

ZOC Comments – Chapter 2: Zoning Districts 10/20/21 – 11/1/21

| ID | Section |
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| #5737 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Rich Brittingham Tags: public rbrittingham@dewberry.com Date: 11/1/2021 | M. On-Site Amenities - can these amenities be located to serve multiple buildings? (plaza or park next to two 50k SF buildings?) |
| Needs Followup | |
| #5753 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date: 11/1/2021 | Noted. Staff will discuss and take under consideration. |
| #5738 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Rich Brittingham Tags: public rbrittingham@dewberry.com Date: 11/1/2021 | Tree Canopy - Tree canopy should be district wide and not per site plan - these districts will be developed over time and its likely the canopy will be achieved in large groups somewhere on site which may not be a part of the individual site plans for each building, etc..... implementation of this requirement can happen but needs accommodation for how plans are reviewed and processed in the COunty. |
| Needs Followup | |
| #5752 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date: 11/1/2021 | Noted. Staff will revisit and take this under consideration. |

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| #5741 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Rich Brittingham Tags: public rbrittingham@dewberry.com Date:11/1/2021 | Min. height requirements needs to allow for phased development and interim uses as placeholders for ultimate high density development |
| Needs Followup | |
| #5751 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/1/2021 | Noted. Staff will take this under consideration. |
| #5736 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Rich Brittingham Tags: public RTBritt13@yahoo.com Date:11/1/2021 | Min. FAR requirements needs to allow for phased development in which first phase falls below min. FAR |
| Needs Followup | |
| #5754 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5730 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Rich Brittingham Tags: public rbrittingham@dewberry.com Date:11/1/2021 | Min district size doesn't work in the UTC area around Innovation Station Metro where multiple small parcels may not be able to be assembled. Modifications should be available or else development could be stalled. |
| Needs Followup | |
| #5755 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5811 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Rich Brittingham Tags: public rbrittingham@dewberry.com | additionally, many areas in Urban Policy Area are already zoned, and not likely to be rezoned to UT. so language stating "The initial district size must be 40 acres or more. Notwithstanding the provisions of |

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| Date:11/3/2021 | Section 7.08.x, the minimum district size is not modifiable." hinders any ability to apply these regulations to smaller unassembled parcels |
| Needs Followup | |
| #5834 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/3/2021 | Thank you, we will continue to discuss internally |
| #5696 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | Table 2.01.01-2. UM ADJUSTED BASE FLOOR AREA RATIO, Reference 1: It is not possible to comment on this line in the table until Section 8.01 is written and offered for review. Please hold open this table for comment until Section 8.01 is provided. |
| #5756 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. |
| #5695 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | Table 2.01.01-1 UT/UM DISTRICT DIMENSIONAL STANDARDS: Is it necessary to specify Building Height Minimums? The Board of Supervisors has recognized that there may be a period of transition from today to the day of true high-rise buildings at Metro. Specifying buildings at 70' or higher requires concrete and steel construction, the highest cost construction there is. To allow for transition time and to allow for affordable housing during the transition time, would it be better to not specify building minimums, especially in the UT at this time? |
| Needs Followup | |
| #5757 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |

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| #5694 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | Packet P. 13. For general knowledge, why was the Final Development Plan (FDP) requirement removed? AND Table format for dimensional standards is excellent! |
| #5812 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | FDP procedure removed based on internal review and comment. The FDP is very similar to a site plan. Considering amount of information typically required during the rezoning process/on a CDP, as well as the specificity of district regulations for the urban policy area districts, the detailed FDP is redundant but also adds complication to the development process since it is not an engineered plan. |
| #5692 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:10/31/2021 | Table 2.01.01-3 is confusing in that the math does not seem to add up relative to Residential, Nonresidential and Public/Civic. Or is Public/Civic (in this table) considered part of Nonresidential? |
| Needs Followup | |
| #5758 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will revisit to clarify. |
| #5691 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:10/31/2021 | The Plan Map for the Urban Policy Areas correctly identifies the core at the Metro Stops and its surrounding subareas. Why is there a requirement for a 40 acre minimum district, when the map already identifies the district? Why not simply refer to the Plan Map. Projects will either be in the core or the fringe because of their locations relative to the Metro stops. The critical aspects are design of streets, sidewalks, relationships between them, etc. |
| Needs Followup | |
| #5759 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |

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| #5690 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:10/31/2021 | Relative to Pedestrian Walkways, 'requiring' the shortest route should simply be 'encouraged'. I can easily imagine situations where the most direct path would be detrimental to the use of open space. This situation is referenced repeatedly and should be treated the same with 'encouraged' being the operative word. |
| #5760 | 2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Revised, but to be reviewed. |
| #5744 | 2.01.02 Urban Employment – UE |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:11/1/2021 | As above, Section G, Land Use Arrangement should recognize the flood plain as the major focal point around which developments are organized and to which they relate, as well as to each other. |
| Needs Followup | |
| #5761 | 2.01.02 Urban Employment – UE |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5743 | 2.01.02 Urban Employment – UE |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:11/1/2021 | As I mentioned earlier, the Broad Run flood plain is the major focal point of this district. Developers should organize their projects to relate to the Metro and this significant park. Thus, change District Subareas, B.1.d (focal point) to reflect this reality. I do not believe there is a need to create an artificial (or otherwise) focal point. |
| Needs Followup | |
| #5762 | 2.01.02 Urban Employment – UE |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |

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| #5742 | 2.01.02 Urban Employment – UE |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:11/1/2021 | Relative to minimum district size: Similar to my comment under Urban Transit Center, this district is defined on the Plan Map. I think this notion of a 40-acre minimum district size comes from the original ZOAG MUB language, where it is/was appropriate, because it could occur at many locations within the Suburban area. It is not needed or desirable here. |
| Needs Followup | |
| #5763 | 2.01.02 Urban Employment – UE |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5693 | 2.01.02 Urban Employment – UE |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:10/31/2021 | Since the Broad Run floodplain is such a dominant feature of this district, could an appropriate large, regional park (or other means of preserving the continuity and park value of the floodplain) be referenced as a specific objective? |
| Needs Followup | |
| #5764 | 2.01.02 Urban Employment – UE |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5748 | 2.02.01 Suburban Neighborhood – SN |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:11/1/2021 | Other Lot Requirements. Are not detached garages with apartments or simply detached accessory apartments desirable to help provide a greater variety of housing opportunities? If so, again, lots might need to be larger to accommodate them. |
| Needs Followup | |
| #5765 | 2.02.01 Suburban Neighborhood – SN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |

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| #5747 | 2.02.01 Suburban Neighborhood – SN |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:11/1/2021 | Variation of Lot Sizes. I think this is an issue identified in the Plan, to which I have objected. When lots are small, it is hard to vary the size in a meaningful manner. If we can allow larger lot sizes, then the variations are more easily achieved. |
| Needs Followup | |
| #5766 | 2.02.01 Suburban Neighborhood – SN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5746 | 2.02.01 Suburban Neighborhood – SN |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:11/1/2021 | Table 2.02.01-1, given that much of suburban Loudoun is developed, infill lots, if there are any should conform with the existing conditions of adjoining lots as to size and yards. A home placed 15' from the front will look out of place among homes set farther back. Worth checking into. |
| Needs Followup | |
| #5767 | 2.02.01 Suburban Neighborhood – SN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5745 | 2.02.01 Suburban Neighborhood – SN |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:11/1/2021 | In Table 2.02.01-1 must the lot size for SFD, SFA Duplex, Triplex, or Quadruplex be capped at 10,000 sf? Seems ok for SFD, but not so sure of the other configurations. |
| Needs Followup | |
| #5768 | 2.02.01 Suburban Neighborhood – SN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |

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| #5750 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:11/1/2021 | Maybe one answer to the problem of variation in lot sizes is to simply state that if there are 10 or more lots, they must include a variety of dwelling sizes/configurations with whatever lot size is needed to accommodate them. Also take note that expandability of dwellings may be desirable. If homes are jammed to tightly onto lots, there is no room for future expansion. The SCN perhaps should be seen as a potential as well as a reality from the outset. That also provides for variation. |
| Needs Followup | |
| #5769 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5749 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Kevin Ruedisueli Tags: public kevinruedisueliZOC@gmail.com Date:11/1/2021 | Table 2.02.02-1, can a 3000 sf lot accommodate both a SFD and the desired 'accessory dwelling'? What sort of setbacks will apply to detached garages and accessory dwellings? |
| Needs Followup | |
| #5813 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | Noted, staff will further evaluate potential of accessory dwellings on smaller lots, as well as yards for detached garages and accessory dwellings. |
| #5702 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.02.02.J SUBURBAN COMPACT NEIGHBORHOOD - SCN. SCN Alternative Location Criteria. What happens when a proposal meets 6 or 7 of the criteria, but not 8? |
| Needs Followup | |
| #5770 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | As written, each criteria must be met. Staff will review again and consider if this was the intent. |

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| #5701 | 2.02.02 Suburban Compact Neighborhood – SCN |
| <p>By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021</p> | <p>"2.02.02 Suburban Compact Neighborhood—SCN; J. SCN Alternative Location Criteria. 5.: Why must SCN be within ½ mile of public facilities with existing or planned capacity to serve the proposed development? The U.S. Department of Housing and Urban Development (HUD) has no such restriction on HUD supported housing? Virginia Housing has no such restriction for housing supported by Low-Income Housing Tax Credits (LIHTC). Transportation Policy of the Loudoun County Public School District states that middle school students can walk 1.0 miles and high school students can walk 1.25 miles before they are eligible to ride a school bus."</p> |
| #5772 | 2.02.02 Suburban Compact Neighborhood – SCN |
| <p>By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021</p> | <p>One of the purposes of this section is "Ensure public and civic amenities are provided or located within walking distance of each development." Providing reasonable walking distances encourages and implements this objective.</p> |
| #5700 | 2.02.02 Suburban Compact Neighborhood – SCN |
| <p>By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021</p> | <p>"2.02.02 Suburban Compact Neighborhood—SCN; J. SCN Alternative Location Criteria. 4.: Why must SCN be within ½ mile of employment options or neighborhood-serving retail and services? The U.S. Department of Housing and Urban Development (HUD) has no such restriction on HUD supported housing? Virginia Housing has no such restriction for housing supported by Low-Income Housing Tax Credits (LIHTC). Transportation Policy of the Loudoun County Public School District states that middle school students can walk 1.0 miles and high school students can walk 1.25 miles before they are eligible to ride a school bus."</p> |
| #5773 | 2.02.02 Suburban Compact Neighborhood – SCN |
| <p>By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021</p> | <p>One of the purposes of this section is "Ensure public and civic amenities are provided or located within walking distance of each development." Providing reasonable walking distances encourages and implements this objective.</p> |

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| #5699 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "2.02.02 Suburban Compact Neighborhood—SCN; J. SCN Alternative Location Criteria. 3.: Why must SCN be within ¼ of an existing or planned metro or bus line? The U.S. Department of Housing and Urban Development (HUD) has no such restriction on HUD supported housing? Virginia Housing has no such restriction for housing supported by Low-Income Housing Tax Credits (LIHTC). Transportation Policy of the Loudoun County Public School District states that middle school students can walk 1.0 miles and high school students can walk 1.25 miles before they are eligible to ride a school bus." |
| #5774 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | One of the purposes of this section is "Ensure public and civic amenities are provided or located within walking distance of each development." Providing reasonable walking distances encourages and implements this objective. |
| #5698 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "2.02.02 Suburban Compact Neighborhood—SCN; J. SCN Alternative Location Criteria. 2.: Why must SCN be within ½ mile of a mixed use development or along a transit corridor? The U.S. Department of Housing and Urban Development (HUD) has no such restriction on HUD supported housing? Virginia Housing has no such restriction for housing supported by Low-Income Housing Tax Credits (LIHTC). Transportation Policy of the Loudoun County Public School District states that middle school students can walk 1.0 miles and high school students can walk 1.25 miles before they are eligible to ride a school bus." |
| #5771 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | One of the purposes of this section is "Ensure public and civic amenities are provided or located within walking distance of each development." Providing reasonable walking distances encourages and implements this objective. |

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| #5697 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.02.02 Suburban Compact Neighborhood—SCN; J. SCN Alternative Location Criteria: SCN is supposed to be the place, within the SPA, where multi-family projects can be built and at densities sufficient to make significant contributions to the goal of 16,000 new attainable housing units. Therefore, how is it logical to significantly limit the possibility of using the SCN Place Type by imposing Location Criteria that are not supported by housing industry standards? |
| Needs Followup | |
| #5775 | 2.02.02 Suburban Compact Neighborhood – SCN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5705 | 2.02.03 Suburban Mixed Use – SM |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.02.03.B SUBURBAN MIXED USE. District Subareas. For the UPA "inner core" and "outer core" were defined by distance (1/4 mi, and 1/2mi). Are there similar distances (vs. acres, setbacks) to describe "Mixed use Center Core" and "Mixed use Center Fringe?" |
| Needs Followup | |
| #5776 | 2.02.03 Suburban Mixed Use – SM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | There are not currently. Staff will take under consideration. |
| #5704 | 2.02.03 Suburban Mixed Use – SM |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | Table 2.02.03-2. SUBURBAN MIXED USE. Adjusted Base Floor Area Ratio. Reference 1: It is not possible to comment on this line in the table until Section 8.01 is written and offered for review. Please hold open this table for comment until Section 8.01 is provided. |
| #5777 | 2.02.03 Suburban Mixed Use – SM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. |

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| #5703 | 2.02.03 Suburban Mixed Use – SM |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.02.03 SUBURBAN MIXED USE. Purpose. Although the Purpose and objective list is helpful, they should not include highly subjective criteria that is more "opinion," such as: "An attractive environment in which to live, work and play" and "high-quality design and construction." The concepts are fine, but how would they be evaluated during review of an application? |
| Needs Followup | |
| #5778 | 2.02.03 Suburban Mixed Use – SM |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5706 | 2.02.04 Suburban Commercial – SC |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.02.04-1. SUBURBAN COMMERCIAL. Dimensional Standards. Why was the "adjacent to Residential Districts or Res uses" changed from PD-CC 100' yard down to 50' yard? |
| #5814 | 2.02.04 Suburban Commercial – SC |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | A general intent of the 2019 General Plan is to achieve more compact, walkable development pattern. Additionally, the smaller commercial development sizes and more pedestrian oriented development pattern is intended to be integrated into residential districts, rather than separated with large swaths of land. Transition standards to be provided in development standards will regulate the transition between commercial and residential uses to minimize impacts. |
| #5707 | 2.02.05 Suburban Employment – SE |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.02.05-1 SUBURBAN EMPLOYMENT. Dimensional Standards. Why was the "adjacent to Ag and Res districts or Res uses" changed from PD-IP 75' to 50'? |
| Needs Followup | |
| #5815 | 2.02.05 Suburban Employment – SE |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | Suburban Employment consolidates PD-IP and PD-OP. The yard requirement for PD-OP is 50'. Since not all uses in the SE district would have the impact of the uses permitted in PD-IP, the lesser yard is applied. Staff will further evaluate an increased yard adjacent to residential districts for uses with greater impacts on residential uses, such as data centers and include this requirement in the Use-Specific Standards as appropriate. |

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| #5708 | 2.02.06 Suburban Industrial – SI |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.02.06-1 SUBURBAN INDUSTRIAL Dimensional Standards. Generally, why was the yard standard "Adjacent to Roads" changed from 35' to 30'? |
| #5816 | 2.02.06 Suburban Industrial – SI |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | A yard adjacent to roads that includes a 25 foot parking setback and a 35 foot building setback is a typical requirement in PD districts. The 2019 GP does not support parking between a building and the road. To align with the Plan, staff eliminated the differentiation between the building and parking setbacks since it allows parking to be closer to the road than the associated building and made a general 30 foot yard along roads requirement. Note that this yard would not apply if a greater setback is required by the Road Corridor Setbacks in 5.07.02 (currently Table 5-1403(B)). |
| #5713 | 2.02.07 Suburban Mineral Extraction - SME |
| By: Rich Brittingham Tags: public rbrittingham@dewberry.com Date:11/1/2021 | for all Mineral Extraction districts: - Open space min of 50% not appropriate/confusing for mineral extraction. o Does ultimate reclamation plan count towards the ultimate open space requirement? Ultimately these uses all are turned into 100% open space lakes etc.. after mining is complete o Despite language in the comprehensive plan, we need to be encouraging efficient use of these sites, maximizing yield, if open space means 50% must remain undisturbed, that is in conflict with how these sites should be treated. |
| Needs Followup | |
| #5779 | 2.02.07 Suburban Mineral Extraction - SME |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5739 | 2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1 |
| By: Rich Brittingham Tags: public rbrittingham@dewberry.com Date:11/1/2021 | I do not think figures and sketches should be included in the ZO for lot layouts unless it is clear they are illustrative only. |
| #5780 | 2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1 |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. If and when they are added, staff will ensure it is clearly for illustrative purposes only. |

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| #5711 | 2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1 |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.03.01.F. TRANSITION LARGE LOT NEIGHBORHOOD. Siting of Open Space. Is there a way to make it more clear in F that the open space "provided on lots in the subdivision" must be contiguous? |
| Needs Followup | |
| #5781 | 2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1 |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take this under consideration. |
| #5710 | 2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1 |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "2.03.01-1. TRANSITION LARGE LOT NEIGHBORHOOD. Dimensional Standards. Why were yard setbacks ""adjacent to Roads"" changed from 35' to 30'? TR-10, TR-3 and TR-1 has yard standards of ""no building shall be located within 25 feet of any property line."" How does than now compare with the Front (20/12/10) Side (10/7/5) and Rear yard (25/25/25) dimensional standards?" |
| #5817 | 2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1 |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | <p>Staff added the Yards adjacent to Roads dimensional standard because it did not exist in the current district requirements. Therefore, if a road was not subject to the Road Corridor Setbacks in Table 5-103(B), then the front yard requirement of 10-20 feet (depending on district) would apply. The 30 ft yard along roads (unless a greater setback is required by Section 5-.07.02) addresses this missing regulation.</p> <p>The general 25 foot yard from any property line vs the front/side/rear yard standards depends on when the lot came into existence. The 25 foot yard applies only to lots that existed on January 7, 2003. The front/side/rear yard requirements apply to new, subdivided lots created after this date and implement the TR (to become TLN) development pattern.</p> |

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| #5709 | 2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1 |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.03.01 TRANSITION LARGE LOT. Purpose. Bullet #9 "Nieghborhood-3" misspelling. |
| #5782 | 2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1 |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Revised. Thank you. |
| #5712 | 2.03.02 Transition Small Lot Neighborhood – TSN |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.03.02.I TRANSITION SMALL LOT NEIGHBORHOOD. Siting of Open Space. Is there a way to make it more clear in I. that the open space "provided on lots in the subdivision" must be contiguous? |
| Needs Followup | |
| #5783 | 2.03.02 Transition Small Lot Neighborhood – TSN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take this under consideration. |
| #5714 | 2.03.03 Transition Compact Neighborhood – TCN |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.03.03.F. TRANSITION COMPACT NEIGHBORHOOD. Siting of Open Space. Is there a way to make it more clear in F that the open space "provided on lots in the subdivision" must be contiguous? |
| Needs Followup | |
| #5784 | 2.03.03 Transition Compact Neighborhood – TCN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take this under consideration. |

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| #5715 | 2.03.05 Transition Light Industrial – TLI |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 2.03.05-1. TRANSITION LIGHT INDUSTRIAL. As this district contains data centers, is 75' "adjacent to ag and residential districts or res uses" sufficient based on feedback from public input? |
| #5818 | 2.03.05 Transition Light Industrial – TLI |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | The 75 foot yard is the same as the PD-IP zoning district requirement. In addition to this yard, when data centers are adjacent to certain zoning districts including residential uses, the buffer must be a Buffer Yard Type C with required plantings located on an earthen berm that has a minimum height of six (6) feet and shall not have a grade steeper than 2:1 (Section 5-664(E)(1) to become Section 3.06.06.02.F.1). Regardless, staff will evaluate additional yard requirements considering the location in the Transition Policy Area. |
| #5716 | 2.04.01 Agricultural Rural North – ARN |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "2.04.01. AGRICULTURAL RURAL NORTH. Purpose. The following bullet points confirm the requirement to review uses and use-specific standards for consistency, compatibility and mitigation of impacts: -- Allow for a broad range of rural economy uses, including (agriculture, horticulture and animal husbandry), agriculture support and services associated with ongoing agricultural activities, and other uses that can be developed in ways consistent with the rural character of the ARN district through mitigation or other standards; -- Promote consistency between residential development and rural economy uses through lower density residential development or clustering of residential development; -- Ensure that the rural economy uses are compatible with any existing permitted residential development; How and when will review for consistency, compatibility and mitigation be performed?" |
| #5785 | 2.04.01 Agricultural Rural North – ARN |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Staff are continuing to draft new sections and revisit old sections while reviewing for consistency, compatibility and mitigation. It is an iterative process. |

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| #5717 | 2.04.02 Agricultural Rural South – ARS |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "2.04.02. AGRICULTURAL RURAL SOUTH. Purpose. The following bullet points confirm the requirement to review uses and use-specific standards for consistency, compatibility and mitigation of impacts: -- Allow for a broad range of rural economy uses, including traditional and new agricultural uses (agriculture, horticulture and animal husbandry), agriculture support and basic services directly associated with ongoing agricultural activities, and other uses that can be developed in ways that are consistent with the rural character of the RS District through mitigation or other standards; -- Promote consistency between residential development and rural economy uses through lower density residential development or clustering of residential development; -- Ensure that the rural economy uses are compatible with any existing permitted residential development. How and when will review for consistency, compatibility and mitigation be performed?" |
| #5786 | 2.04.02 Agricultural Rural South – ARS |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Staff are continuing to draft new sections and revisit old sections while reviewing for consistency, compatibility and mitigation. It is an iterative process. |
| #5718 | 2.04.03 Rural Commercial – RC |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "2.04.03. RURAL COMMERCIAL. Legacy district, therefore only applies to current RC NOT located in an existing Village? Confirm no expansion of RC? Assuming dimensional standards are based on public input?" |
| #5819 | 2.04.03 Rural Commercial – RC |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | Section 2.04.03.A.1. states, "Expansion of the RC district is not permitted after the adoption date of this Ordinance," so the draft regulation does not allow expansion of RC. Front yard and side yard have been increased and lot coverage and building height decreased to reflect a more rural development pattern. and to align with Rural North/Rural South Place Type. |

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| #5740 | 2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3 |
| By: Rich Brittingham Tags: public rbrittingham@dewberry.com Date:11/1/2021 | Avoidance of Certain Street Types: - this is not written like ZO code, this is written like policy. - remove or state that these are street types are precluded. (I vote to remove) |
| Needs Followup | |
| #5787 | 2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3 |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/2/2021 | Noted. Staff will take under consideration. |
| #5720 | 2.07 Legacy Zoning Districts |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | In general, are there no changes for Legacy Districts? If not, can you highlight (red-line text) any changes? |
| #5820 | 2.07 Legacy Zoning Districts |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | In general, revisions to Legacy Districts include reformatting to new district format, moving dimensional standards to tables, updating district and other internal references, consolidating similar districts (e.g., R-1, -2, -3 and JLMA-1, -2, -3) into one set of regulations, and revising shall to must or other mandatory language. Considering that not all revisions would be captured in track changes (e.g., reformatting and moving requirements to tables) and others would become overly complicated and difficult to follow, we did not track changes in Legacy Districts similar to other draft districts. |

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| #5719 | 2.07.01 Planned Development - Housing - PD-H |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "2.07.01. PLANNED DEVELOPMENT - HOUSING. G. Does the ""SE Uses"" stand for ""Special Exception Uses?"" If so, then the acronym should be spelled out. Generally, are there any significant changes from current zoning for this section? If so, can you highlight them?" |
| #5821 | 2.07.01 Planned Development - Housing - PD-H |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | SE = Suburban Employment, the term of art is established in 2.07.01.3.B. In general, revisions to PD-H are limited and include reformatting to new district format, updating district and other internal references, and revising shall to must or other mandatory language. Considering that not all revisions would be captured in track changes (e.g., reformatting and moving requirements to tables) and others would become overly complicated and difficult to follow, we did not track changes in Legacy Districts similar to other draft districts. |
| #5735 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 4.06.D.12. VCOD. STREET TREES. Support language 100%. Thank you. |
| Needs Followup | |
| #5734 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "4.06.D.11. VCOD. SIDEWALKS. Allowed if appropriate in specific village. Some have, some do not. Can a requirement be for existing pattern to be considered (in advance of Small Area Plans) for that village? 4.06 D b Delete. Sidewalks should never be REQUIRED in a village." |
| Needs Followup | |
| #5822 | 4.06 Village Conservation Overlay District |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/3/2021 | Noted. Staff will take under consideration. |

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| #5733 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 4.06.D.10) VCOD. CONNECTIONS TO EXISTING STREETS. Extending existing streets good as long as cul de sac does not result. How will that be prevented? Each village is unique so this must be addressed in each village's Small Area Plan. "Continue the predominate street pattern in the village" -- This differs for each village. How will this prevent development of a subdivision within a village? 10a 1 Delete "if possible to avoid". Then "Developments must be designed so road connections avoid regulated natural resources." What does 10 b 2 mean? Does 10c prevent cul de sac? |
| Needs Followup | |
| #5825 | 4.06 Village Conservation Overlay District |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | Noted. Staff will take under consideration. |
| #5732 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 4.06.D.9. VCOD. GARAGE LOCATIONS. Agree with set back of 20 feet, front loading, but need to add that to hold no more than 2 vehicles and detached only garages should be permitted. Attached garages were not originally found on historic properties. Can this requirement be added? |
| Needs Followup | |
| #5826 | 4.06 Village Conservation Overlay District |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | Noted. Staff will take under consideration. |

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| #5731 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 4.06.D.1. VCOD. BUILDING HEIGHT. Height of new building no greater than height of any building on same side of street within 150 yards. If large oversize structures are to be considered for a village (e.g., fire house, schools), Small Area plan must be consulted as well as community. How can this be made a requirement in the zoning ordinance? |
| #5827 | 4.06 Village Conservation Overlay District |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | 4.06.D.1.a. "The building height is not permitted to exceed the maximum building height permitted in the underlying zoning district." This regulation will limit height to 35 feet consistent with RHV Place Type. Additional analysis completed with small area plans may reveal that a lesser maximum height is more appropriate and amendments to the Zoning Ordinance based on the small area plans can be made at that time. |
| #5729 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 4.06. VCOD. PURPOSE. District Boundaries. Need to add VCOD overlay to other villages: Morrisonville, Unison, Willisville. Delete Ashburn. Change Aldie Mt to Bowmantown. How would new ones be added in the future? Would a CPAM be required for each village to be added or can several villages be added under same CPAM? |
| #5829 | 4.06 Village Conservation Overlay District |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | Evaluation of the addition or deletion of other villages will be part of the small area plan process. Both Bowmantown and Aldie Mountain are referenced in 4.06.B.4. A CPAM process is necessary. It is feasible that several or all village small area plans could be part of on one CPAM process. |
| #5728 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "4.06 VCOD. PURPOSE. Regarding, ""Maintain areas of open space and natural areas on the perimeter of the villages to retain a hard edge and visual separation"" Villages are very supportive of this requirement. How will this be accomplished? Will this open space be inside the VCOD boundaries? Will some boundaries be expanded to enable this?" |
| #5828 | 4.06 Village Conservation Overlay District |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | In current ZO rewrite process, we will ensure Road Corridor Setbacks pursuant to 5.07.02 require a setback from roads to the edge of the RHVs/VCOD. Additional protections will be evaluated as part of the small area plans. |

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| #5727 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "4.06 VCOD. PURPOSE. Regarding, ""Ensure new commercial and residential construction is designed to complement surrounding properties and maintain existing development pattern within each village by: Respecting each village's historic precedents.....and considering the context of each village's historic buildings"" LHVA likes the language but is concerned about enforcement, evaluation and density to achieve. Will this reduce density then to accomplish this? How will this be enforced? Who evaluates? " |
| Needs Followup | |
| #5830 | 4.06 Village Conservation Overlay District |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | Noted. Staff will take potential reduction in density, enforcement, and evaluation questions under consideration. |
| #5726 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 4.06 VCOD. OVERALL. If more than one overlay covers a property, which language prevails? |
| Needs Followup | |
| #5831 | 4.06 Village Conservation Overlay District |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | It is likely that other overlays will regulate different development standards than VCOD standards. Regardless, staff will evaluate whether conflicts could arise and clarify how other overlays would apply. |
| #5725 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 4.06 VCOD. OVERALL. Villages concerned about impact on village fabric with approval of Short Term Rentals and impact on availability Affordable Housing. Can STRR be EXCLUDED from Rural Historic Villages, primarily STRR-Commercial Whole House? |
| #5832 | 4.06 Village Conservation Overlay District |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | To be addressed with STRR ZOAM. Staff notified STRR ZOAM project manager of comment. |

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| #5724 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 4.06 VCOD. OVERALL. If current parcels on well and septic, will water studies be required to ensure availability of these resources after new development complete? |
| #5838 | 4.06 Village Conservation Overlay District |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/3/2021 | As currently written, no. Chapter 6 of the FSM (6.200) requires hydrogeologic testing for subdivisions and other specific uses meeting certain requirements. A DOAM to update the FSM will occur as part of, or after the ZOR, and changing the requirements could be considered at that time. |
| #5723 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | 4.06 VCOD. OVERALL. Underlying zoning must be flexible to allow adaptive reuse of historic properties. At the same time, there can be no damage to historic fabric (Sec Standards of Rehab used). Recommend new zoning districts be created for historic villages. Density needs to be unique to each village per their Small Area Plan: e.g., there are small lots in Waterford but larger ones in St Louis. also, RC zoning density will not work in all villages |
| #5833 | 4.06 Village Conservation Overlay District |
| By: Kate McConnell Tags: public,staff kate.mcconnell@loudoun.gov Date:11/3/2021 | Staff are developing Adaptive Reuse standards as Development Standards. The remaining comments would be addressed through a future small area plan process. |
| #5722 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date:11/1/2021 | "4.06 VCOD. OVERALL. VILLAGE CONSERVATION OVERLAY DISTRICT (VCOD). It is understood that VCOD has been separated from the other ZOR Overlay Districts in review, and will have separate consideration during the development of Village Small Area Plans. However, to avoid an overall delay in mitigating current issues there are changes being recommended BEFORE or IN PARALLEL WITH Village Small Area Plan development. They include but are not limited the following that should be INCLUDED in current review PRIOR to Village Small Area Plans as they apply to Villages (to get the discussions started):" |
| #5839 | 4.06 Village Conservation Overlay District |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date:11/3/2021 | Noted. Thank you for review of this section. |

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| #5721 | 4.06 Village Conservation Overlay District |
| By: Maura Walsh-Copeland Tags: public Maura@Walsh-CopelandConsulting.com Date: 11/1/2021 | "4.06 VCOD. OVERALL. Each village is unique so will benefit from each having Small Area Plan (Community Plan) as recommended by 2019 Comprehensive Plan. Support from the county will be necessary to accomplish this. (Comp Plan, Rural Historic Villages, Section 1.1.B) When can we expect to start work on Small Area Plans for villages? What county department will provide support to villages so these Small Area Plans may be completed effectively? How do they become law?" |
| #5840 | 4.06 Village Conservation Overlay District |
| By: Ryan Reed Tags: public,staff ryan.reed@loudoun.gov Date: 11/3/2021 | Small Area Plans are necessary for villages, but are not on Zoning Rewrite members' current schedule. |

Charlie Houston's comments on Zoning Districts

I am late making comments on enCode so here they are as an email.

General: In several places I noted the paucity of comments or participation by ZOC members. My case might be typical - with a huge agenda packet to read, I simply missed the new text in enCode. In the future it would help to add "Note new text in enCode on which you can comment" in the email that distributes the agenda packe.

2.01.01 Urban Transit Center This is written as if this area was a blank slate, without such constraints as floodplain, parcel ownership and existing buildings. While I'll comment on the various topics, this is a fanciful, fruitless exercise.

* Before writing text, there should be a discussion of just what we want this area to look like, and what is attainable. I suggest Reston as an example. Do we want to require a standard tree species, such as zelkova? Do we want to make outdoor sculpture a signature element? Etc.

* Why suggest a grid pattern for streets? Let developers and their engineers decide. Grids can be monotonous. This ain't New York.

* One goal should be linkage to the Emerald Ribbons/LPAT trail network. (Such connections are given an FAR bonus but they should be mandatory.) This trail should be platted by staff and thus become something developers must address in their plans.

* Building Requirements: #8 An FAR of 2.0 in the inner core will not allow high-rise residential, which will probably be the primary development type. A 3-acre site would only allow 130,000 sf, while a 15-story residential tower (as an example) would easily fit on 3 acres and would contain a minimum of 225,000 sq. ft.

* #12 Maximum height around the Gateway Metro needs to be coordinated with the FAA for potential conflicts with Dulles air traffic.

* #12 "Building Height" needs a careful definition. I've seen it handled many different ways in different markets. I suggest coordinating with NAIOP to learn what the practice is here.

2.01.01-2 ADUs. I suggest different minimums for subareas. ADUs will be hard to develop in high-rise structure in the core, and easier as projects move further from the core.

* FAR bonuses don't seem worth much except in Urban Mixed-Use.

* 2.01.01 It's unrealistic to expect building owners to get a zoning permit for changes in tenant occupancy. Tenant mixes change all the time. Instead provide for periodic audits by the county to ensure future compliance.

* 2.01.01-3 Mix of Uses: Have you ever heard of “the market”? Here’s one example. In the Inner Core demanding 40-60% of use to be non-residential is totally impossible in today’s market. (There is no market in Loudoun for major office buildings.) Moreover, what are you attempting to accomplish? High-rise residential can be vibrant into the evening, while offices close at the end of the day.

* 2.01.01-3 G Vertical mix: What in the world are you trying to do? Let the market decide.

* H Public gathering spaces. Where are the development standards, esp. as to size?

* H Public gathering spaces. Does *al fresco* dining count? (It should.)

*2.01.01- I Land Use Arrangement. “*When adjacent to smaller dwellings, larger buildings must step down in height...*” This makes no sense at all. Also, where are the standards that define “stepping down”?

* 2.01.1 -L.5. Tunnels over a certain length should be lighted.

* 2.01.1 -M On-site amenities. I like this. Add “outdoor-scaled sculpture.” I’d also reduce the list so as to create a limited palette of what would be signature, consistent design elements.

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2.02.02 Urban Employment - Objectives: “Ensure high quality design...” is goal of the General Plan but ZOC has not really worked on it. Here, “good design” seems to be all about site planning an development, when the focus should be on building design. When people look at a large project, whether One Loudoun or Reston, they first see the buildings and form an opinion. While they might appreciate land planning and landscaping, those impressions are less emphatic than the impressions made by the buildings. That said, site planning, landscaping etc. are critical, but building architecture more defines a project or area.

Objective - use a grid design. Why, oh why??

Lot and building standards #10. The table shows 100 SQUARE FEET as he maximum height of a building. That makes no sense.

Open space #12 and #13. Are these areas the same, can they overlap or must a developer do both? Needs clarification.

2.02.02-I -4 Pedestrian Oriented Building Placement - I appreciate these goals about ground floor uses, but leave this up to developers. Moreover, these standards would be impossible to enforce as they would require prior approval of any leases obtained by the developer.

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Suburban Neighborhood. I will abstain from commenting on the SPA and TPA as I’m not familiar with them, have no stake in those areas, and trust he judgment of ZOC members who know those areas and have stakes there.

Suburban Compact Neighborhood. I will abstain from commenting on the SPA and TPA as I'm not familiar with them, have no stake in those areas, and trust the judgment of ZOC members who know those areas and have stakes there.

2.02.01 Suburban Employment area. I will abstain from commenting on the SPA and TPA as I'm not familiar with them, have no stake in those areas, and trust the judgment of ZOC members who know those areas and have stakes there.

I am surprised that comments on this area were made only by two residents of the RPA.

Suburban Industrial I have no comments but am disappointed that only one comment or observation was made.

Suburban Mineral Extraction. Ditto - only one comment was made.

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Transition Large Lot I will abstain from commenting on the SPA and TPA as I'm not familiar with them, have no stake in those areas, and trust the judgment of ZOC members who know those areas and have stakes there.

I will abstain from commenting on the TPA Small Lot as I'm not familiar with it, have no stake in those areas, and trust the judgment of ZOC members who know those areas and have stakes there.

Transition Compact Neighborhood, Transition Community Center, Transition Light Industrial, Transition Industrial and Transition and Transition Mineral Extraction as I'm not familiar with them, have no stake in those areas, and trust the judgment of ZOC members who know those areas and have stakes there. I am shocked that there is only one comment on the TPA Light Industrial as it includes data centers, a use that in some ways can be controversial.

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Rural Policy Area Districts

2.04.01 Agricultural Rural North. Note the words "Agricultural" and "Rural," which seem to be ignored when uses, density and standards were written.

Purpose #3 "Support the use of land for rural economy uses ...with residential uses allowed..."
Sacrilige! The economy uses are meant as adjuncts to residences and this statement has it backwards, Does this indicate a troubling mindset?

Purpose #5 This suggests lower densities, but I see no change in densities from the existing ZO, and it's these densities which have crippled the ARN.

Purpose #6 Yes, economy uses should be compatible with residential, but in many existing cases they are intrusive, not compatible. I suggest requiring a SPEX for most economy uses above certain thresholds. Western Loudoun should not become a drink-and-drive destination.

2.04.01 - C What is the logic of the principal-subordinate option? Can't it be eliminated?

2.04.01-1 3 Dimensional standards. Reduce the maximum size of a cluster lot from 4 acres to 2 acres. It seems that the rears of cluster lots is generally not developed and often not maintained. Reducing the maximum lot size will increase the open space. While this might require that some lots use alternative septic systems, the added cost would be passed along to the homebuyer.

2.04.01-1 #3. Change the length-width ratio of economy lots from 3:1 to 2:1. This will make economy lots much more suitable for agriculture.

2.04.01-1 #6 There must be significant variation in front yard setbacks to avoid having all the houses lined up in a row. Varying setbacks will improve cluster design. I suggest a mix of setbacks from 25 feet to 50 feet, with at least a 5-foot difference between adjacent houses, and with 25% of houses having setbacks of 30 feet or less and 25% of the houses having setbacks of 40 feet or more.

2.04.01-1 #9. I'm tilting at windmills on this one, but residents of the west really want density of cluster lots to be decreased to 10 acres per house.

2.04.01 - J It is critical to limit the permitted uses on rural economy lots. For example, inns would be fine but breweries would not be.

2.04.01 - J 2 b. The variation in lot sizes should be 5,000 sq. ft. The 1,500 sq. ft. variation is too small to have any impact on the appearance of cluster subdivisions.

ARS My comments on ARN apply to ARS with the exception of density of cluster lots.

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Rural Commercial. 2.04.03-1 enCode shows density at "4 dwelling units per acre." If this is a commercial district, why are residences permitted, and why at such a high density?

2.04.04 - 1. Village Residential. Have these provisions been aligned with the design guidelines for the various historic villages?

2.04.04 - 1 I don't have a detailed zoning map, so are the Village districts identical to the boundaries of the Historic District, or are they more expansive?

11.5.21