



## ZOAM-2020-0001-Zoning Ordinance Rewrite -- ZONING DISTRICT & VCOD COMMENTS

\*LCPCC Participating Organizations: Aldie Heritage Association, Bike Loudoun, Bluemont Citizens Association, Blue Ridge Mountain Civic Association, Catoctin Coalition, Farm Bureau of Loudoun, Friends of the Blue Ridge Mountains, Goose Creek Association, Goose Creek Scenic River Advisory Committee, LCPCC Executive Committee, LCPCC Finance Cte, Leesburg Garden Club, Loudoun Climate Project, Loudoun County Equine Alliance, Loudoun Historic Village Alliance, Loudoun Preservation Society, Loudoun Rural Landfills, Loudoun Soil & Water, Loudoun Walking Club, Loudoun Wildlife Conservancy, Piedmont Environmental Council, Potomac Heritage Trail Association, Save Rural Loudoun, Sterling Foundation, Transition Area Alliance, Unison Preservation Society, Virginia Native Plant Society (Piedmont Chapter), and Virginia Piedmont Heritage Area Association

Section	COMMENTS TO DRAFT TEXT -- ZONING DISTRICT STANDARDS
Packet p. 13	<p>Packet P. 13 For general knowledge, why was the Final Development Plan (FDP) requirement removed?</p> <p>Table format for Dimensional Standards is excellent</p>
2.01.01-1	<p>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?</p>
2.01.01-2	<p>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.</p>
2.02.02.1	<p>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?</p>
2.02.02.2	<p>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?</p> <p>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>

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2.02.02.3	<p>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?</p> <p>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>
2.02.02.4	<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?</p> <p>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>
2.02.02.5	<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?</p> <p>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>
2.02.02.J	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?
2.02.03	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?
2.02.03-2	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.
2.02.03.B	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?"
2.02.04-1	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?
2.02.05-1	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'?
2.02.06-1	2.02.06-1 SUBURBAN INDUSTRIAL Dimensional Standards. Generally, why was the yard standard "Adjacent to Roads" changed from 35' to 30'?

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2.03.01	2.03.01 TRANSITION LARGE LOT. Purpose. Bullet #9 "Nieghborhood-3" misspelling.
2.03.01-1	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?
2.03.01.F.1.a	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?
2.03.02	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?
2.03.03.F.	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?
2.03.05-1	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?
2.04.01	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?
2.04.02	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?
2.04.03	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?

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2.07.01	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?
2.07.02, 03,	In general, are there no changes for Legacy Districts? If not, can you highlight (red-line text) any changes?