

COALITION CONSOLIDATED LOUDOUN 2040 INPUT SUMMARY

**COALITION, TOWN & COMMUNITY
PLAN REVIEW / DIRECT INPUT**
~ 80,000 Residents Countywide

Loudoun County
Preservation and Conservation Coalition

Loudoun Preservation Society

Piedmont Environmental Council

Loudoun Wildlife Conservancy
Established 1996

FRIENDS OF THE BLUE RIDGE MOUNTAINS

Mosby Heritage Area

LH VA LOUDOUN HISTORIC VILLAGE ALLIANCE

Aldie Heritage Association

LINCOLN PRESERVATION FOUNDATION

Bluemont Citizens Association

Taylorstown Community Association

UNISON PRESERVATION SOCIETY

Waterford FOUNDATION, INC.

Save Rural Loudoun

Loudoun Walking & Volkssport Club
...in step with Loudoun's nature

Loudoun Equine Alliance

COLT
Coalition of Loudoun Towns:
Leesburg *Parcel Mill*

FARM BUREAU VIRGINIA
LOUDOUN COUNTY

PHTA
potomac heritage trail association

350 LOUDOUN
WAKE UP TO CLIMATE RESILIENCE!

BIKE LOUDOUN

Catoclin Creek
Scenic River Advisory Committee

HAMILTON

HILLSBORO

Town of Round Hill

Wade Capital Consulting LLC

**Discussion Aide for
Board of Supervisor
Work Sessions**

April 18, 2019



<p>Suburban Policy Area- VISION The Suburban Policy Area (SPA) contains self-sustaining communities that offer where one can live, work, and play. The SPA will have a mix of residential, commercial, and employment uses; a full complement of public services and facilities; amenities that support a high quality of life; and a design that incorporates a holistic approach to maintaining and improving community character through compatible development.</p>	<p>The Suburban Policy Area (SPA) is a mix of residential, commercial, and employment uses where one can live, work, and play with a full complement of public services and facilities; amenities that support a high quality of life. The SPA will include designs that incorporate a holistic approach to maintaining and improving community character through compatible development, selective mixed-use in-fill projects which includes meeting Loudoun’s “un-met” housing needs, responding to major traffic congestion, and over-coming public facility deficits.</p>
<p>Transition Policy Area - VISION The Transition Policy Area (TPA) is visually distinct from adjoining policy areas, providing expansive open space with recreational opportunities while accommodating a development pattern that promotes environmental protection, housing diversity, quality design, and economic growth.</p>	<p>The Transition Policy Area (TPA) is enduring, visually and spatially distinct from adjoining policy areas, utilizing green infrastructure policies to provide 50% or more open space that supports and protects public drinking water source watersheds, natural and historic assets. The TPA ensures abundant trails, parks, and recreational space while accommodating limited residential development with housing diversity, quality design and economic growth.</p>
<p>Rural Policy Area - VISION 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</p>	<p>The Rural Policy Area (RPA) will continue to be a permanent Countywide asset, with an enduring rural landscape characterized by limited residential development, a unique composite of natural and historic assets, rural economy and equine uses supporting tourism, working agricultural lands and open space. Its continued success requires a range of land management tools and performance standards to maintain long-term economic, environmental and social sustainability.</p>
<p>Rural Villages - VISION Rural Villages are important historic settlements that possess significant heritage, cultural, social, and economic assets that contribute to the character of the Rural Policy Area.</p>	<p>Rural Villages will continue to be vibrant communities that reflect historic settlement patterns that preserve and enhance Loudoun’s social and cultural heritage, while contributing to the tourism economy, maintaining small schools, and ensuring development in scale and compatibility to the Village and the overall character of the Rural Policy Area.</p>
<p>Towns and JLMAs - VISION The western Towns will continue to be hubs of economic and cultural activity in western Loudoun.</p>	<p>The western Towns will continue to be hubs of economic and cultural activity in western Loudoun.</p>
<p>CHAPTER 3 - NATURAL & HERITAGE RESOURCES</p>	<p>RECOMMENDED SUBSTITUTE LANGUAGE</p>
<p>Protect and enhance the County’s natural and heritage resources, which are fundamental to the health, safety, welfare, sustainability, and enjoyment of current and future generations.</p>	<p>Protect and enhance a connected network of irreplaceable natural and heritage assets by partnering with organizations, towns, state and federal agencies to provide health, safety, economic and social well-being, biodiversity, sustainability, and enjoyment for current and future generations. The County will enhance the Green Infrastructure role in providing a network of parks, trails, and passive recreation opportunities for all residents while it provides for clean water, biodiversity, and clean air for all to enjoy.</p>



CHAPTER 4 - HOUSING	RECOMMENDED SUBSTITUTE LANGUAGE
<p>Provide housing options that can accommodate a variety of lifestyles, households, ages, cultures, market preferences, incomes, and needs.</p>	<p>Maintain and increase the County's commitment to existing housing programs while requiring the private and non-profit housing providers to diversify the range of housing options to include: workforce housing; "unmet housing needs" for present and future residents in areas selected for planned growth; where adequate infrastructure, schools and public facilities are in place.</p>
CHAPTER 5 - ECONOMIC DEVELOPMENT	RECOMMENDED SUBSTITUTE LANGUAGE
<p>A diverse and globally competitive Loudoun Economy.</p>	<p>A diverse and globally competitive economy that creates high value employment opportunities, is fiscally sustainable, is sensitive to protecting clean water, air and the environment and maintains a high quality of life for residents.</p>
CHAPTER 6 - FISCAL MANAGEMENT & PUBLIC INFRASTRUCTURE	RECOMMENDED SUBSTITUTE LANGUAGE
<p>Provide high quality, efficient, and environmentally sensitive infrastructure systems supporting growth management goals and delivering innovative services to the community.</p>	<p>Employ a sustainable fiscal revenue strategy to provide high quality, efficient, and environmentally sensitive infrastructure systems supporting growth management goals and delivering balanced growth of housing, commercial sites, parkland, open space, utilities and social and community services to benefit our current and future citizens.</p>
COUNTYWIDE TRANSPORTATION PLAN	
<p>Efficient infrastructure networks that safely connect people to places within the community, to the region, and to the world.</p>	<p>Efficient infrastructure networks that safely connect people to places within the community, to the region, and to the world.</p>



CHAPTER 1: Introduction

A. SUMMARY / GENERAL OBSERVATIONS

The Chapter provides introductory information as an overview to the Plan. It also summarizes the legal aspects of the Plan.

B. CURRENT DRAFT ISSUES

1. The discussion of public input is about the process of obtaining it and not about the actual desires and priorities of the citizens (and the opposing views of the business community).
2. It also includes a section on Housing that needs review.

C. RECOMMENDATIONS / ACTIONS REQUIRED

1. It has been made clear through Public Input and Coalition Member input that citizens do not support the scale of development proposed in the Plan; the volume reflects the views of the Business Community, not the 30+ content providers for this report and public input summaries.
2. The Housing section in Chapter 1 will have to be revised if Housing Chapter 4 is revised to reflect the real constraints and citizens wishes.

D. VISION

CHAPTER 1 - INTRODUCTION	RECOMMENDED SUBSTITUTE LANGUAGE
Loudoun County continues to flourish as a prosperous and inclusive community with a well- deserved reputation for great places – natural and built, as well as, historic and new – in a variety of settings. The County will foster economic innovation, fiscal strength, and sustainability.	Loudoun County will be an inclusive community with great places – natural and built, historic and new – with a vibrant economy, fiscal strength, and sustainability to provide a high quality of life to its residents.

E. POLICIES, STRATEGIES, ACTIONS COMMENTS

1. A number of contributing organizations, including the Loudoun County Equine Alliance (LCEA), dispute the concept that it is the goal of a Comprehensive Plan to fulfill market demand for housing, stating:
 - a. Accommodating high demands for housing does NOT support Loudoun's economic development goals and has the potential for negative economic impacts.
 - b. Increased density in the Transition Policy Area (TPA) will drive away remaining agricultural businesses from the area (including equine) and damage the rural activities in the areas of the Rural Policy Area along the border of the TPA, the Rt. 15 corridor south of Leesburg in particular.

“This is an area where horse businesses still thrive but are threatened by encroaching development, traffic, noise and the incompatibility of suburban density with rural agribusiness.” (LCEA)



CHAPTER 2: Quality Development – Overview

A. SUMMARY / GENERAL OBSERVATIONS

The Section sets forth clear and useful guidance on the goals and qualities which contribute to achieving Quality Development. It describes the use of Place Types and outlines what they should contain and how they are to be used in the Planning Process

B. CURRENT DRAFT ISSUES

1. Concerns related to this section are around the importance of balancing flexibility with specific details. The text stresses the value of flexibility for accommodating the market, but there’s not enough recognition of the need for specific guidance to accomplish desired outcomes with both Place Types and Policies.
2. The sentence before the Policies section (indicating that they “apply County-wide unless otherwise indicated,” but there are just two actions that address a specific policy area.
3. Chapter 2 is 149 pages (58.4% of the 7 Chapters) and the other 6 Chapters combined are 41.6% of the pages.

C. RECOMMENDATIONS / ACTIONS REQUIRED

1. The blanket statement that policies “apply county-wide unless otherwise indicated,” needs further review since some policies are clearly not appropriate in all areas of the County (i.e. structured parking as the ultimate parking condition, shorter more walkable blocks in the RPA).
2. Chapter 2 should be split into separate spatial policy area chapters.

D. VISION

The proposed changes are intended to declare our methods for success and include sustainability at the top of the list of outcomes.

CHAPTER 2 - QUALITY DEVELOPMENT	RECOMMENDED SUBSTITUTE LANGUAGE
<p>Quality Development VISION Loudoun will carry forth our successful land use and growth management policy while promoting the well-planned development of unique and appealing places providing a full spectrum of housing and employment options that are linked to supporting commercial, entertainment, educational, agricultural, and recreational activity.</p>	<p>Loudoun will successfully utilize land use and growth management policy to develop sustainable, well-planned, unique and appealing places with a full spectrum of housing and employment options linked to supporting commercial, entertainment, educational, agricultural, recreational activity, and residents' needs and desires multi-modal transportation options.</p>

E. POLICIES, STRATEGIES, ACTIONS COMMENTS

The first sentence in this section says, “Unless otherwise specified, the following Policies, Strategies, and Actions apply countywide.” It doesn’t appear to be the case however, that all of the policies are applicable countywide except for the two specific references that state specific guidance for the Suburban and Urban Policy Areas.



1. Review QD Policies #2, 4, 5, 6 and adjust for applicability countywide.
2. Under QD Policy #7 Action A (pg2-11), could the reference to density based on gross area be interpreted as inconsistent with the text on pg. 2-8 where residential density based on acreage?
3. Action E under Policy #7 references structured parking as the ultimate condition is not applicable countywide.
4. Our other recommendations on policies, strategies and actions for this section presume that there would be changes that clarify which policies are appropriate by policy area and location.

F. QUESTIONS FOR WORK SESSIONS

1. There is no reference to achieving work force and affordable housing goals in the Residential Place Types. How will these elements be achieved?
2. The Plan calls for innovation, flexibility, and new forms of housing. The Place Types in all cases present pictures and policies of conventional housing projects already built in the County. How will they be used to encourage the new community forms desired?
3. Actual development applications reflect market conditions and product mix believed by the applicant to be saleable. Will the proposed Place Types and Design Guidelines be used to recommend denial if an actual application does not support a Place Type?



CHAPTER 2: Quality Development – Infill & Redevelopment

A. SUMMARY / GENERAL OBSERVATIONS

This section provides useful and appropriate policies to guide Infill, Redevelopment, Revitalization, and Reuse.

1. It could be strengthened by a more in-depth discussion of the role of the private sector as the developers and what their financial base line requirements might be to initiate projects.
2. The Policies, Strategies, and Actions correctly stress the need for community input and support and the importance of compatibility with the surrounding areas.

B. CURRENT DRAFT ISSUES

1. References to the village cores mostly make clear that the references are to the historic villages in the Suburban Area, but not completely. The text should more clearly note the difference between the Suburban historic villages and the Rural historic villages.
2. The definitions of the Revitalization and Redevelopment fail to mention the need for upgrades in public infrastructure, the establishment of missing capital facilities, and parks and open space as part of the program.

C. RECOMMENDATIONS / ACTIONS REQUIRED

1. The Coalition of Loudoun Town infill/redevelopment September 5, 2018 analysis identified many sites in the Suburban Policy Area with potential to be redeveloped into high-density residential or mixed-use to alleviate growth pressure on the Transition and Rural Policy areas while locating development near existing transportation, shopping, services, parks, utilities, and other suburban amenities. The Board should reconsider their proposals.
2. Include the Transition Policy Area for the application of the Infill policies, strategies, and actions.
3. Revise the definitions on page 2-14 to reflect the County role in provision of infrastructure, capital facilities, parks and open space on the one hand and the private sector investment role on the other.

D. VISION

The statement should mention enhancing affordable housing stock.

CHAPTER 2 - QUALITY DEVELOPMENT	RECOMMENDED SUBSTITUTE LANGUAGE
<p>Infill and Redevelopment - VISION A community where careful public investment in services, facilities, and growth management can maintain neighborhood vitality, revitalize underused areas, and facilitate complete, connected, and distinct communities.</p>	<p>Loudoun County will utilize infill, revitalization, and redevelopment policies to maintain vibrant communities, revitalize underused areas, with planned public investment in services and facilities, through public/private partnerships.</p>



E. POLICIES, STRATEGIES, ACTIONS COMMENTS

- 1. Addition of the concept of meeting community needs and values is critical to the PSAs.
- 2. Policies should “require” community amenities (pedestrian/bicycle facilities, sidewalks, traffic calming, street lighting, bus stops, cultural centers, and community gathering places) without “incentives.”
- 3. Zoning regulations should not need to be “flexible” to encourage and ensure creative design standards meet community needs and values.

F. QUESTIONS FOR WORK SESSIONS

- 1. Will the major emphasis on creating new areas for Mixed Use Projects along the major road corridors limit the interest in Infill and Redevelopment projects?
- 2. The Transition Policy Area also should be subject to the Infill policies and actions. However, the section of Chapter 2 covering the TPA does not call for their use and is silent on the need for Community input and support. Why is this not mentioned?



CHAPTER 2: Quality Development – Urban Policy Area

A. SUMMARY / GENERAL OBSERVATIONS

Loudoun County opted into the Metro Silver Line in 2012. However, the County still does not have an overall Plan for the Urban Policy Area (UPA). The present draft Plan covers many design ideas and policies, but leaves unaddressed key questions.

B. CURRENT DRAFT ISSUES

1. Insufficient attention on urban growth in plan (lack of timelines and design details).
2. Insufficient walking/biking plans create a disconnect with goals.
3. Negative financial impacts if not properly designed and implemented.
4. County lacks experts on urban areas and necessary expertise is not addressed in plan.
5. Interim development (i.e., before Plan and new zoning) is not tied directly to ultimate vision.

C. RECOMMENDATIONS / ACTIONS REQUIRED

1. Recognize that the future of the Metro Tax District and the Urban Policy Area are the most important development challenge in Loudoun for the next 20 years and should be viewed as a sustained development issue and not merely a “planning issue.”
 - a. Add specific detailed small area plans for each Metro Area.
2. Establish a Task Force with representatives from Economic Development, Transportation, Planning, and Finance under an Assistant Administrator to guide the work over time.
 - a. Add outside experts in urban planning to effort.
 - b. Retain on an “as needed” basis architect/design expertise with urban design experience and a real estate specialist with major experience in marketing and coordinating urban development at this scale.
3. CTP must ensure separate lanes for Bikes, Pedestrians & cars on all streets near stations, not just shared car lanes.

D. VISION

Loudoun needs to clearly articulate that the majority of future growth is expected to happen at the Metro Station area. This is more sustainable, manageable, and matches where the public has indicated that it wants the County to grow.

CHAPTER 2 - QUALITY DEVELOPMENT	RECOMMENDED SUBSTITUTE LANGUAGE
<p>Urban Policy Areas - VISION The Urban Policy Areas (UPA) will be complete communities that accommodate living, working, shopping, learning, and playing in dense urban environments of walkable mixed-use and transit oriented development. These areas will possess high-quality public environments with accessible and connected spaces, and a rich mix of uses that establish a distinctive sense of place. UPA communities are envisioned to support development types, patterns, and densities that will create jobs, grow the tax base, and be fiscally sustainable.</p>	<p>The Urban Policy Areas (UPA) will be the target area for most of Loudoun’s future growth through 2040, with complete communities that accommodate living, working, shopping, learning, and playing in dense urban environments of walkable/bikeable mixed-use and transit-oriented development. These areas will possess high-quality public environments with accessible and connected spaces, and a rich mix of uses that establish a distinctive sense of place. UPA communities are envisioned to support a range of residential options for all income levels, development types, patterns, and densities that will create jobs, grow the tax base, reduce additional traffic and be fiscally sustainable.</p>



E. POLICIES, STRATEGIES, ACTIONS COMMENTS

- 1. The policies, strategies and actions in the UPA do not adequately provide detailed direction and outcomes the County wants to achieve in the three station areas.
 - a. There should be overall policies with the next step to develop even more detail through specific area plans that are included in the Comprehensive Plan.
- 2. Loudoun should study the examples set in neighboring jurisdictions on the Metro lines to consider the types of detail that should be in the UPA overall plan, and in the specific area plans for each station.
 - a. Some of the many details to include: consideration of orientation and placement of public spaces; site design principles to maximize solar access; placement and mix of residential units to minimize walking distances to the stations with availability for all ages and incomes; higher percentages of affordable and workforce housing; guidelines for grid of tree-lined streets to improve pedestrian experience, and trails and bike access throughout the area both near and further from the stations; guidelines for green buildings and plan for district energy to partner with nearby data centers and reduce overall energy impacts; protection of wetlands and headwater streams, preservation of natural resources and stormwater management using LID and natural systems.

F. QUESTIONS FOR WORK SESSIONS:

- 1. What is the comparative advantage of Loudoun’s Metro locations and land area over the stations that are in Fairfax and Arlington? How will Loudoun maximize its advantages? How are the different roles between the Ashburn and Gateway Stations being defined, and how will Loudoun best take advantage of its land area within a half mile of the Innovation Station in Fairfax?
- 2. Should the top priority to obtain the largest amount of tax revenues with build out in the shortest time that ultimately will cost the county more in services? Or should it be to seek longer term, higher value build-out as the market matures which may better serve the long-term interests of Loudoun citizens? What are the benefits achieved through a detailed plan that meets multiple objectives?
- 3. What will be the effect of the Urban Policy Area build-out on similar land use projects elsewhere or will development outside the tax districts hold back the growth of the Urban Policy Area?
- 4. As other counties have discovered, Loudoun may have to prioritize public capital investment to make the Urban Policy Area attractive for investment. Can the County afford to do that if it does not reduce growth and associated needs created by new residential growth elsewhere?



CHAPTER 2: Quality Development – Suburban Policy Area

A. SUMMARY / GENERAL OBSERVATIONS

The draft Plan makes a major shift from the Revised General Plan (RGP). The RGP planned the Suburban Policy Area (SPA) as the low-density fringe of the Washington Metropolitan Area with specific focus on the quality of life for families. The draft Plan proposes urban densities with a focus on the “millennials” cohort with the conversion of reserved land for high value economic development into mixed use areas.

B. CURRENT DRAFT ISSUES

1. The Suburban Policy Area has been designated as having three “small area plans” without any true planning done to demonstrate how they are related to the transit stations to which they are connected.
2. Too much retail with not enough demand.
3. SPA Small Area Plans are needed to avoid public facility deficits required before opening up higher density/mixed use projects.

C. RECOMMENDATIONS / ACTIONS REQUIRED

1. Define implementation requirements for “small area plans,” along with necessary community outreach, prior to opening up the Suburban Policy Area to the Mixed Use development as proposed in the draft Plan.
 - a. Required to ensure future development can be well serviced by schools, parks, trails, and other capital facilities and the traffic generated will not cause permanent and irreversible congestion. (SPA Policy 1, Strategy 1.1., Action A)
2. Implement strategy, “Reserve adequate amounts of developable commercially zoned land for cluster growth” as part of the small area plans. (Chapter 5, Economic Development, Policy 1, Strategy 1.5., Action F).
 - a. Land should be held back from Mixed Use development to attract major institutions and/or corporate headquarters.
3. Adopt an integrated land use and transportation phasing plan that details how needed facilities and services are to be provided until the Arterial Road Improvements are made.
 - a. The February 1, 2019 County Staff Report stated, “Fiscal results are pending analysis of whether and to what extent additional transportation infrastructure is needed to accommodate forecasted growth.”

Essential detailed planning must be completed to ensure that the Suburban Policy Area will not result in a significant lowering of the quality of life for SPA residents through public facility deficits and continued traffic congestion.

- b. *This recommendation does not apply to the UPA and Metro Tax District.*



- b. To cover for the residential financial deficits, the Plan (based on Planning Commission requests and forecasts) calls for a massive expansion of land available for “light industrial” Data Center development surrounding the new Academies of Loudoun STEM school.
- c. The volume of light industrial/data center land in the plan may likely jeopardize the important source water protection area for the drinking water supply from Goose Creek.

C. RECOMMENDATIONS / ACTIONS REQUIRED

1. All groups support a substantial decrease in the TPA build-out potential, with some differences in focus and detail between contributing member organizations:
 - a. Perspective 1: Supports the proposed TPA build-out per the May 2018 draft and would include amendments to the "Transition Area Small Lot" and Transition Area Compact Neighborhood" to include performance criteria for minimum and maximum acreage with allowable increases in density directly related to the provision of workforce housing and “unmet needs.”
 - b. Perspective 2: Proposes two tradeoffs of increased density in selected areas. Some prefer no density increase at all, retaining the single-family-detached neighborhood structure that reflects most of the TPA development today. Others would prefer to see the existing density (or a slight increase) concentrated in specific areas (i.e. Q2 and L1) to match the surrounding density, with infrastructure to support it; IF the density increase were to be exchanged for more public space in the remaining TPA.
 - c. Perspective 3: Supports limiting build-out potential to its current maximum in order to accommodate drinking water source protections and acreage that will be needed for TPA and SPA schools, parks and trails and other public facilities. Bonus densities would provide for a limited increase in overall build-out.
2. Do not permit the transfer of RPA land bays P1, P2, and Q1 into the TPA to prevent setting a dangerous precedent.
3. Contrary to arguments presented, adding 1000 more houses in this area will worsen the current issues expressed by the current residents which include: noise and run-off from the Greenway; lights from Heritage High School and Sports Plex; difficulty accessing Evergreen Mills Road safely during rush hours; and new County Shooting Range being built.
4. Cut back the Data Center Industrial Area to remain only on the north side of the Greenway. Exclude industrial/data centers from all of Land Bay A-1 south of Greenway, all of Land Bay A-2 and all of Land Bay A-4 to protect the school site, existing residential development, to preserve the heavily wooded area and protect Goose Creek and the drinking water intake.
5. Eliminate commercial “mixed use community centers,” west of Northstar Blvd in the TPA.
6. Condition the opening of the TPA for increased density development to the completion of the essential road improvements as set forth in the CTP and the reservation of essential school sites, parks and trails to service the growing population in the future.
7. Open space should be on contiguous land and placed in permanent conservation easement to preserve from future land use changes. An Open Space Plan should be required from all development applications that demonstrates how the open space is integral to the development and contributes to contiguous trail connections throughout the policy area.



8. Preserve 70% open space in the Lower Bull Run, Middle Goose and Lower Sycolin subareas.
9. Keep Northstar Blvd to 4 lanes south of Rt 50 and delete reference to Bi-County Parkway.

D. VISION

CHAPTER 2 - QUALITY DEVELOPMENT	RECOMMENDED SUBSTITUTE LANGUAGE: Options
<p>Transition Policy Area - VISION The Transition Policy Area (TPA) is visually distinct from adjoining policy areas, providing expansive open space with recreational opportunities while accommodating a development pattern that promotes environmental protection, housing diversity, quality design, and economic growth.</p>	<p>The Transition Policy Area (TPA) is enduring, visually and spatially distinct from adjoining policy areas, utilizing green infrastructure policies to provide 50% or more open space that supports and protects public drinking water source watersheds, natural and historic assets. The TPA ensures abundant trails, parks, and recreational space while accommodating limited residential development with housing diversity, quality design and economic growth.</p>

E. POLICIES, STRATEGIES, ACTIONS COMMENTS

1. The PSA for the Transition Policy Area ***assumes that proffer policies will be extended to cover the area.*** But if there is a court challenge or other reason proffers are not available will the same proposed 14,000 Single Family Detached (SFD) and Single Family Attached (SFA) be proposed. ***Should the PSA reflect this situation?***
2. Prior to the establishment of higher density residential units to create affordable and diverse housing opportunities, the opening up of the TPA should only be done under highly controlled policies which will actually achieve the housing policies of the County as opposed to more suburban style housing. Note “mixed use” projects should not be introduced to the TPA.

F. QUESTIONS FOR WORK SESSIONS:

1. Should the proffer issue be resolved legally before the County commits to adding 17,640 homes?
2. Will any transfer of RPA property to the TPA set a precedent which will require future Boards of Supervisors to approve additional transfers as property owners seek the land value windfall?
3. Should the massive amount of data center development be cut back and away from existing residential developments?
4. Presently the residential Place Types all include pictures of standard suburban housing and have no specific performance standards for the provision of workforce housing and responding for “unmet needs.” Shouldn’t any additional housing be required to meet specific performance standards that will result in workforce housing and respond to “unmet needs?”
5. The Plan calls for a large “mixed use community center” on Route 50 across from Lenah. This will evolve into “highway commercial” and add to congestion on Route 50 as well as undermine the historic character of the highway less than 2 miles from Mt Zion Church. Should the Plan require all commercial development to be solely to serve neighborhoods and be internal to the TPA area?
 - a. The surrounding community has embraced a “mixed use” proposal for the southwest corner of Gum Spring and Braddock in order to dramatically reduce trip counts that a retail-only development would generate. Given the unique challenges posed by developing this parcel and it is currently zoned as residential, should this type of unique solution be examined?



6. Is there any obligation to consider the investments of residents who purchased their property under one set of Plan assumptions when considering a new set of Plan policies which will have substantial negative impact on those existing residents?
 - a. As an example, the southeast corner of Gum Spring and Braddock was recently rezoned for a small amount of retail, a large dedicated portion for open space uses, and the remainder for residential uses. Yet Loudoun 2040 Plan calls for the whole parcel to be designated as Commercial. Should the Plan dramatically change the character of a parcel that a recent Board, Planning Commission and County Staff painstakingly approved and residents in the adjacent community based their purchases on?

7. The TPA has the potential if properly planned to be the “Green Lungs” of the SPA with provision of school sites, parks, trails which can be used by Suburban households. Should the TischlerBise study states a need for 14 new schools to serve the Plan proposed student population and a need to set aside 1,247 acres for public facilities. Should these essential facilities be planned and secured before the area is opened for additional development?

8. The CTP calls for Evergreen Mills Road to be four-laned eventually? Should this essential infrastructure project be in place prior to opening up the TPA for further development as has already been acknowledged in the Braddock Road M series land bays concerning the road requirements?



CHAPTER 2: Quality Development – Rural Policy Area

A. SUMMARY / GENERAL OBSERVATIONS

The section on the Rural Policy Area (RPA) provides a generally accurate reflection of the views of the County residents, both East and West, and current policies. However, the section needs to be strengthened by a stronger statement that the RPA is a permanent resource for the County.

B. CURRENT DRAFT ISSUES

1. The Plan does not speak strongly enough to the protections of Rural Policy Area. Green Infrastructure assets of the environment, natural and heritage are a critical component of the rural tourism industry. The location of inappropriate land uses in the RPA will destroy both tourism and agriculture.
2. All references to Purchase of Development Rights (PDRs) and Transfer of Development Rights (TDRs) have been struck from the plan. An almost unanimous position of contributing coalition organizations agree these are very important and useful conservation tools.
 - a. There has not been sufficient discussion of how they could be applied as proffers for commercial rezoning and more intensive land use in all policy areas.
 - b. It is absolutely necessary to have these tools in the Plan in order to be able to explore their potential uses to retain prime agricultural soils, open space, and land for the highly valued rural economy uses. They can create additional avenues and options as proffers for rezoning and new developments.
3. In general, there is too much emphasis in this chapter on economic development of the RPA, rather than preservation of agriculture, heritage and this natural resource.
 - a. For example, the Rural Economic Development Council (REDC) is designed as an ‘advocacy’ committee rather than just an advisory committee. They need to take into account the overall preservation and enhancement of the resources of the RPA as part of their mission and not allow inappropriate rural economy uses.
4. The outline for performance standards for rural economy uses needs to be expanded and emphasized.
5. While there are references to establishing trails in specific areas, the concept of a trail network needs to be developed, linking all policy areas together, including and especially the eastern region of the county where there are insufficient resources.

C. RECOMMENDATIONS / ACTIONS REQUIRED

1. Identify a full range of Land Management tools for future consideration to encourage land conservation. Include PDRs and TDRs as optional land management tools for consideration by future Boards of Supervisors.
2. Maintain rural roads policy and plan a network of trails for hikers, horse and bike riders.
3. Add Place Types for Rural Tourism Facilities and Cluster Housing which create performance criteria and specific development plans for the required open space, required for environmental protection and to be supportive of land use.



4. Strengthen the Policies for identifying appropriate and controlling inappropriate land uses being located in the RPA to preserve rural tourism and agricultural investments.
5. Land set aside for the rural economy or open space lot must contain a minimum of 80% Class I and Class II agricultural soils.

D. VISION

CHAPTER 2 - QUALITY DEVELOPMENT	RECOMMENDED SUBSTITUTE LANGUAGE
<p>Rural Policy Area - VISION 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.</p>	<p>The Rural Policy Area (RPA) will continue to be a permanent Countywide asset, with an enduring rural landscape characterized by limited residential development, a unique composite of natural and historic assets, rural economy and equine uses supporting tourism, working agricultural lands and open space. Its continued success requires a range of land management tools and performance standards to maintain long-term economic, environmental and social sustainability.</p>

E. POLICIES, STRATEGIES, ACTIONS COMMENTS

1. Although indicating support for the RPA as a whole, the Plan does not include policies, strategies and actions necessary and sufficient to maintain
 - a. prime agricultural soils and secondary cropland;
 - b. support for long-term farm leasing;
 - c. sufficient ag education and vocational training programs;
 - d. efforts to promote new farm infrastructure (e.g., water systems, barns, handling and processing facilities);
 - e. efforts to preserve older farm structures directly used for crops and livestock for food production; and
 - f. rural economy lots and open spaces appropriate and reserved for farming or for parks, trails, equine uses, and other outdoor recreation.
2. Linear parks are a critical component of all policy areas. They could link all policy areas together, including rural economy and agrarian land uses, and open spaces in the RPA. Such a system would contribute to and enhance the unique character of Loudoun County and integrate Loudoun County into an organic whole.

F. QUESTIONS FOR WORK SESSIONS:

1. The land management tools for the rural area should be comprehensive in scope, but flexible in implementation. PDRs and TDRs as land management tools have been requested by almost every group participating in this consolidated report. Why have they been dropped from the Plan when their use should be an option for consideration for future Boards of Supervisors?
2. Why are there no Place Types for Rural Tourism Facilities and/or Clustered Housing? Both are mentioned in the text but not illustrated as Place Types.
3. Development easements are created through the zoning and subdivision process and are different from Conservation Easements. Why are there no policies for Development Easements in the RPA?



D. VISION

CHAPTER 2 - QUALITY DEVELOPMENT	RECOMMENDED SUBSTITUTE LANGUAGE
<p>Rural Villages - VISION Rural Villages are important historic settlements that possess significant heritage, cultural, social, and economic assets that contribute to the character of the Rural Policy Area.</p>	<p>Rural Villages will continue to be vibrant communities that reflect historic settlement patterns that preserve and enhance Loudoun’s social and cultural heritage, while contributing to the tourism economy, maintaining small schools, and ensuring development in scale and compatibility to the Village and the overall character of the Rural Policy Area.</p>

E. POLICIES, STRATEGIES, ACTIONS COMMENTS

1. The “encouragement” of development in Rural Villages should not be a strategy. Infill development should be limited to residential and commercial uses that enhance the existing villages.
2. Small area planning should be in the control of the Rural Village community with assistance from the County professional staff.
3. Rural Commercial zoning should only allow for residential uses above or inside a common structure with a commercial use, not detached single family or single family townhomes.

F. QUESTIONS FOR WORK SESSIONS:

1. Given the close sense of community in the historic villages, should citizen participation be required for all development and public decisions which have direct impact?
2. The Plan calls for County Staff analysis of what self-identified villages should or should not be considered officially as Rural Villages. Would it be better to allow these self-identified villages to request status as a Rural Village and make their case within an application?
3. What is the justification of the County encouraging and seeking addition residential and commercial growth within historic rural villages?
4. Why should County resources be used to prepare “small area plans” for Rural Villages as opposed to supporting local village initiatives at preparing their own self-generated Plans reflecting the Village objectives and values?
5. The Rural Commercial zoning regulations were changed to accommodate growth pressures in Old Ashburn, but now jeopardize the commercial development in historic rural villages. Should the Rural Commercial zoning for rural villages be rewritten to reflect the wishes of the western rural villages?



CHAPTER 2: Quality Development – Towns & JLMA

A. SUMMARY / GENERAL OBSERVATIONS

The March 13, 2019 Plan draft is greatly improved over prior versions with the direct language provided by the Mayors of the seven western Loudoun towns. In the same manner, the seven Mayors contributed directly to language changes for the Policies, Strategies and Actions of the current draft. These changes should be accepted as final by the Staff and Board of Supervisors.

B. CURRENT DRAFT ISSUES

1. 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.
2. The JLMA's have been largely built in an around towns and factual information is needed as to 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.
3. Estimates of potential residential growth and dwelling units need to be calculated. Since school costs are charged to the County, dwelling units in towns are fiscally positive and are used to pay off water/sewer debt. This has an impact on the surrounding rural area.
4. However, data in TischlerBise Study for the Towns/JLMAs and the Rural Policy Area (RPA) cannot be calculated independently to show if the various areas are positive or negative.
 - a. The TischlerBise fiscal analysis aggregated Leesburg (~42K population), other Towns (~12K population with no significant non-residential) and Joint Land Management Areas (JLMA's, almost entirely residential). All may be fiscally negative due to the volume of residential.
 - b. When combined with the RPA, the "overall" is a negative fiscal impact, but without any indication of the breakdown between the differing areas with differing regulatory controls (County vs. Town).

C. RECOMMENDATIONS / ACTIONS REQUIRED

1. When the consultant was asked about this aggregation the response was that TischlerBise was asked to calculate in detail only the Urban, Suburban, and Transition Policy Areas and aggregate everything else. TischlerBise indicated they can analyze the RPA, Towns and JLMAs separate if asked to do so.
 - a. For a specific breakdown of the fiscal impact of the RPA the BOS should request that TischlerBise separate out the Towns, JLMA and Rural Policy Area.

D. VISION

CHAPTER 2 - QUALITY DEVELOPMENT	RECOMMENDED SUBSTITUTE LANGUAGE
<p>Towns and JLMAs - VISION The western Towns will continue to be hubs of economic and cultural activity in western Loudoun.</p>	<p>The western Towns will continue to be hubs of economic and cultural activity in western Loudoun.</p>



E. POLICIES, STRATEGIES, ACTIONS COMMENTS

The Policies, Strategies, and Actions and Guidelines have been revised directly by western Loudoun Mayors and should be included as written.

F. QUESTIONS FOR WORK SESSIONS:

1. What are the realistic changes that Schools and other public facilities will be built in towns in the future given their build out? Most likely they will be located in rural areas; have their impact been adequately considered?



- e. Removes all policies requiring special treatment for scenic corridors and most policies for protecting scenic rivers.
 - f. Removes incentives for adaptive reuse.
 - g. Removes commitment to maintain Certified Local Government status which provides access to grants for historic preservation.
 - h. Places open space and historic preservation in conflict by allowing applicants to make cash contributions for improvement of historic features in exchange for fulfilling open space guidelines.
 - i. The proposed volume of new housing in the plan will impact of increased traffic on historic rural road network.
3. Parks & Trails: Poor coordinated focus and strategy on clearly stated community requests for Parks and Trails.
- a. Parks & Trails policies, strategies and actions are hidden within Chapter 6 (Fiscal & Facility Management)
 - b. Parks & Trails are treated as a “proffer only” option instead of needed facilities (i.e., Capital Needs Assessment)
 - c. Parks & Trails not considered or treated as part of Green Infrastructure.

C. RECOMMENDATIONS / ACTIONS REQUIRED

- 1. Overall
 - a. Restore the Chapter title from the RGP: “Green Infrastructure: Environmental, Natural, and Heritage Resources” to reinforce the inter-related network of environmental functions that must work together.
 - b. Establish within the County Staff a “Green Infrastructure Working Group” for the purpose of strengthening cooperative working relationships for reviewing development proposals and furthering the Plan’s implementation
- 2. Green Infrastructure
 - a. Re-set “Green Infrastructure” name as an organizing principle and strategy with Watershed Management as the guiding approach, as over 750 plans throughout the Country have included.
 - b. Retain current RGP Green Infrastructure policies;
 - c. Environmental policies that apply to development must be identified at the time of application review, enforced during development, maintained after development is over, and monitored for continued performance. This requires coordination between departments. Update/strengthen sustainability, land acquisition, stream buffers, and integrated management strategy and protections for:
 - i. Rivers and Streams, Surface and Ground Water
 - ii. Mountainsides
 - iii. Strengthen Limestone Policies
 - iv. Strengthen Forest/Trees/Vegetation Policies
 - v. Complementary Elements (Non-attainment area has been removed)
 - vi. Reinstate Mineral Extraction Policies



3. Historic and Heritage Resources
 - a. Strengthen protections of historic assets and resources by restoring the RGP policies supporting historic and heritage resource preservation.
 - b. Restore commitment to maintain Certified Local Government status providing access to grants.
 - c. Restore the Historic Preservation Plan and land conservation tools for protection of the County’s cultural resources.
4. Parks & Trails
 - a. Reference Parks & Trails in Chapter 3, Natural & Historic Assets / Green Infrastructure Chapter.
 - b. Include a section on “Open Space Assets” by transferring discussion of Parks and Trails from Chapter 6 to Chapter 3.
 - c. Expand to include spatial role of School sites, Parks, and open space easements as integrated parts of the Green Infrastructure network.
 - d. Move/Incorporate Parks & Trails Policies, Strategies and Actions in Quality Development/Land Use Chapter 2.

D. VISION

The current language lacks a comprehensive view of the importance and functionality of the county’s natural assets. It doesn’t protect resources as the interrelated system that they are.

CHAPTER 3 - NATURAL & HERITAGE RESOURCES	RECOMMENDED SUBSTITUTE LANGUAGE
<p>Protect and enhance the County’s natural and heritage resources, which are fundamental to the health, safety, welfare, sustainability, and enjoyment of current and future generations.</p>	<p>Protect and enhance a connected network of irreplaceable natural and heritage assets by partnering with organizations, towns, state and federal agencies to provide health, safety, economic and social well-being, biodiversity, sustainability, and enjoyment for current and future generations. The County will enhance the Green Infrastructure role in providing a network of parks, trails, and passive recreation opportunities for all residents while it provides for clean water, biodiversity, and clean air for all to enjoy.</p>

Reasons for proposed text change: Add language that acknowledges natural assets as an irreplaceable unified system, to help protect assets throughout the County, rather than solely by site (conservation design), or by select policy areas. Expand the vision to acknowledge additional quality-of-life factors that the policies should protect, and who will contribute to their protection.

E. POLICIES, STRATEGIES, ACTIONS COMMENTS

1. The lack of goals and objectives affects the effectiveness of the policies, strategies and actions.
2. Policies, strategies and actions would be more comprehensible if they were paired with relevant descriptive text.
3. Strategies and actions refer to non-existent objectives.
4. Measurable goals, benchmarks for success, and timelines for carrying out actions are absent.
5. Many policies, strategies and actions are weak, or not up to 21st century standards.



APPENDIX: Natural and Heritage Resources

1. Policies from the Revised General Plan (RGP) that have been removed from, or weakened in the draft plan:
 - a. Removed: “The County will use **integrated management strategies** in using the Green Infrastructure to ensure that all land use planning and development respect and preserve holistic nature of the elements of the Green Infrastructure.” (GI policy 2)
 - b. Removed: Partnership w US Army Corps of Engineers to regulate wetlands. (RSCOD policy 13)
 - c. Weakened: “will **commit resources** to maintain the County’s flood maps as a Cooperating Technical Community (CTC)” to “will **maintain** its current status as a CTC.” (policy 20)
 - d. Removed: “Implementation of Prime Agricultural Soils policies will be coordinated with the County’s Erosion and Sediment Control Ordinance and other state and fed programs to appropriately deal with potential problems. They will also will be coordinated with the State Use Value Assessment Program and Ag and Forestral Districts.” (Prime Ag Soils)
 - e. Removed: “work proactively with residents to identify potential roadways for VA By designation” and to “define and designate historic access corridor districts.”
 - f. Removed: “The County will continue to play an active role on the Metropolitan Washington Air Quality Committee (MWAQC) and the National Capital Region Transportation Planning Board (NCTPB) and will do its part in implementation of the Phase II Attainment Plan and future emissions reduction programs.” (Air quality policy 5)
 - g. Removed: will no longer work with the Town of Leesburg to analyze long-term airport noise potential. (Airport Noise policy 2)
2. “The green infrastructure network should be approached as a system, regardless of ownership. Local, regional, state, federal, and private owners of the network should coordinate activities in order to provide an efficient, systems- based approach.” (SE Michigan comp plan)
3. Establish a centralized environmental planning and monitoring function with responsibility for coordinating the actions of individual county agencies to affect a comprehensive program to preserve and improve the environment. (Fairfax County)
4. Take a regional or watershed-based approach to environmental issues. (Fauquier)
5. Initiate the formation of a local interjurisdictional Natural Resources Working Group for the purpose of strengthening existing partnerships and developing new cooperative working relationships. (Arlington)
6. Integrate and link planning, development and environmental goals and efforts by creating a coordinated policy and management framework. (Arlington)
7. All County offices, to include Loudoun County Public Schools, involved in land use will coordinate with local, federal, state, and regional environmental organizations to facilitate the exchange of data and implementation of environmental protection measures. (Prince William County)
8. Reinstate integrated management policies from the RGP that have been removed or weakened.
9. Set Measurable Goals and Metrics for Achievement
 - a. Tree Canopy
 - How much currently exists?
 - b. Wetlands
 - Where is it located (map)?
 - c. Unvegetated stream banks
 - What is the goal for the amount or % of each?
 - d. Ecological cores & natural corridors to connect
 - What are the benchmarks/timeline for achieving goal?
 - e. Impervious surface



Value of Green Infrastructure: Envision Loudoun Foundations Report, 2017

8. OUR ENVIRONMENTAL, AGRICULTURAL AND CULTURAL HERITAGE

Abundant natural resources and a rich cultural heritage have defined Loudoun County’s unique sense of place for more than two and a half centuries. The Blue Ridge Mountains, Broad Run and other major watersheds, forests, rural open spaces, vast stretches of agricultural land, and numerous historical sites are tangible assets that make the County an appealing place to live and work, while contributing directly and indirectly to the Loudoun economy. The County has a history of protecting and preserving the components of its green infrastructure system through policies, regulatory measures, land acquisition, and educational programs. As the County grows in the future, it will be important to understand how green infrastructure will continue to be managed and protected over time.

What is Loudoun County’s Green Infrastructure?

Loudoun County defines its green infrastructure system as a “collection of natural, cultural, heritage, environmental, protected, passive, and active resources that [are] integrated in a related system.” This is a complex system of interrelated natural and historic features that can be best described as including four main components:

1. **Natural Resource Assets** (rivers, streams, wetlands, water sources, geology, soils, forests, trees, vegetation, and wildlife habitats)
2. **Heritage Resource Assets** (historic and archaeological resources, and scenic areas and corridors)
3. **Open Space Assets** (greenways, trails, parks, recreation, public school sites, open space easements; some are for passive enjoyment and some have active programming)
4. **Complementary Natural Assets** (air quality, dark skies, and the aural environment)

The Value of Green Infrastructure

Green Infrastructure systems provide natural resource value to the Loudoun community, along with many social, economic, and fiscal benefits:

- **Increased Property Values**—open space, greenways, and parks increase property values
- **Natural Stormwater Management** – increasing stormwater storage through protection of natural hydrologic systems results in fiscal savings and reduction of private property loss due to flooding
- **Community Health** – limiting exposure to land and water pollutants increases the health of our community
- **Sense of Place** – protecting historic sites, cultural resources, and the surrounding spaces that provide the context for these special places helps to preserve Loudoun’s sense of place and the visual and tangible conservation of its cultural and historic identity
- **Energy Efficiency** – protecting tree canopy and forests reduces the “heat island effect” and results in savings on utility bills
- **Recreation and Active Living** – recreational access to nature through parks, greenways, and trails creates a healthier active environment for residents, and adds value to related recreational businesses
- **Enhancement of Tourism** – protecting natural open spaces and heritage areas adds value to the tourism economy and enhances the value of related businesses
- **Species Diversity** – protecting natural habitat and migration corridors can support plant and animal species diversity and help them thrive

Source: 2017 Envision Loudoun Foundations Report

Loudoun’s Green Infrastructure At-A-Glance



30,375 acres of floodplain



39 miles of Potomac River waterfront



8,143 acres of parkland



43,528 acres of active farms and agricultural districts



9 historic districts

for historic and cultural conservation areas, historic sites, and historic roadways

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CHAPTER 4: Housing

A. SUMMARY / GENERAL OBSERVATIONS

1. The April 3, 2019 Staff report summarized several key facts:
 - a. The January 2018 Kimley-Horn Market Analysis forecast for Loudoun County concluded a “market demand” of 60,120 housing units. This “market demand” was defined as “unconstrained by policy decisions, land availability and public sentiment . . . focused solely on what the real estate market would support . . . through 2040 with no barriers to development.”
 - b. The September, 2018 Metropolitan Washington Council of Governments (MWCOC) forecasted 108,000 residential units for the Metropolitan Washington **REGION** by 2040.
 - c. Taken together, this indicates the current TischlerBise fiscal analysis and County forecast of 56,360 less the current Revised General Plan forecast of 29,470 units by 2040 indicates the **current Plan draft expects Loudoun to fill over 25% of the entire Region’s housing requirements.**⁵
2. The claim by business interests that Loudoun needs to meet all housing demand to support the economy has been questioned by both the Board and the public.
 - a. In Chapter 5, Economic Development, it states, “Since the start of the fiscal year 2014, Loudoun has announced more than 344 deals, representing approximately 13.5 billion dollars of commercial investment and 16,280 jobs created or retained. (Chapter 5-3).
 - b. With nearly 50,000 residential units already approved for development it is clear Loudoun’s commercial development can continue unobstructed.
3. Workforce housing is a serious problem, but it is not solely a Loudoun issue as implied in the Housing Chapter. It is a problem created by decades of stagnant wages while housing costs have risen. Loudoun has already discovered, during the rapid residential housing growth over the last 20 years, that simply building a lot more housing will not solve the regional issue, but rather increase the workforce housing need. *A separate white paper has been prepared to identify the primary recommendations and actions for the Board.*

B. CURRENT DRAFT ISSUES:

1. The text fails to acknowledge housing demand and affordability as national and regional issues; the County has limited options and funds and should not expect to fill a larger than fair share of entire need.
 - a. As the George Mason University (GMU) Report points out, Workforce and Affordable Housing is a widespread problem; every jurisdiction in the Washington Metropolitan Area has similar “house burdened” populations nearing 30% of the total.
2. The TischlerBise Fiscal Impact Study (February 1, 2019) and County Staff reports point out that, “development of office, industrial, and data center square feet are expected to be the same under either [RGP or Loudoun 2040] plan,” (p.4).

⁵ Item 1, Loudoun 2040 Comprehensive Plan BOS Work Session, April 3, 2019, p. 2



- a. Both plans provide high value economic growth. However, the 2040 Plan proposed addition of 28,496 residential units (Medium Scenario less RGP forecast) is estimated to create 16,541 jobs primarily in retail and the public sector to serve the new population.
 - b. Addition of this quantity of service jobs to support the new housing will only add to Loudoun’s workforce housing shortage.
3. The current plan text is largely a set of aspirations about “workforce” and “affordable” housing without national and regional context, or pragmatic assessment of Loudoun’s situation. The entire Chapter was written without reference to implication of constraints, resulting in an unrealistic view and expectations through 2040.
 4. Chapter is devoid of facts and figures and data in general as to current housing situation and future. Lacks hard data on current housing buildout, pipeline, by-right, and potential increments of additional growth. Elements are necessary as a baseline for this Comprehensive Plan.
 5. Text repeats the false statement that Loudoun must have large scale housing available if we are to have a robust economy. It provides no analysis or policies defining the specific means that “unmet needs” will be included in development applications.
 6. Lengthy discussion and emphasis on “Unmet Needs” and Affordable housing is misleading and actually understates current County Programs; there is no reference to the point that over 75,000 houses have been built in the last 20 years resulting in a small quantity of Affordable Dwelling Units (ADUs) and affordable housing.
 7. Chapter ignores the actual process whereby housing is created in Loudoun which will limit “innovation” and “design.”
 8. Text calls for a wide variety of incentives and in-kind contributions from the County to support workforce and affordable housing without definitions and assessing the overall impact on County fiscal policy and fact that tax dollars are fungible among many needs.
 9. Chapter does not state/include the total fiscal impact potential of policies and actions, including the possible need to raise taxes or switch fund sources.

C. RECOMMENDATIONS / ACTIONS REQUIRED:

1. Re-focus Housing Chapter 4 to reflect “Managed Growth to Regional Demand Levels,” with “Quality of Life a Priority.”
 - a. Include in the plan a reduced, sustainable, affordable growth rate instead of attempting to meet in excess of 25% of the Metropolitan Council of Government (MCOG) regional growth of 100,000 by the year 2040.
2. Prioritize definition and implementation of a Strategic Plan for Affordable Housing before adopting any of the other miscellaneous proposed “actions” in the Housing Chapter.
 - a. Policy 3, Strategy 3.1, Action A should be made the primary Policy 3 statement:

Develop an affordable housing strategic plan that specifically identifies strategies, actions, programs, and best practices to address the County’s current and future unmet housing needs. The plan would include estimates on unmet housing needs, establish development targets, and evaluate how housing programs address those needs every five years.



CHAPTER 5: Economic Development

A. SUMMARY / GENERAL OBSERVATIONS

The policies, strategies, and actions focus on the processes and methods by which the County hopes to continue its robust economic growth. It does not set priorities or projections for specific economic development and is nearly silent on the implications to the County of the massive development of the Data Center industry over the last 10 years.

1. The Chapter cites the success of the County in economic development over the last five years (344 deals, representing \$13.5 billion investment, and 16,280 jobs). It notes that 123,000 persons commute out of County to work.

B. CURRENT DRAFT ISSUES

1. Comparing to the Economic chapter of the 2000 RGP, the only new Loudoun 2040 material are slight mentions of the Metro System, workforce housing, the changing desires of millennials in the workplace. However, no detail plans on how to handle these critical elements are offered.
 - a. The Metro System is the top priority from an economic standpoint and a robust plan needs to be presented in the comprehensive plan to make sure the Metro areas are developed from a business perspective in the right manner.
 - b. A proper mix of commercial, entertainment and residential needs to be met in order for the Metro area to be financially viable.
2. The Economic Development chapter is presented as a standalone silo piece on economics without regard to the other factors contained in the comprehensive plan.
 - a. The chapter needs to describe how economic development will work within the housing/land use, transportation, environmental, quality of life and other areas of the plan. Clear defining statements or parameters need to be set to avoid negative impact on the other factors.
3. Data Centers are described as the key factor in economic development with not enough thought given to diversification and sustainability over a 20 year *planning* period. The chapter leaves one to believe that the “target business cluster” approach will work when it has not worked up to this point in time.
 - a. A much more detailed plan for diversification needs to be presented. Clearly, one of the reasons few companies have considered moving into Loudoun is the high cost of commercial real estate driven by data centers. Identifying certain commercial land areas for non-data center development would lower the cost of those lands and make them available to office or other types of commercial development.
 - b. The sustainability aspects of continuing to depend on data centers needs to be explored given their huge electrical usage, impact on communities and impact on our ability to attract different business types because land cost are driven up by data centers.



CHAPTER 6: Fiscal Management & Public Facilities

A. SUMMARY / GENERAL OBSERVATIONS

Chapter 6 describes land use planning and fiscal management as an “integral process,” and is the only place in the entire draft Plan in which Public Facilities are mentioned. The Fiscal Management Section is also descriptive of existing management processes which are widely recognized as excellent. The Chapter mostly contains descriptions of short-term, process-oriented budgeting (such as on capital intensity factors, needs assessments and the CIP).

B. CURRENT DRAFT ISSUES

1. There are no projections of needs or land area requirements or any other discussion of future policies and constraints, though the TischlerBise reports cover these issues in some detail.
2. The draft 2040 Plan does not include estimates of its public costs nor how to pay for them. There are no references to the County Service Plans, or how existing and future deficits will be resolved.
3. The Utilities and Infrastructure section also is essentially just descriptive and there is no clear linkage between this discussion and any of the Land Use Policy Areas.
4. Parks and Trails are treated as a subset of only one policy on Open Space. There is little emphasis on the need for Parks and Trails and appears to be a by-product of development after housing is determined on a specific parcel.
 - a. The result is only “pocket parks” and other poorly planned overall park architecture. Land designated for parks and community centers should occur prior or at least at the same time as development approvals.

C. RECOMMENDATIONS / ACTIONS

1. There are no specific recommendations for actions as a part of this Plan review. These issues are very sensitive, and therefore each future Board of Supervisors needs to analyze and take decisions independently.
2. Proposed changes provided in the detailed Policy/Strategy/Action summary strengthen the integration between land use and fiscal policy by, rather than “linking” the two, ensuring that the Plan and its implementation are carried out in compliance with the County’s established Fiscal Policy.
3. The changes also propose that the County progressively adopt a fiscal revenue strategy that considers raising taxes primarily from existing property rather than being mainly dependent upon new land development to meet the growth in expenditures under the Plan.
4. Parks are a critical component of land use and should be planned before development takes place. Chapter 2 is about land use and which lands should be dedicated to what type of use.
 - a. Move the Policies, Strategies and Actions related to Parks and Trails to Chapter 2, Quality Development to improve the establishment of an overall architecture of parks and recreation land use.



CHAPTER 8: Countywide Transportation Plan (CTP)

A. SUMMARY / GENERAL OBSERVATIONS

There is general support from Coalition input providers for the overall Transportation Plan, however the TischlerBise Fiscal Analysis and Kimley Horn Consultants Travel Demand Model Run Results demonstrate that the relationship between the land use development and on-time build out of essential infrastructure has not been adequately analyzed or coordinated.

B. CURRENT DRAFT ISSUES

1. Exclusion of transportation-related costs in the TischlerBise Fiscal Analysis⁶ as well as the Kimley Horn Consultant’s conclusion that “a global comparison of the two networks show that the change in congestion is nominal,”⁷ identifies two fundamental flaws:
 - a. The combined reports provide no overall cost analysis to assess if Plan is financially feasible in 20-year time frame, and
 - b. does not set out approximate time schedule for completion of the projects.
2. Language is vague as to whether increasing density in the TPA will increase traffic congestion on Route 50 or other major roads. It does not take into account that there are no plans to expand existing roads in neighboring Prince William and Fairfax counties. The premise for permitting greater densities, therefore, is not demonstrated.
3. Short term economic focus – Data Center “sprawl,” overreliance, fiscal risk for future.

C. RECOMMENDATIONS / ACTIONS REQUIRED

1. Integrate transportation costs and impacts with land use decisions, and correct fundamental omission of transportation impacts to fiscal analysis.
2. Carefully examine whether increased density in any of the areas proposed for up-zoning would cause increased traffic congestion. Any areas that would significantly increase traffic congestion should be excluded from potential increased density (e.g., TPA).
3. Establish long-term plans for data centers in regards to fiscal impacts and placement.
4. Implement Sustainable Fiscal Revenue Policy vs. equalized tax rate for long-term fiscal viability.

⁶ TischlerBise, February 1, 2019 Fiscal Analysis Report, p. 4: “The transportation costs included in this analysis do not reflect an increase in transportation capital needs proportionate to the increase in development and population . . . Fiscal results are pending analysis of whether and to what extent additional transportation infrastructure is needed to accommodate forecasted growth.”

⁷ Kimley Horn, January 31, 2019, “Travel Demand Model Run Results for Planning Commission Land Use,” p. 6.



LCPCC Analysis of Envision Loudoun Public Input

Analysis of Total Comments By Major Category

- **Built Environment = 15%**
- **Transportation = 14.2%**
- **Environment/Agriculture = 11.6%**
- Life Style/Art/Ent. = 8.6%
- Government Planning = 8%
- Green Infrastructure = 7.2%
- Economy = 7%
- Community Infrastructure = 7%
- Housing = 6.8%
- Schools = 3.9%
- People = 3.2%
- Fiscal Mgmt. = 2.6%
- Aesthetics = 1.2%
- Historic Preservation = 1.2%
- Energy = 0.7%
- Internet = 0.6%
- Seniors = 0.6%
- Data Centers = 0.4%
- Dulles Airport = 0.2%

Analysis of Built Environment Comments

- **546 comments (43.5% of total comments) about growth.**
- **48.2% wanted less growth,**
- **30.5% wanted to retain current suburban, transition and rural areas with smart/controlled growth and**
- **21.3% wanted more growth (vast majority wanted this held to the Silverline area).**
- 117 comments (9.3% of total comments) calling for more affordable housing (Affordable housing not limited to low wage earner housing. Many middleclass people wanted less expensive housing also)
- 46 comments (3.7% of total comments) calling for more revitalization efforts
- 24 comments (1.9% of total comments) on need for more senior housing
- 19 comments (1.5% of total comments) on need for mixed use development
- 7 comments (0.5% of total comments) on a need for taller buildings (especially in Silverline area)

Analysis of Silver Line Comments

- **Desire urban center/mix development around Silverline = 31%**
- **Higher density around Silverline = 23%**
- Better access to Silverline = 18%
- Extend Silverline to Leesburg = 10%
- Remainder of comments were minor (less than 5% per area of comment)



GENERAL COMMENTS ON HOUSING

- 117 comments on a need for more affordable housing
- 46 comments on a need for utilization of in-fill or revitalization
- 24 comments on a need for more senior housing
- 7 comments on a need for allowing taller buildings (especially in the Silverline area.
- 19 comments on a need for mixed use development

BUILT ENVIRONMENT ANALYSIS

Growth/Density by Major Area of the County*

- Rural More Growth/Density = 0 (100% of comments were for less or the same growth/density)
- Rural Less Growth/Density = 55
- Rural Same Growth/Density = 87
-
- Suburban More Growth/Density = 14 (61% of comments were for more growth/density and 39% were for less or same growth/density)
- Suburban Less Growth/Density = 4
- Suburban Same Growth/Density = 5
-
- Transition More Growth/Density = 14 (89% of comments were for less growth/density and 11% were for more growth/density)
- Transition Less Growth/Density = 59
- Transition Same Growth/Density = 57
-
- Towns More Growth/Density = 35 (78% of comments were for more growth/density and 22% were less or same growth/density)
- Towns Less Growth/Density = 7
- Towns Same Growth/Density = 3
-
- Silverline More Growth/Density = 35 (95% of comments were for more growth/density and 5% were for the same level of growth/density)
- Silverline Less Growth/Density = 0
- Silverline Same As Suburban = 2
-
- Overall County More Growth/Density = 18 (89% of comments were for less or same growth/density)
- Overall County Less Growth/Density = 138
- Overall County Same Growth/Density = 12 and 11% for more growth/density

*Notes: Overall County numbers were derived from comments where growth/density were mentioned specifically with no indication of a specific area. When the term ‘Western’ was used and the comment implied both rural and transition areas, the comment was counted in both areas. Comments that mentioned rural or transition specifically were counted in the appropriate area. Comments carried in a specific area were not counted in the overall County count.

General data on area analysis: In total there were 545 specific statements in the comments under Built Environment that dealt with housing by area. Of these 545, 48% called for less growth/density, 31% called for the same level of growth/density that currently exists and 21% wanted more growth/density (note most of the more growth/density numbers called for it in the Silverline area).