistent with the County Master Plan.</i>			Awesome!
	6-8	<i>Action D. Establish and maintain useable levels of public open space in all residential and mixed-use communities.</i>		What are the benchmarks or limits for useable levels?	Useable levels of open space should be defined as included in the "Place Types." Set benchmarks or limits for useable levels.



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	6-8	<i>Action F: i-iv</i>		Why is the "Open Space Preservation Program" not defined anywhere in the draft plan?	Nor does the term turn up in searches of the County's website and Google. Yet the draft's implementation matrix contains an item that begins with "Continue the Open Space Preservation Program..." This section is peppered with "equivalents" that aren't equivalent, including cash in lieu of open space. Current Suburban Policy Area protections have been diluted.
	6-9	<i>Action F:iii Link modifications reducing on-site open space, buffer, or landscaping requirements with the provision of an equivalent amount of open space or an equivalent cash contribution towards the Open Space Preservation Program.</i>		What is the Open Space Preservation Program? Does it exist now?	Modifications reducing open space et. al. should require an alternative on site which is the equivalent to the reduction. If a developer can pay to a fund it will undermine the green infrastructure impact.
	6-9	<i>H</i>		What would the County or public gain by holding Conservation Easements that have Tax Consequences?	The County should not accept Conservation Easements that have Tax Consequences, but Co-hold with one or more of the existing Land Trust Organizations. Replace the first words, "Encourage protection", with "Protect."
	6-9	<i>I</i>			Strike this action.
	6-9	<i>Could replace I</i>	X	What Green Infrastructure Best Management Practices have been/will be included?	ADD NEW: Create a new program of Green Infrastructure Best Management Practices to better manage stormwater and improve water quality. Consider related mechanisms to provide stormwater financing for the County to meet Federal water quality standards through the MS4 permit.
	6-9	<i>Open Space Policies</i>	X	What are the overall goals for aggregate open space for the county?	Need a policy that commits to overall goals for aggregate open space for the county (including space under easement and open space required by existing zoning). 1. Goals should be set for each of the defined areas - urban, suburban, transition, and rural. 2. Actions should include annual updates on overall open space status and requiring analysis of the impact of zoning changes such as creation of JLMAs on planning area and overall open space commitments.



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	6-9	<i>Open Space Policies</i>	X	Why is the committed proportion of land in protected open space so low at 21%?	Need a policy that commits to increasing the proportion of land in protected open space from 21% to 30% and achieving specific goals for protected open space in each of the defined policy areas: "Actions should include annual reports on total protected open space status and funding for the PDR program."
	6-9	<i>Open Space Policies</i>	X	What are the goals for different types of open space?	Not all open space is of equal value to the public or as component of green infrastructure. Add "General open space policies should include goals for different types of open space: public active recreational, public conservation reserves, school fields, agricultural, private recreational, etc."
	6-9	<i>Open Space Policies</i>	X	Why is there no mention in the Policy Section of the Comp Plan of Stream Valley Parks and Trail Corridors in the Plan yet they appear on the 2040 Trails Map found at the end of Chapter 6 - Fiscal Mgmt & Public Infrastructure? Stream Valleys are only mentioned as part of Open Space Conservation Easements not parkland.	Add Strategy 3.2: Establish and manage an integrated network of Greenway Parks, referred to as "Emerald Ribbons" within the County to conserve open space, protect sensitive environmental and cultural resources including wildlife habitat, riparian corridors, water quality, archeological and historic sites and aesthetic values, to control flooding and erosion, and to provide continuity of non-motorized access between places where citizens live, work and play.
	6-9	<i>Open Space Policies</i>	X	Does the County care about balancing nature's requirements with human requirements on the precious resources the County now has?	Add this as Strategy 3.3: Provide a balance of quality recreation opportunities with the protection and preservation of sensitive natural and cultural resources.
	6-9	<i>Open Space Policies</i>	X	Does the County have standards and measures of success to evaluate progress against goals?	Add this as Strategy 3.4: Use an agreed upon Standards and Criteria for Establishment of Park and Recreation Facilities (preferably attached to Comp Plan as an appendix e.g. ratios of park acreage to population, Trail mileage per population, etc.) as a guide for the planning and provision of parkland and recreation facilities to adequately serve the county's current and projected population.
	6-9	<i>Open Space Policies</i>	X	Can the plan tie together the goals of more parks and trails with the need for protection of open space? Can the plan locate open space next to park lands?	Add this as Strategy 3.5: Enhance existing park experiences and resource protection opportunities through acquisition of lands adjacent to existing parkland, wherever feasible.



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	6-9	<i>Open Space Policies</i>	X	Loudoun County funds NOVA Parks annually. Why is there no mention of this relationship anywhere in the plan?	Add this as Strategy 3.6: Endorse the efforts of the multi-jurisdictional Northern Virginia Regional Park Authority (NVRPA) to fulfill its purpose: to carry out a long-range open space plan for Northern Virginia, through a cooperative system of regional parks, to supplement and enhance local park systems in Northern Virginia.
	6-10	<i>J. implement a local density</i>		How should it be done?	Appoint a commission to develop a TDR program
	6-10	<i>Sewer and Water, Strategy 3.1, Action</i>	X	What are the best management practices in the Reservoir Protection Area to protect drinking water quality?	ADD NEW D. Require a higher level of open space and green infrastructure best management practices for all development in the Reservoir Protection Area to protect drinking water quality.
Sewer & Water	6-10	<i>Strategy 3.2</i>		What will prevent water and sewer service areas from being extended beyond existing boundaries?	Service areas for water and sewer have already been defined. Add language to ensure that water and sewer are not extended beyond existing boundaries.
	6-11	<i>Strategy 3.3 Action B</i>		What studies can/will be done on the impact on surrounding wells for large ground water users?	Include a statement on requiring a study of the impact on surrounding wells for proposed large potential ground water users.
	6-11	<i>Strategy 3.4 Action B</i>			Strike "or equivalent protection."
	6-12	<i>Strategy 3.7 Action B i.</i>		Could this be construed to open more economy uses?	. . . that are subject to development standards and prohibiting non-agricultural commercial land uses that have no direct connection to or reason for being in the RPA.
	6-12	<i>Strategy 3.6, Action C.</i>		What will educate the public on improper groundwater uses?	ADD TO C: Discourage the use of groundwater for irrigation and other nonessential purposes. Provide homeowner educational materials on this and related well and septic safety for residents in the Rural Policy Area, particularly in the Limestone Overlay Zoning District.
	6-12	<i>Strategy 3.6, Action D.</i>		What enforcement would be applicable for only "recommending" monitoring, versus actually "monitoring?"	Replace "Recommend monitoring" with "Monitor". NOTE: Develop monitoring partnership for groundwater and surface water....
	6-12	<i>Strategy 3.6, Action G</i>	X		ADD: G. Prohibit the placement of wastewater treatment facilities on Rural Economy or Open Space lots to preserve the intended functions on such lots.
Towns/JLMAs	6-13	<i>Strategy 4.1, Action E.</i>		. Doesn't this contradict strategy 3.6, Action A?	Strike. Doesn't this contradict strategy 3.6, Action A?



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Solid Waste Management					
Electrical	6-14	<i>Electrical, Policy 6, Strategy:</i>		If not implemented correctly, couldn't this become a threat to the Rural Tourist Economy?	Encourage local property owners to use solar and wind energy, but do not allow commercial development of these uses. (alternative: only with sharply drawn performance criteria). They could be a major threat to the Rural Tourist Economy.
	6-14	<i>Strategy 6.1, Action B.</i>			Begin the sentence with, "In areas where the green infrastructure will not be disrupted,"
	6-14	<i>Strategy 6.1, Action E & F.</i>	X	What about an updated County Energy Strategy?	E. Encourage residential solar through a residential PACE program. F. Adopt an updated County Energy Strategy.
	6-14			How would one emphasize clean, environmentally friendly sources of energy?	Perhaps become a leader in balanced energy, especially considering the very high usage of power in data centers.
Communication	6-14			How will the plan support development of high-quality telecommunications network to serve the community, without compromising the mountain ridges with invasive towers?	
	6-15	<i>Policy 7: Strategy 7.1: Action C:</i>		What about tower design?, They should be unique to the location.	. . . that are subject to design standards that conform to the surrounding area and that avoid ridgelines.
	6-15	<i>Fiscal Management, Policy 8, Strategy 8.1.</i>		Should the "balance" be a target of say 70/30 residential to commercial or some alternative?	The implication in the draft plan is that revenue will be "balanced" by pursuing development overall.
	6-15	<i>Policy 8: Strategy 8.1: Action A:</i>		If Loudoun County is so successful with having high paying commercial/industrial uses such as data centers, that require less employees so less population to support -- then why do we have one of the highest tax rates in Va?	Provide a revenue vs. cost analysis by industry sector vs. the residential sector.
	6-15	<i>Policy 8: Strategy 8.1: Action D:</i>		This would be a powerful and unpopular request -- What would compel the BOS to ask for such authority?	Authorize Staff to seek authority
Fiscal Management	6-15	<i>Strategy 8-1</i>	X	How will growth be managed in an orderly and fiscally responsible manner?	INSERT NEW ITEM BEFORE ACTION E: Develop growth management program to prioritize growth in intended growth areas in an orderly and fiscally responsible manner.



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	6-16	<i>Policy 8: Strategy 8.2: Action F, add ii.</i>	X	How could this calculation be used to establish the base value of a TDR?	In establishing a base value of a TDR, since there is no net gain in the number of new students, allow the school facility cost per student to be the basis of the value of a TDR. The receiving entity could then go to the pool of available TDRs (to be kept by the County Staff) and offer to buy from the transmitting land owner at a negotiated price.
Fiscal Management	6-16	<i>Action G</i>			Begin the sentence with, "Develop and refine Capital Facility Standards- the type, acreage, size, energy efficiency and native plant use in landscaping of future capital facilities..."
	6-16	<i>Strategy 8.2., Action I: Ensure that the users or beneficiaries ...finance an equitable portion"</i>		Given current proffer rules and lack of grounds for public facilities how will this action be implemented?	
	6-16	<i>Strategy 8.2, Action J</i>		Should the impact list be related to standards?	
	6-16	<i>Policy 8: Strategy 8.2: Action J iii.</i>		What happens in the case of changing interest rates?	Add: and based on anticipated changes in interest rates.
	6-18	<i>Strategy 8.3, Action H: "The County WILL extend the EXISTING SMALL AREA PLANS to encompass the Urban, Suburban, and Transition Policy Areas and the residential areas of Leesburg JLMA consistent with planned land use."</i>		This strategy extends Existing Small Area Plans, but does not provide any description or land use. Why?	This can only be done according to the County Attorney by eliminating the Transition Area and calling it a Suburban Policy Area. Further, the present draft of the Plan does not provide any description or land use for the "existing small area plans."
Fiscal Management	6-19	<i>Strategy 8.3. Action H</i>		How can the county manage growth effectively with such expansive small area plans?	AMEND: H. The County will reduce the existing Small Area Plans down 1/2 mile radius of the Silver Line Metro Station s to encourage growth in a phased and orderly manner according to County priorities. This designation will be periodically reviewed to determine the need and location of prioritized growth.
Fiscal Management	6-19	<i>Strategy 9.1 through 9.4 should have lettered Actions</i>			
	6-19	<i>9.3 i</i>		Any amendment, up or down?	ADD: zoning amendments increasing density are not anticipated



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Fiscal Management	6-19	Strategy 9.3 i and ii.		How can the county manage growth effectively by inviting growth in areas that should not be developed at higher densities?	STRIKE: i and ii
	6-19	9.3 ii		What if there is no change in zoning in Transition Area?	The planned density for the Transition Policy Area is implemented by the existing zoning pattern and zoning amendments are not anticipated increasing density are not anticipated.
	6-20	Box on "Incentives for installing Sprinklers could include:"		Why is the plan making this recommendation when it has been tried in the past and requires "No Parking" compliance to implement?	Reduction in road width has been tried and it requires "No Parking" which is then ignored and raises risks for all. Providing Development density credits on a public safety issue in a bad idea. Either require the sprinklers for housing outside the service time standard of the fire departments or not, but don't involve public policy options.
	6-20	Trails & Parks Map #2018-157		Are there adequate trails connecting to the planned Silver Line stations?	Double check this map for adequate trails.
Fiscal Management				What following proffer guidelines?	
Emergency Services					
Development Stds					
Map of Natural Resources					



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PHASE II: July 9, 2018

Revision of June 18, 2018 compilation to include:

- Questions, comments and recommendations for Chapter 7 (Implementation) of the May 7, 2018 Envision Loudoun 2040 Draft
- Transportation Chapter questions, comments and recommendations



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Chapter 7: IMPLEMENTATION					
Section/Heading Policy/Strategy/ Action #	Pg #	Plan Text / Paragraph Reference (Optional)	Not Present	QUESTION(S)	COMMENT/INPUT/ RECOMMENDATION
Vision					
	7—2	<i>The ability to monitor and evaluate the progress of Loudoun 2040 General Plan is crucial to determining whether the Plan is achieving the community's vision and goals.</i>		How will the County monitor and evaluate progress?	In order to monitor and evaluate progress, the goals must be specific and measurable; e.g., "achieve a 15% reduction in energy use" by a certain date.
	7—2	<i>The Loudoun 2040 General Plan presents opportunities and tools to allow for prioritization of key capital improvement projects needed as the County grows.</i>		How will the Plan address the public's request for increased park land?	Park land is a key need for which to plan as the County grows. Acquisition and maintenance of park land should be included in the CIP.
Implementation Matrix				What mechanism will the County use to provide a qualitative evaluation of the Plan based on reliable, agreed-upon indicators of progress?	Recommend inclusion or adoption of an independent set of evaluation measures such as the STAR Community Rating System.
	7—5, 7—6	<i>Policy language</i>			Replace "Encourage" with "Establish and maintain".
	7—5	<i>Continue to evaluate all sustainability efforts.</i>			Vague. List the specific efforts.
	7—6		X		What's missing: Native plant policies
	7—7	<i>Redevelopment, infill development and adaptive reuse projects and revitalization initiatives will enhance quality of life...</i>	X		What's missing: an action that plans for the dedication of a portion of infill and redevelopment to passive park land, so that all residents may have walkable access to such amenities.
	7—13	<i>Policy: Create environments where individuals can work, live and have convenient access to services, shops and recreation.</i>			None of the actions address the policy's stipulation of access to recreation.



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	7—14	<i>Once the County's financial obligation to the tax district is met, identify specific areas within the tax district where the County could consider residential development on a case by case basis that results in a net positive impact to the County.</i>		Is it financially sound to allow for consideration of more residential that will incur more facilities and services expenses for the County? Will more residential actually result in a net positive impact? If so, how will that be measured?	
	7—16	<i>Action: requirement #vi</i>			Change to: Enhance water quality protection along adjacent stream corridors and water supply reservoirs.
	7—17	<i>Policy : Limit residential development to protect the land resource for agricultural operations, rural economy uses and open space uses...</i>		Does the singular action, which is residential development related, adequately support the policy which addresses land as a resource, ag operations, open space and more?	
	7—19	<i>Develop County parks with trail networks, cross country courses, and equestrian riding rings...</i>			Add: passive park space
	7—19	<i>top of page: Adopt zoning regulations & development standards</i>		What new types?	Instead of nes, say "other types of rural business and agricultural businesses that are compatible with the policies set forth herein . . .
	7—19	<i>Bottom of page: Retain the Rural Economic Development Council (REDC)</i>		How will REDC adhere to guidelines of the Comp Plan?	Strike the word advocacy. REDC is an ADVISORY group to the BOS.
	7—21	<i>Bottom of page: Retain existing RC zoning and consider . .</i>		Will this keep <i>strip commercial</i> from developing?	State that the RC zoning is intended for implementation within the village setting and not for strip highway development
	7—24	<i>Chapter 3: Natural and Heritage Resources</i>	X		Establish a separate department to monitor the the open space easements, environmentally sensitive areas, green linkages, develop policy manual, and make recommendations to the Planning & Zoning Department for implementation
Chapter 3 Comprehensive Zoning Ordinance	7—24	<i>Policy: Provide protection for...</i>			Change to: "Protect..."



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Small Area Plans					
Capital Improvement Projects					
Design Guidelines					
					The Format of the Table is confusing and not very useful.
			X		The most important outcome is to construct the table around the “priority” and “schedule” so that it is clear what is to be accomplished during the “short term 1-5 year” “mid-term 5-10 year” etc.
			X		Listing the “Responsibility” as County Government over and over again is not very useful. The responsibility should rest directly with some component or sub-component of County Government.
					The “progress” column seems unnecessary on the table since presumably progress will be limited to just those few items chosen by the BOS for action. Progress would be better covered by an Annual Report on General Plan Progress to the BOS.
			X		At present the Matrix takes all the Policies and Actions from the various chapters and repeats them word for word. It leaves out “Strategies” As a result, a lot of the Actions appear to be fragments what are likely more comprehensive work items. For Example these Actions seem to be fragments of actions: “Update County regulations to support this development pattern.” “Develop flexible guidelines and regulations that support this policy” “Continue to evaluate all sustainability efforts.” “Establish incentives for sustainable development”



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			X		There should be a separation between various categories of Actions. Some are “studies” or “research” with defined time frames. Others are continuing activities which, once started, frequently provide criteria to evaluate applications which continue without an end date. Still others are the preparation of “incentives” to encourage the private sector to undertake some action which will have a direct or indirect “capital cost.”
Annual Report on Implementation to BOS & PC			X		There needs to be a commitment to the preparation for the BOS and PC of an Annual Report on the Implementation of the New Comprehensive Plan. It should include a data base on major activity during the year, such things as total housing permits issues, units approved by type and location, non-residential space developed and approved, parks and trails build etc. Also progress on the Implementation Matrix.
Small Area Plans			X		Small Area Plans: There should be a list of the specific small area plans to be prepared and their priority.
			X	What is the reason that items that were included in the Implementation Section of the 2001 Plan are not included in the draft?	Examples to add back: Proffer Policies Open Space and Density Transfer tools PDR’s, TDR’s Open Space Tax etc County/Town Annexation Policies and Agreement Design Guidelines (broader than those proposed in sections of new Plan)



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COUNTYWIDE TRANSPORTATION PLAN (CTP)					
Section/Heading Policy/Strategy/ Action #	Pg #	Plan Text / Paragraph Reference (Optional)	Not Present	QUESTION(S)	COMMENT/INPUT/ RECOMMENDATION
Introduction	1.1	<i>Forecasted facility demands</i>		What modeling is used to forecast demands?	The county's travel demand model predicts much higher future trips than other models recently used (e.g., by VDOT). This dictates expensive capacity increases, which then induces demand, and puts in place an unsustainable cycle of widening and poor land use planning. Consider shifting transportation planning away from a reaction to proposed sprawl development toward sustainable and strategic traffic improvements set forth in Visualize 2045.
Overall CTP Document	All				Great emphasis on Bike and Ped throughout the plan and we really appreciate the steps taken and helping the county move forward toward a more walkable and bikable county. The direct integration of the bike and pedestrian facilities with the vehicle plans associated with each Policy Area is a good approach.
Chapter 2 Transportation Network Goals	2.2	<i>2. A reliable and efficient multi-modal transportation network that manages the travel demands of the County while maintaining fiscal and environmental sustainability.</i>		Shouldn't this also specifically include mention of the reduction of Single Occupancy Vehicle trips in the goal?	ADD 2. A reliable and efficient multi-modal transportation network that reduces single occupancy vehicle trips and manages the travel demands of the County while maintaining fiscal and environmental sustainability.
Chapter 2	2.3	<i>Access and mobility, health and safety</i>		If the emphasis on access and mobility invites residents to travel longer distances, won't this have a negative impact on health, quality of life and safety?	Consider incorporating a Vehicle Miles Traveled standard for land use/transportation planning as that will have the greatest positive impact on access and mobility, health and safety.
Chapter 3	3.1	<i>Complete streets</i>	X	Is the county joining the National Complete Streets Coalition, and pledging to follow its guidelines?	There are a number of inconsistencies throughout the Plan that are not Complete Streets Policies. For example, at 3.20 it is stated that only median divided roads with four lanes or more should have pedestrian refuges. Consider formally joining Complete Streets and ensuring the Plan is consistent with those policies.
Chapter 3	3.1	<i>The introductory page--paragraphs 2 & 3'</i>		Wouldn't it be good to increase ease of reading?	Consider making points in paragraphs 2 and 3 into bullets.



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COUNTYWIDE TRANSPORTATION PLAN (CTP)					
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Chapter 3	3.2	<i>Peak weekday conditions</i>	X	Why does the plan chain improvement priorities to peak period demands, when this encourages more car use and is financially unsustainable given lack of transportation funds in an overdeveloped county?	Consider instead addressing transportation needs through adaptation of Visualize 2045 policies: Bring Jobs and Housing Closer Together, Expand Bus Rapid Transit Regionwide, Move More People on Metrorail, Provide More Telecommuting and Other Options for Commuting, Expand Express Highway Network, Improve Walk and Bike Access to Transit, Complete the National Capital Trail.
Chapter 3	3.2	<i>Level of service is an indicator of intersection operations</i>		Roundabouts vastly improve intersection operations and improve LOS. Why is this not reflected?	Consider a stronger policy for conversion of signalized intersections to roundabouts, which also will improve safety and fuel efficiency, and lower emissions and noise
	3.2	<i>Level of Service</i>	X	With a shift towards reducing vehicle miles travelled, wouldn't it be good to include this as a topic?	With an increased sustainability and climate focus, this is particularly relevant.
Chapter 3	3.4	<i>Traffic calming is intended to modify driver behavior, reduce vehicle speed to legal limits, increase safety for all users of the roadway.</i>		Since traffic calming is to encourage following traffic laws and to increase safety, shouldn't it be the policy for all roads that are not freeways?	The description of Traffic Calming should be prescriptive instead of descriptive. It should be more robust and it should not be limited to local, suburban, or neighborhood streets. Increased safety and modification of driver behavior is needed throughout the network.
	3.4	<i>Traffic Calming</i>	X	Why does this section NOT include mention of the Rt 50 Traffic Calming Project?	The Route 50 Traffic calming is a national model and should be mentioned in this section.
Chapter 3: Countywide Bicycle and Pedestrian Policies	3-8	<i>Prioritization Priority shall be given to construction of bicycle and pedestrian accommodations and connections associated with arterial and collector roadways with emphasis on the completion of connections between existing facilities in an effect to provide regional connections, and to the provision of safe walking and bicycling routes to new and existing public schools.</i>		Why is there no mention of suggested specific Routes? Throughout bike Ped Section of the plan, there is only suggestions of bike facilities along existing or planned roadways. There is no specific Trails or key routes to be built (other than "Regional Trails" shown on map, to provide either commuting connectivity or recreational trail connectivity.	Suggest that specific Routes or Trails with start and end points be identified on the 2040 map and referenced within the County Transportation Plan document; welcome the addition of the "Regional Trails" concept. Great idea for placements along the Broad Run and Goose Creek (assuming it is far enough away from the streams to not violate any required natural buffers).



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Chapter 3: Countywide Bicycle and Pedestrian Policies	3-8				The identified "Bike Routes" (SEE END OF SECTION) would be made up various and often multiple bike facilities and have signage to indicate to drivers where to expect cyclists and for cyclists on where to turn and which bike facility to follow. Bike Loudoun has identified some Bike Routes to include on implementation plans in the first few years. Note--these are further described on Bike Loudoun website with more details of each of the proposed routes.
Chapter 3: Countywide Bicycle and Pedestrian Policies	3-8			Why does the County Transportation Plan Document NOT include mention of Bike Routes and how signage would be funded and which department(s) would be responsible for designing, locating, installing and maintaining the bike route signage?	Currently the document only states in Chapter 10 – Implementation of the Plan: "Study opportunities for signed bicycle routes to encourage and facilitate longer distance bicycle travel in the County." This should be strengthened to, for example "The County will implement various short and long-haul bike routes with appropriate way finding signs to facilitate both commuting and recreational bike alternatives."
Countywide Transit Infrastructure Policies	3.11 & 3.13	Policies 3-3.2, 3-3.3, 3-3.8.3-3.9		With the need for time to develop a good transit network for the UPA, doesn't this make the case for the prematurity of a northern UPA at Rt 28 and Rt 7 and for the need to plan in advance of approving any additional mixed use centers along the Route 7 corridor?	
Chapter 3	3-1.12	Changes to VDOT standards		How can the county push for more progressive, safer, cheaper designs?	Use AASHTO/FHA Flexibility in Highway Design handbook to push VDOT toward safer and more constrained designs. Use VDOT Highway Safety Improvement Program office to encourage flexibility and safer designs based on more recent research.
Chapter 3	3-1.15	Complete streets		Will the county officially enroll in the Complete Streets program?	Consider enrollment in CS and a robust program to embrace its policies.
Chapter 3	3-1.18 to 3-1.20	Functional classifications		Do the county and VDOT coordinate with communities to determine functional classifications, and using what criteria? What if reclassification destroys local economies and historic and scenic assets?	Communities and citizens living on and near the road should be involved in any changes in functional classification, and such changes should include broad criteria that considers economic and community impacts and consider alternatives.



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Chapter 3	3.16	<i>Route 15 an Expressway</i>		Is the county planning to eliminate access to historic, scenic, and tourism sites on its National Scenic Byway in the Journey Through Hallowed Ground Region?	This designation is inconsistent with preservation policies elsewhere in the CTP. Remove classification of Route 15 as expressway. Adopt Visualize 2045 policies and JTHG Scenic Byway management plan instead.
Chapter 3	3.19	<i>Roundabouts</i>		Doesn't state VDOT policy require preference for roundabouts over signalized intersections?	Language and policy should echo VDOT state policy on roundabout adoption: "The Virginia General Assembly, in 2003, passed a resolution encouraging VDOT to construct more roundabouts instead of signalized intersections. Therefore, it is VDOT policy that roundabouts be considered when a project includes reconstructing, or constructing new, intersections. When the analysis shows that a roundabout is a feasible alternative, it should be considered the department's preferred alternative, due to the proven substantial safety and operational benefits."
Chapter 3	3.2	<i>Pedestrian refuges</i>		Why should pedestrians not have safe access on 2-lane median divided roads? What if they are raised medians?	Delete "4-lane roads or greater." Provide safe access for pedestrians on all roads.
Chapter 3	3.2	<i>Roadside features</i>		Don't roadside features also modify driver behavior and increase safety? See MacDonald, E. et al. 2008. The Effects of Transportation Corridors' Roadside Design Features on User Behavior and Safety, and Their Contributions to Health, Environmental Quality, and Community Economic Vitality: A Literature Review. University of California Transportation Center: Berkeley, CA. See "passive safety" vs. "environmental reference," p. 15.	Natural features refers only to planting new trees, not retaining tree canopy and protecting existing trees (although that is noted in other sections). Change from a descriptive to a prescriptive approach.
Chapter 4	4-1.9	<i>Applicants to define the roadways</i>		Shouldn't the county have greater oversight to ensure larger goals are met?	County, not developers should structure road design and access—more street grids, fewer windy roads through developments with only one or two access points in and out.
Chapter 4	4-1.24	<i>Roundabouts not preferred along transit corridors</i>		Don't transit corridors by their nature require safe pedestrian access and increased flow through intersections? What is the reason for discouraging roundabouts at these locations?	Roundabouts are the safest option for vehicles and pedestrians. Increase flow, and are designed to accommodate all vehicle types.



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Urban Policy Areas -- Creating a Multimodal System	4.2	<i>First paragraph continues to make the case for a comprehensive approach to creating a multi-modal system in the UPAs</i>		With the need to comprehensively develop a good multi-modal system/network for the UPA, doesn't this make the case for the prematurity of a northern UPA at Rt 28 and Rt 7 and for the need to plan in advance of approving any additional mixed use centers along the Route 7 corridor?	
Urban Areas Built Environment Policies	4.6	<i>DRPT street types--narrow local street</i>	X		Consider the addition of a new urban area street type that would be wide enough to accommodate a vehicle, but would be designed and oriented toward maximizing pedestrian and bicycle connections in mid-block areas within a 1/2 mile of the transit stations.
Urban Policy Areas Bicycle and Pedestrian Transportation	4.9-4.10		X	Considering emerging trends for motorized electric scooters and bikes, should these or other alternatives be included in the description of non-auto alternatives?	
Bicycle and Pedestrian Connectivity Policies	4.14	4-1.36		In the area of highest density and maximum walkability in the 1/2 mile radius of the Metro stations, would it be good to have a minimum of 12 ft sidewalks?	
TDM Policies	4.19		X	With the development of disruptive modes of transportation, should one policy make mention of supporting other services that may arise to reduce SOV trips and improve mobility particularly in the Metro areas?	
Suburban Policy Area	4.19	<i>1st paragraph, last sentence on the page</i>			AMEND: Last sentence doesn't seem to describe the experience of Loudoun resident who have been stuck in traffic without options for non-vehicular transportation.
Chapter 4	p 4-28, 9	<i>Rural roads policies</i>		Can a set of guidelines or a manual be designated to guide preservation and traffic calming strategies?	Such guides as When Main Street is a State Highway, Flexibility in Highway Design, and JTHG's corridor management plan provide options for policy guidelines.
Rural Policy Area	4.28	<i>Rural Roads Policies</i>	X	Since residents, county and VDOT have been working together to develop a VDOT rural roads maintenance policy, shouldn't it be mentioned as part of the policy to keep unpaved roads?	



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	4.28	<i>Rural Roads Policies 4-4.8</i>	X	Shouldn't traffic calming policies specifically mention roundabouts relative to the villages and towns?	
Chapter 4	4-30	<i>Travel demand management and land development in rural area</i>		Can a priority be to establish an "environmental capacity" of rural roads to guide TDM and development proposals?	Travel Demand Model should be revised with "environmental capacity" of roads, particularly historic roads and byways, becoming the standard. The point is to decrease sprawl and induced demand, (not cave in to the result of bad planning or development aspirations).
Chapter 5-Air Travel	5.1	<i>Washington Dulles International Airport</i>	X	Shouldn't the total average number of airport take-offs and landings be included as a point of reference?	The general public should know Dulles averages 1,635 commercial flights/day, 280 non-commercial flights/day, for total of 1,915 flights* (*MWA, IAD Monthly Traffic Summary Report, April, 2018).
Chapter 7	7-4	<i>Potomac River Crossing</i>		Should Loudoun County coordinate its transportation planning according to MCOG's identified cost-effective transportation strategies?	The analysis and weighted ranking of the most effective transportation strategies recently completed by MCOG put a new river crossing dead last on the value-for-cost. The county should plan transportation improvements based on that fiscally prudent analysis, and not be pressured by road-building and development lobbying efforts.
Chapter 7-Regional, State and Local Coordination	7.5	<i>Regional Recreational Access: Improved connections could, for example, provide access between the Appalachian Trail at Snickers Gap and the Village of Bluemont, between the C & O Canal Towpath at Brunswick, Maryland to the Town of Lovettsville, and between the C & O Canal at White's Ferry and the Washington and Old Dominion (W & OD) in the Town of Leesburg.</i>	X		ADD: A countywide trail network would also provide access to residents for these and state and local parks.
Chapter 8	8-1	<i>It is very important that policies support lowering total vehicle emissions and meeting air quality standards.</i>		Why is choice of intersection solutions not a part of air quality improvement policies?	Roundabouts sharply reduce vehicle emissions--carbon monoxide, carbon dioxide, oxides of nitrogen, and hydrocarbons--by 33 to 54%. Their use will greatly improve air quality.
Chapter 8	8-3	Road projects will "seek to" avoid limestone karst		Why is this not a stronger statement?	A number of water quality issues and sinkhole collapses of roads have occurred in Loudoun. Much more stringent testing and evaluation, and a higher priority on avoidance should be stated here.
Chapter 8	8-3	<i>Noise abatement policies</i>		Why does noise abatement not include vehicle operation?	Noise abatement policies should include prohibitions on engine braking by trucks.



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Chapter 8	8-4	<i>Heritage resources--historic districts</i>		Is the list of historic districts accurate?	VDHR lists 19 historic districts in Loudoun County
Chapter8-Environmental and Heritage Resources	8.4	<i>Heritage Resources</i>	X	Why are all of the County's historic districts not mentioned including the Catoctin Rural Historic District?	ADD mention of Catoctin Rural Historic District and other missing districts.
Chapter 8	8-6	<i>Heritage resource policies</i>		Why are policies so weak?	Heritage Resource policies must be prescriptive not descriptive or vaguely supportive. No teeth, no protections, no policies--these must be added.
Chapter 8	8-6	<i>Mosby Heritage Area</i>		Why aren't other highways and roads in the Mosby Heritage Area designated for protection?	
Chapter 8	8-6	<i>Route 50 Traffic Calming Project</i>	X	Why has this language from the 2010 CTP been removed?	Insert missing language: The County fully supports the US Route 50 (John Mosby Highway) traffic calming project that was federally funded in the 1998 TEA-21 bill as a national model in rural traffic calming. A goal of the project is to serve as a model for similar projects in other areas of the County as a means of providing safer communities at cost savings. Traffic calming is in keeping with the goal of preserving the scenic and historic value of the Rural Policy Area."
Chapter 8					Emphasize use of Visualize 2045 to help protect heritage resources
Chapter 9-Prioritization and Funding	9.8	Impact Fees	X	Should there be a reference to the possibility of using Impact Fees in those areas of the county where proffers are not considered?	
Chapter 10-Implementation of the Plan					
Implementation Strategies	10.1	1-bullet 4		Since the Emerald Ribbons plan is countywide and inclusive of these resources and more, shouldn't it be substituted for the "Rural Trails Plan?"	



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Chapter 10: Implementation of the Plan	10-1	Form a Citizen Bicycle and Pedestrian Advisory Committee to review and improve planning bicycle and pedestrian facilities in the County. Committee will include specific focus on the development of a Rural Trails Plan to include both on-road facilities and off-road corridors including stream valley trails and connections to nearby regional trail networks.		Why is there no mention of staff position for a County-wide Bike Ped Coordinator? The County needs a full time staff position to coordinate and prioritize all the different projects and ensure that as various road projects develop that the appropriate multi-modal solution is implemented.	Community Engagement and Bike Pedestrian Coordinator. Bike Loudoun and the greater cycling citizenry of Loudoun applaud the inclusion of the words in Chapter 10 – Implementation of the Plan: “Form a Citizen Bicycle and Pedestrian Advisory Committee to review and improve planning of bicycle and pedestrian facilities in the County.” Bike Loudoun would very much like to be part of this Committee.
Chapter 10: Implementation of the Plan	10-1			County has had two short lived part time Bike Ped Coordinators in the last 10 years. Can we not step up and commit to one full time Staff Position? Fairfax County has 5 full time Staff just for Bike Ped issues.	Strongly encourage the County to maintain a full time Bike and Ped Coordinator on County Transportation Department staff roster. Such a role is critical to ensure productive and efficient planning and implementation of these various bike routes and bike facilities and make it easier for the Community to interact with the Transportation Department.
	10.2	2-add bullet	X		ADD: Develop strategies to reduce SOV trips.
		3-add to text: Expand public outreach and educational programs to promote and encourage the use of transit, bicycle and pedestrian transportation, and ride-sharing, carpooling and vanpooling.			ADD: Expand public outreach and educational programs to promote and encourage the use of transit, bicycle and pedestrian transportation, and ride-sharing, carpooling and vanpooling as an element of an SOV trip reduction strategy.
	10.3	4. Integration with neighboring jurisdictions to improve regional and statewide connectivity and to attract residents and businesses to Loudoun County.		Why does Loudoun need to attract residents?	DELETE: "residents and" from the statement.
	10.4	5--add bullet	X	Shouldn't something be said about ensuring the long-term viability of the airport by protecting the noise contours from residential development, and ensuring that housing within a set distance beyond that be constructed with the proper noise dampening materials?	ADD: Ensure that the County protects the long-term viability of the airport through updated noise contours and the requirement for noise dampening materials in the construction of residential and institutional facilities within a specified distance of flight-paths.



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2040 County Transportation Bike Ped Map		<p>Legend of Bike Facilities to be used: Current Bike Facility Descriptions (According to the 2040 Draft map):</p> <ul style="list-style-type: none"> i. Shared lane with pedestrian facilities provided as called for by geographic policy area ii. Striped bike lane with pedestrian facilities provided as called for by geographic policy area iii. Trail on one side of the road and sidewalk on the other side of the road iv. Trails on both sides of the road (Urban/Suburban/Transition) v. Trail on one side of the road (Rural) vi. Washington and Old Dominion Trail vii. Regional Trail 		<p>Why are the "Bike Facility" descriptions so confusing? We believe clarity could be improved on the description of each type of the 7 Bicycle Facilities to be used by the County.</p>	<p>Suggested Facility Names with Definitions which should be included in CTP Document as well as on map: Proposed Bike Facility Descriptions: (note: first three are on road/street facilities, others are separated from the vehicle roadways)</p> <ul style="list-style-type: none"> i. Striped Bike Lane: A marked portion of a roadway that has been designated for exclusive use by bicyclists. Bike lanes are for one-way travel only. ii. Marked Shared Lane (Sharrow): A roadway that includes pavement markings to indicate the appropriate position for bicyclists using a travel lane that is shared by motor vehicles and bicycles. While bicyclists have the right to use the full travel lane, a sharrow alerts motorists to the presence of bicyclists along particular routes that are commonly used by bicyclists but where there is not adequate space for a bike lane. iii. Paved Shoulders: Roadways with areas of pavement just outside the regular travel lane. Paved shoulders may be used by bicyclists similar to a bike lane but may also accommodate stopped vehicles, emergency use, and pedestrians. For the purpose of this map, paved shoulders are indicated only along roadways that do not have curb and gutter (i.e. rural roadways). iv. Off Street Trails on Both Sides of Roadways: Paved multi-use paths, generally 10'wide. Trails are shared by bicyclists, pedestrians, joggers, dog walkers, strollers and other non-motorized uses. v. Off Street Trail on one side of Roadway, Sidewalk on other side: Paved multi-use path is generally 10'wide. Sidewalks are 4' to 6' wide. Trails are shared by bicyclists, pedestrians, joggers, dog walkers, strollers and other non-motorized uses. Sidewalks are reserved for non-bicycle use. vi. Off Road Rural Trail: A paved multi-use path (~10' wide) generally aligned with road right of ways, and an optional unpaved bridle path for equestrians along opposite side of roadway. Off road trails typically provide routes with a reduced number of street crossings or encounters with motor vehicle traffic. Paved trails are shared by bicyclists, pedestrians, joggers/runners, dog walkers, and other non-motorized uses. vii. Regional Trail: A paved multi-use path (~10' wide) not aligned with road right of ways. These trails, along scenic byways have unique Right of Ways. They include the W&OD Trail and future County Regional Trails. These typically provide routes with a reduced number of street crossings or encounters with motor vehicle traffic. Trails are shared by bicyclists, pedestrians, joggers/runners, dog walkers, and other non-motorized uses.
		GENERAL COMMENT		Will the transit plan be incorporated into the Transportation Plan when it's complete?	It's an important component of the plan.



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		GENERAL OBSERVATION	X	Does Staff acknowledge that the CTP reads more like a “Facilities Standards Manual” for transportation?	The draft is not really a plan per se for the future, but a listing of the kinds of policies and actions and standards which should be followed once the Board of Supervisors makes a transportation decision.
		NO BASELINE DATA	X	What is required in highway improvements to meet current deficits?	There is no analysis of the existing situation of our road network as to current “levels of service” or current priorities under the approved plans which cover the first six years or so. There is no identification of the major transportation bottlenecks.
			X	There is a need for a clear statement on the challenges facing the transportation system, an estimate of present deficits, funding limits, the need to prioritize, etc. Can this be added?	The draft presents a “utopian perspective” as if the County can have a fantastic multimodal transport system painlessly.
		NO RESULTS FROM THE TRANSPORTATION MODELING SYSTEM	X	A comparison table on the increase in traffic volumes on the main arterials over this period of time would be useful in understanding current conditions. Can this be added?	Modeling has been done in the County for at least 20 years, however, there is no section in which our Transportation Modeling is discussed and the results identified as consideration in future planning.
		NO DISCUSSION OF THE PROPOSED NETWORK AND COSTS OF LOCAL TRANSIT	X	It is correct that local inter-county transit fares cover only 8% of operations? If so, this is an important issue as the subsidies for local transit to service metro will rapidly become a significant cost item if a fully developed system is worked out.	There are only generalities about local transit networks, plans for the future, and their costs. It is probably not possible to do detailed projections, but the Plan could list factors to be considered and perhaps performance criteria as to when a service would be desirable.
		EVALUATE TRANSPORTATION DEMAND MANAGEMENT		Has there been any evaluation of the actual impact of actual TDM’s on the traffic pattern? Does anyone check if the agreements have been implemented. Can we recommend an evaluation of the TDM program with a fresh look at performance criteria?	The TDM concept has been used by the private sector as a means to otherwise lower the costs of road improvements for at least 20 years.
		NO CONSIDERATION OF THE IMPACT OF THE SILVER LINE METRO	X	Why is there no analysis of the transportation impact of the Silver Line Metro? Somewhere there must be ridership projections as one of the major sales points was that traffic on the road system would be reduced.	If because of high projected fares, and lack of demand so far experienced on the Silver Line suggest otherwise, this is important to our traffic planning. For example the CTP should provide ridership numbers and projections on the Toll Road and even estimate what Loudoun Toll Road Commuters are contributing to the Metro costs.
			X	Is it correct that the County is proposing to spend 300 million dollars on local roads and paths to service metro?	If this is true it should be in the plan with some clear statement of justification.



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		SUBURBAN/URBAN POLICY AREA	X	The Suburban/Urban Policy Area will build out over the 20 year planning period to 2040. What will be the impact of this build out on the road network transit system, and bike paths and trails? What are the land acquisition requirements if any? What would be the impact if there is a New Potomac River Bridge? What will be required to ensure that the transportation system will function at an acceptable level of service in 2040?	The CTP appears silent on these critical questions.
		RURAL ROADS AND WESTERN TOWNS	X	How will the rising traffic situation in rural Loudoun including the Western Towns needs to be carefully worked out? The impact of the Town's future growth on the traffic network is critical.	The strategy must consider much more than "through traffic capacity" on Route 9, 15, 7, and 50. The impact of traffic on the sustainability of the rural economy and the potential pressure on increased housing demand is of vital importance to the area.
			X	How will the impact of traffic on the historic villages and the historic unpaved roads be considered within the broader context of the rural vision?	A carefully balanced approach including traffic calming, road maintenance, regulatory measures, and bottleneck elimination (such as regular points of flooding) all need to be considered.
			X		Given the massive demands for transportation investments in the Urban and Suburban Areas it is critical that transportation investment be kept to the minimum in the rural areas and towns through land use planning.
			X		A special study is required of the entire rural network and how it can work as a whole. The study should include recommendations for limiting high generator land uses and other traffic management techniques.

