

# ZOC Comments

## 06/01/21 - 06/14/21

### Section Comments

ID	Section
#1522	3.02.03 Rural Use Table
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/13/2021	<b>VILLAGES</b> Sorry if this is a repeat. Any significant revision of the zoning with respect to rural villages should be an independent initiative with meetings with the respective communities. It should not be part of this general re-write.
#1523	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	2019 GP supports area plans for each village, which would likely need to be a subsequent planning effort to the ZO Rewrite. This would also accommodate more community engagement focused at the local level.
#1521	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/13/2021	<b>AGRICULTURE - LIMITED DISTILLERY</b> I thought that this was part of the rural zoning revisions that were to be rolled into this re-write. Certainly late in complying with state legislation.  (Isn't there a punch-list that managers/supervisors should be checking?
#1570	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	"Limited distillery" has been rolled into the "Craft beverage manufacturing" use definition. We will evaluate whether this needs to be separated out as it's own agricultural-based use. Thank you for pointing this out.
#1520	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/13/2021	<b>AGRICULTURE - PET FARM</b> There should be some measure of intensity or scale here. Don't want everybody breeding a pet, or a couple pets, falling into this category.  I advocate excluding incidental and unregulated uses right from the definition, rather than broadly defining the use, and then exempting minor uses from regulation. Get them out of the regulatory picture from the get-go.
#1571	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	Suggest excluding the breeding of a set number of domestic pets from the definition.

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#1519	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/13/2021	AGRICULTURE - FEEDLOT There should be some measure of intensity or scale here. It should not be a feedlot for a couple 4-h'ers to fatten up their couple steers.
#1575	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	We could tie this to the definition of "animal units" (AU) in 9VAC25-32-10 and AU thresholds in 9VAC25-32-250/9VAC25-192-20/9VAC25-192-70 and activities subject to the Virginia Pollution Abatement (VPA) permit or VPDES program. However, those thresholds are larger than may be appropriate near residential neighborhoods. Will research this further.
#1518	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/13/2021	AGRICULTURE - CUSTOM OPERATORS Custom operation does not seem like a use. They are just farmers contracting to farm an agricultural property. A Who, not a what.
#1576	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	"Custom operators" is carried forward from the current ZO. Defined as "An establishment in which a contractor or other operator agrees to perform all or some machine operations, providing equipment and labor, for production and related activities on agricultural sites in exchange for a payment or a payment along with a percentage of profits. Field operations performed by a custom operator may include field preparation, planting, cultivating, harvesting, tilling, haymaking, bush hogging, crop storage, hauling, fencing, and barn construction."
#1517	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/13/2021	PERSONAL/BUSINESS SERVICES Why aren't the broad definitions of personal and business services sufficient?
#1577	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	Personal services defined as "Establishments primarily engaged in providing services, including the care of persons or their apparel." This is broad.  Business support services defined as "Establishments primarily engaged in rendering services on a fee or contract basis to the business, commercial, industrial, or institutional community." Important distinction here is "contract-based" and "business support."
#1516	3.03 Use Classifications, Categories, and Types

By: Eric Zicht zicht@erols.com Date:6/13/2021	DRY CLEANING PLANT Seems more industrial/manufacturing than personal/business services
#1578	3.03 Use Classifications, Categories, and Types
By: Mark White mwhite@planningandlaw.com Date:6/14/2021	It's here because NAICS classifies it under "812 Personal and Laundry Services." But it probably has characteristics that are more industrial in nature than the other uses in this category. Will consider recategorizing.
#1515	3.03 Use Classifications, Categories, and Types
By: Eric Zicht zicht@erols.com Date:6/13/2021	FARM MACHINERY Should this be under professional and business services? Seems to be the wrong category
#1579	3.03 Use Classifications, Categories, and Types
By: Mark White mwhite@planningandlaw.com Date:6/14/2021	Farm machinery is currently listed under "Personal / Business services." There is not a "professional and business services" category. There is an "Office, Business and Professional" category but that does not seem appropriate for Farm machinery.
#1514	3.03 Use Classifications, Categories, and Types
By: Eric Zicht zicht@erols.com Date:6/13/2021	SNACK OR BEVERAGE BAR Boy is this sinking into details! I thought one intent was to simplify matters.  I typically think of snack and beverage bars (usually they are both, not one or the other) as accessory uses in bowling alleys and the like.
#1580	3.03 Use Classifications, Categories, and Types
By: Mark White mwhite@planningandlaw.com Date:6/14/2021	The industry category for snack and beverage bars includes things like coffeehouses and teahouses, which are currently separate categories. Open for discussion moving forward.
<b>Needs Followup</b>	
#1513	3.03 Use Classifications, Categories, and Types
By: Eric Zicht zicht@erols.com Date:6/13/2021	RESTAURANTS Recommend diagram showing different types of restaurants. Many overlap.
#1581	3.03 Use Classifications, Categories, and Types
By: Mark White mwhite@planningandlaw.com Date:6/14/2021	Good point. This lends itself to a graphic or table. We will develop as we move forward.

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#1512	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/13/2021	<b>FOOD PREPARATION</b> How is food production different from other forms of manufacturing? How is it differentiated from those with "industrial character"? Are wineries and breweries "food production"? Won't carry-outs fall under the definition provided?
#1582	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	There is a difference between a storefront bakery and large-scale industrial facility with truck loading and similar operations. Wineries and breweries produce "food" also in the sense that they are classified as agricultural, but they are separately listed uses to address state statutory requirements and rural economy uses.
#1511	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/13/2021	<b>FARM MARKET (on-site)</b> Use parallel construction for the two forms of farm markets
#1583	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	There are already two farm market uses - one that requires 25% products grown on site and one that only requires 25% products grown in Loudoun.
#1510	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/13/2021	<b>VEHICLE REPAIR - LIGHT &amp; HEAVY</b> Do we need to differentiate these uses? There can be more problems with a high-traffic minor repair facility than a gas station that sometimes (rarely) replaces an engine or transmission.
#1584	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	These are common distinctions between repair uses due to the intensity of the use. "Vehicle repair, light" focuses on sale, servicing, repair and/or installation of motor vehicle accessories, which is generally less intensive than "Vehicle repair, heavy", which is major mechanical and body work.
#1509	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/13/2021	Where is co-housing defined (and permitted)? It is in the current ordinance, and there is nothing in the Comp Plan to indicate the use is to be eliminated. There is at least one application under consideration, and that applicant deserves notice.

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#1585	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	Our direction was to delete co-housing from the list because it relates more to the form of ownership/operational issues than a difference in the use. We will certainly loop in County Attorney's office and definitely provide adequate notice.
#1379	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/1/2021	RESIDENTIAL DWELLINGS ON VERY LARGE PARCELS Particularly on some of the very large estates in western Loudoun, some of the "accessory dwellings are very large. Should size limitations be applied to these? Also, in the past multiple principal dwellings were permitted on a per area basis, say in ARS a limit of one per 40 acres - so the property does not have to be subdivided. Also addresses some existing non-conformities.
#1387	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/1/2021	Yes - size limits are common to accessory dwelling regulations. The supplemental regulations can also regulate density. Most accessory dwelling regulations are written in more urban or suburban contexts, but we can also consider a density threshold. These would occur in sec. 3.06.
#1378	3.03 Use Classifications, Categories, and Types
By: Eric Zicht <a href="mailto:zicht@erols.com">zicht@erols.com</a> Date:6/1/2021	HISTORIC STRUCTURES - Where will the regulations pertaining to more permissive use of historic structures be included? For example, do the same requirements pertain to historic structures when used for B&B's or guest houses apply?
#1388	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/1/2021	The would be addressed in regulations for adaptive reuse of existing structures, and the historic district overlays.
#1377	3.03 Use Classifications, Categories, and Types

<p>By: Eric Zicht  <a href="mailto:zicht@erols.com">zicht@erols.com</a>          Date:6/1/2021</p>	<p>TABLE 3.03-1 DEFINITIONS:          Guest House -          why should a guest house be for temporary use? What if a family member or friend wanted/needed to live in the guest house? If it's non-paying, why does the County require it to be temporary? What's the County's interest in evicting a non-paying guest? (Sorry to get on a soap box, but my husband and I have a family member who we provide housing to, at no charge -- the house is in North Carolina, but the principle is the same.)</p> <p>For that matter, does the County have legal authority to require a "guest house" to lodge only temporary guests? Or to insist that the guests be non-paying? (There are VA statutes that define "family" or "household member" to include any type of familial relationship, by blood or by marriage or simply by cohabiting, and that do not require the family or household to reside together in the same house. And Virginia has defined "single family residence" to include up to two roomers or boarders, as well as persons related by blood or marriage or cohabitation.)</p> <p>If a roommate or boarder can live with you, and you split the mortgage and other expenses (and I know an awful lot of people who do that, including my next-door neighbors), then how can the County bar that arrangement for a house/guest house?</p> <p>The County should actually encourage long-term guest house occupancy, paying or not. It would help address the need for low and moderate income housing, and reduce traffic and noise complaints related to short-term guests.</p>
<p>#1389</p>	<p>3.03 Use Classifications, Categories, and Types</p>
<p>By: Mark White  <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a>          Date:6/1/2021</p>	<p>The purpose of the definitions section is to define what something is, rather than to regulate. However, I understand the concerns and the comment raises some interesting points about the administrative feasibility and enforceability of applying this. Per ZOC, "Guest House" has been collapsed into "Accessory Dwelling."</p>

## Section Comments

ID	Section
#1640	3.02.03 Rural Use Table
By: Gem Bingol <a href="mailto:gbingol@pecva.org">gbingol@pecva.org</a> Date:6/14/2021	Recreation, indoor: These facilities should not be included in the VC or VAR zoning districts, due to intensity of impact on a tightly clustered community and groundwater impacts of a use that brings large numbers of people to the facility.
#1650	3.02.03 Rural Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	"Recreation, indoor" is currently a SPEX use in RC and A-3 zoning that applies to villages. GP Rural Historic Village place type envisions "civic, cultural and community" uses as complementary. However, stricter use standards will be considered for villages given the historic and sensitive nature of resources.
<b>Needs Followup</b>	
#1639	3.03 Use Classifications, Categories, and Types
By: Gem Bingol <a href="mailto:gbingol@pecva.org">gbingol@pecva.org</a> Date:6/14/2021	Don't we still need a definition for "farm"?
#1651	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	We have "agriculture" as a defined use, but further analysis is needed on whether to break out "farm" as its own use. Especially given community input. Thanks for noting this concern.
<b>Needs Followup</b>	
#1638	3.03 Use Classifications, Categories, and Types
By: Gem Bingol <a href="mailto:gbingol@pecva.org">gbingol@pecva.org</a> Date:6/14/2021	Small business, agricultural and rural: In the contractors and contracting category, is there a need to further qualify what delineates a small contractor related to equipment/trucks stored/parked onsite?
#1652	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Yes, we can look at existing ZO Section 5-614 again to make sure there are clear regs for what can be done with vehicle storage.
<b>Needs Followup</b>	
#1637	3.03 Use Classifications, Categories, and Types

By: Gem Bingol <a href="mailto:gbingol@pecva.org">gbingol@pecva.org</a> Date:6/14/2021	Restaurant, sit-down versus fast food: Fast casual dining blurs the lines. Should fast casual be added to description of fast food (i.e. Panera, Cafesano, etc)? The seating is ample and decor more welcoming for customers to take their time, but are expected/encouraged to clear their tables.
#1653	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Good point. We will expand the definitions of fast-food restaurant.
#1636	3.03 Use Classifications, Categories, and Types
By: Gem Bingol <a href="mailto:gbingol@pecva.org">gbingol@pecva.org</a> Date:6/14/2021	Banquet/Event Facility: The last sentence seems to imply that there are some Banquet/Event facilities where adult entertainment is permitted, unless it's edited--i.e. "This use does not included adult entertainment WHICH IS not permitted..."
#1654	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Fixed.
#1635	3.03 Use Classifications, Categories, and Types
By: Gem Bingol <a href="mailto:gbingol@pecva.org">gbingol@pecva.org</a> Date:6/14/2021	Vehicle repair, light: The description is oriented to gas-powered vehicles. Should battery, natural gas or other fuel-powered vehicle needs be included?
#1655	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Yes. Fixed.
#1629	3.03 Use Classifications, Categories, and Types
By: Gem Bingol <a href="mailto:gbingol@pecva.org">gbingol@pecva.org</a> Date:6/14/2021	Kennel: Is there a specific reason why "over the age of 6 months" is included? Are kennels not allowed to accept animals under that age?
#1656	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	I believe this has to do with the distinction between animal breeders and animal boarders, but staff will need to some further research.
#1615	3.03 Use Classifications, Categories, and Types



By: Gem Bingol <a href="mailto:gbingol@pecva.org">gbingol@pecva.org</a> Date:6/14/2021	Country Inn: With the separate units, does there need to be some mention of limited duration stays to avoid small separate units turning into long-term residential rentals?
#1657	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Will consider as we refine use specific standards in Section 3.06.
#1612	3.03 Use Classifications, Categories, and Types
By: Gem Bingol <a href="mailto:gbingol@pecva.org">gbingol@pecva.org</a> Date:6/14/2021	Manufacturing, General Should this include mention of 3-D printing facilities? Also, where would "Makerspaces" also sometimes known as "hackerspace" fit? Based on equipment needed, currently it seems they don't need any special facilities, or pose any harm by being in an office, warehouse or other low-impact location. Currently the libraries offer makerspaces.
#1659	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Will add "3D printing" to manufacturing general. Agreed that "Makerspace" is a good one to differentiate as they are generally low impact.
<b>Needs Followup</b>	
#1611	3.03 Use Classifications, Categories, and Types
By: Gem Bingol <a href="mailto:gbingol@pecva.org">gbingol@pecva.org</a> Date:6/14/2021	Thinking of a recent rezoning where the case was being made to double count required open space as required civic space, is there a need here to clarify that both are required?
#1658	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	I recall that legislative application as well. Please hold on to this comment as we will get into Open Space requirements in the Development Standards section at a later date.

## Section Comments

ID	Section
#1574	3.02.01 Urban and Suburban Use Table
By: Jean Ault <a href="mailto:jean.ault@gmail.com">jean.ault@gmail.com</a> Date:6/14/2021	Instead of Death Care Services, could we say "End-of-Life Services?"
#1660	3.02.01 Urban and Suburban Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	"End of Life Care" actually implies the last remaining days/months before a person dies. This term is used in health care and by organizations like the American Cancer Society. We can keep thinking about a better term for the use category.
<b>Needs Followup</b>	
#1573	3.02.01 Urban and Suburban Use Table
By: Jean Ault <a href="mailto:jean.ault@gmail.com">jean.ault@gmail.com</a> Date:6/14/2021	I believe that this was mentioned before, but Zoning district headings should remain fixed when scrolling. Also, zoning district abbreviations should be defined when scrolled over.
#1661	3.02.01 Urban and Suburban Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	This is a limitation of the enCodePlus system. Staff was told that table headings would remain fixed in the front-end once published. We will follow up.
<b>Needs Followup</b>	
#1572	3.02.01 Urban and Suburban Use Table
By: Jean Ault <a href="mailto:jean.ault@gmail.com">jean.ault@gmail.com</a> Date:6/14/2021	We took out Group Home, so now is it covered only under Congregate Housing? Permitted only by SPEX? Aren't they permitted by right in neighborhoods?
#1662	3.02.01 Urban and Suburban Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	<p>A quick search of the Revised 93 ZO doesn't show the term "group home." Perhaps you are referring to "Group Living," which is a use category in the Revised 93 ZO and newly proposed use tables. This category includes congregate housing (which includes orphanages), continuing care facilities, and rooming and boarding. Religious housing and tenant dwelling have been recategorized from Group Living to Household Living.</p> <p>This spectrum of Group Living/Household Living uses varies from Permitted to SPEX depending on the use and zoning district.</p>

## Section Comments

ID	Section
#1415	3.02.03 Rural Use Table
By: Jeff Browning <a href="mailto:jeff@browningequipment.com">jeff@browningequipment.com</a> Date:6/1/2021	I see that Rural North and Rural South initials have been changed to ARN and ARS. I hope this is to include the word Agriculture. This word is important because it comes with certain regulatory protections. Let's keep it. Thank you.
#1535	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	Yes. The "A" stands for Agricultural, to represent the importance of agriculture in defining the character and community in those rural districts.

## Section Comments

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<b>Needs Followup</b>	
#1483	3.03 Use Classifications, Categories, and Types
By: Joe Paciulli <a href="mailto:joepaciullizoc@gmail.com">joepaciullizoc@gmail.com</a> Date:6/9/2021	The definitions of the uses overall are very broad and subject to many interpretations. I can say that from A-Z. Specifically, for example, the Utility Minor and Utility Major look to fill 2 pages in length. I believe they prohibit or require special exception to build any of the public utilities in the county. Power lines, stormwater management, water or sewer systems, neighborhood water pressure station, sewer pump station, etc. – all permitted now would require special exception or are not permitted. The typical Loudoun Water system in eastern Loudoun is impacted. This falls back to my concern over the quality of the definitions. They “explain” the subject very well. Very broad. Very informative. But in the context of a legal definition in an Ordinance they are too broad and general when you then slap an S or a P on them.
#1589	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	Noted for discussion.
#1482	3.02.01 Urban and Suburban Use Table
By: Joe Paciulli <a href="mailto:joepaciullizoc@gmail.com">joepaciullizoc@gmail.com</a> Date:6/9/2021	I'd think any urban area that allows housing or work should allow some form P or S of Animal related services. How do you have "live, work, play" if you have to drive to the suburbs to get your cat care?
#1487	3.02.01 Urban and Suburban Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/11/2021	"Animal Hospital" is now included in Urban Mixed Use and Urban Employment district. It is defined as "a place for the medical care of animals." "Veterinary service" is actually defined as "care for animals on an off-site" basis. We will consider adding that use in to Urban districts as well.
#1481	3.02.01 Urban and Suburban Use Table
By: Joe Paciulli <a href="mailto:joepaciullizoc@gmail.com">joepaciullizoc@gmail.com</a> Date:6/9/2021	A Live Work Dwelling should be allowed in the UT district.
#1488	3.02.01 Urban and Suburban Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/11/2021	Added.

ID	Section
#1480	3.03 Use Classifications, Categories, and Types
By: Joe Paciulli <a href="mailto:joepaciullizoc@gmail.com">joepaciullizoc@gmail.com</a> Date:6/9/2021	I continue to have concerns that the definition of uses is housed in this section, and ultimately again in a definitions section of the Ordinance. Having it in both is confusing, but also lends it self to typo errors and inadvertently creating two separate definitions of the same thing. Also, the use definitions are very long at times and go into "common speak" explaining what the use is or intended. The true definitions need to be housed in one area of "definitions" which are exact (brief), clear, consistent and legally understandable.
#1590	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	I agree that we should define the uses in one place. The use definitions will be placed here and not in Chapter 10.

## Section Comments

ID	Section
#1642	3.02.01 Urban and Suburban Use Table
By: John Merrithew Date:6/15/2021	Are we distinguishing between A-3 suburban and A-3 rural? Don't believe rural resort should be permitted in AS-3 suburban.
#1663	3.02.01 Urban and Suburban Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Yes. We are thinking that A-3 Rural becomes "Rural Agricultural/Residential." A-3 Suburban is a limited constrained area along the Potomac River that we plan to leave alone as a legacy district. "Rural resort" is currently allowed by SPEX in A-3.
#1641	3.02.01 Urban and Suburban Use Table
By: John Merrithew Date:6/15/2021	Single family detached is a conditional use in urban mixed use. How is it made conditional in the UM zoning district?
#1664	3.02.01 Urban and Suburban Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Updated so that "Dwelling, single-family detached" is now by SPEX in UM district.
<b>Needs Followup</b>	
#1376	3.02.01 Urban and Suburban Use Table
By: John Merrithew Date:6/1/2021	Where is heavy equipment repair?
#1500	3.02.01 Urban and Suburban Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	That seems like a gap - the closest use is "vehicle repair, heavy." We will consider folding "heavy equipment repair" into the heavy vehicle repair category and rename that "heavy equipment repair" (which would include vehicles). Thanks for pointing this out.
<b>Needs Followup</b>	
#1375	3.02.02 Transition and JLMA Use Table
By: John Merrithew Date:6/1/2021	Food Beverage - combine restaurants as a single use and separate drive-through facilities. All restaurants should be allowed to offer sit down, take out and delivery services; whether it is fast food or not. The issue is drive-through.
#1505	3.02.02 Transition and JLMA Use Table

By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	Restaurant uses need more work. There have been multiple ZOC members that have raised questions.
#1374	3.02.03 Rural Use Table
By: John. Merrithew Date:6/1/2021	What is a testing facility? Could not find a definition.
#1537	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	I do not see any reference to a "testing facility." There is, however, a "testing station," which is defined in 3.03 and carries forward the current definition ("Testing Station: Land and/or structures for the purpose of testing electromagnetic waves utilized for radios, television, microwave, radar, and other means of communication. This use shall not include testing operations for light, X-ray, radioactive emissions, or any other emissions dangerous to human health.").
#1373	3.02.03 Rural Use Table
By: John Merrithew Date:6/1/2021	Communications - making these facilities legislative applications is contrary to goals of expanding internet connectivity. The legisl,active applications will deter expansion and historically the conditions of approval have been a consistent series of performance measures that could be applied to permitted uses.
#1539	3.02.03 Rural Use Table
By: James David Date:6/13/2021	The Board is working on adopting legislation to remove the SPEX fee for wireless telecommunications facilities in coverage gap areas. This will help reduce barriers. As a next step, we will evaluate where we can remove the legislative process all together. Note that "Telecommunications Facility" does have P/S, which means that they are permitted by right provided certain criteria are met.
<b>Needs Followup</b>	
#1372	3.02.03 Rural Use Table
By: John Merrithew Date:6/1/2021	<p>If the County policy is to support the rural economy, then I don't think this use list accomplishes that goal. The use list seems to acknowledge the rural area is to be a residential enclave.</p> <p>I believe tenant housing can be important in the rural area and should be a permitted use.</p> <p>I thought the concept for rural businesses was to make them permitted and subject to performance standards. It appears now the vast majority of business uses will require a SPEX or minor SPEX. It could be as simple as permitted on paved roads and SPEX elsewhere or permitted when more than xxx feet from a residence.</p> <p>Water extraction should not be permitted anywhere in the County. Farm Coops are no it a use. They are a type of ownership.</p>

ID	Section
#1540	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	Noted for discussion. Water extraction is removed. "Farm co-op" is carried over, and includes a "central market place where farmers can deliver products for pick-up by consumers." This seems to be more than just a form of ownership.



## Section Comments

ID	Section
#1504	3.03 Use Classifications, Categories, and Types
By: Kevin Ruedisueli <a href="mailto:kevinruedisueliZOC@gmail.com">kevinruedisueliZOC@gmail.com</a> Date:6/13/2021	Revise definition of Wood, Metal, and Stone Crafts to accommodate different scales of these activities, and therefore allow them in more districts.
#1586	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	Noted - will work on different scales of Wood, Metal, and Stone Crafts.
#1503	3.02.03 Rural Use Table
By: Kevin Ruedisueli <a href="mailto:kevinruedisueliZOC@gmail.com">kevinruedisueliZOC@gmail.com</a> Date:6/13/2021	Relative to Farm Markets (both on and off-site), is it not possible that a farm could abut village and therefore a market could be in a village while the adjacent farms was not? Suggest adding Farm Market back to VR & VC. Or, 'bin' this for future discussion and recommendation for CPAM & ZOAM.
#1524	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	Farm markets appear to make sense for this kind of environment, unless there is limited land area and it would disrupt a street wall (in which case we could consider an A and B street approach, with farm markets on B streets). I wonder this is true for some of village zoning but not others.
#1502	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli <a href="mailto:kevinruedisueliZOC@gmail.com">kevinruedisueliZOC@gmail.com</a> Date:6/13/2021	wood, metal and stone crafts are not always heavy-duty manufacturing sorts of businesses and are valuable to the rural portions of the county as well as the rest of the county. Small metal shops can serve farms, as can woodworking shops. If the GP needs to be amended to add these two uses to other parts of the county, this should be added to a 'bin' for discussion of recommended CPAM & ZOAM items.
#1665	3.02.01 Urban and Suburban Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	See previous reply from Mark White
<b>Needs Followup</b>	
#1501	3.03 Use Classifications, Categories, and Types

By: Kevin Ruedisueli <a href="mailto:kevinruedisueliZOC@gmail.com">kevinruedisueliZOC@gmail.com</a> Date:6/13/2021	There are two definitions listed under the sub heading of Manufacturing and employment which might be better placed elsewhere--Media Production & Research & Development. These two uses are often found in proximity to educational institutions as well as transit stations in other vibrant locals. They also may fit well with other office uses and are compatible with multifamily housing. They could work well in the UT district, contrary to plan language. ZOC may wish to recommend a CPAM and ZOAM to adjust this once we have gotten through the ZOR. ZOC should have a 'bin' for such items.
#1587	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	Noted for future discussion.

## Section Comments

ID	Section
#1634	3.03 Use Classifications, Categories, and Types
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	SEE ADDITIONAL COMMENTS posted in Section 3.01, Explanation of Use Table Structure
#1633	3.03 Use Classifications, Categories, and Types
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	Table 3.03-1 Definitions. What is or will be the definition of "FARM?"
#1666	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	We have "agriculture" as a defined use, but further analysis is needed on whether to break out "farm" as its own use. Especially given community input. Thanks for noting this concern.
#1632	3.03 Use Classifications, Categories, and Types
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	Table 3.03-1 Definitions. BREWERY, LIMITED. The move of this use in all Policy Areas to be removed from Food and Beverage Sales/Service to Agriculture makes much more sense and made it in line with the Code of Virginia requirements.
#1667	3.03 Use Classifications, Categories, and Types
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Agreed.
#1631	3.03 Use Classifications, Categories, and Types
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	Table 3.03-1 Definitions. CULTURAL TOURISM. Still have the typo "natual" instead of "natural"
#1668	3.03 Use Classifications, Categories, and Types

By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Fixed
#1630	3.02.03 Rural Use Table
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	SEE ADDITIONAL COMMENTS posted in Section 3.01, Explanation of Use Table Structure
#1628	3.02.03 Rural Use Table
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	Table 3.02.03-3 BREWERY, LIMITED. The designation of Special Exception in Rural Commercial (RC) districts is appropriate and should be considered also for VAR (A-3) due to likely small parcels and lack of actual agricultural crop or livestock to comply with the Code of VA requirement being on a "farm in the Commonwealth of Virginia." This designation also confirms the County's updated understanding of the ability to define the performance standards for the health, safety and welfare of the public and patrons. The move of this use in all Policy Areas to be removed from Food and Beverage Sales/Service to Agriculture makes much more sense and made it in line with the Code of Virginia requirements.
#1669	3.02.03 Rural Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Will consider amending the permissibility of "Brewery, Limited" to SPEX in VAR.
#1627	3.02.03 Rural Use Table
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	Table 3.02.03-3. BED & BREAKFAST INN / COUNTRY INN. I agree with Mr. Houston's concept of better defining the requirements for one structure versus multiple structures, and assigning the Permitted vs. SPEX accordingly. The applications with multiple structures cannot be evaluated the same traffic, setback, event, noise, and overall intensity impacts in the same manner, and therefore should not be permitted by-right or have the exact same performance standards. The inclusion of "rooms for meetings and private parties" and "full-service restaurant" indicates larger scale applications should have CONSISTENT evaluation as event centers to avoid using this "Use" to circumvent the Event Center use.
#1670	3.02.03 Rural Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Will consider as we update Use Specific Standards in Section 3.06.
#1626	3.02.03 Rural Use Table

By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	Table 3.02.03-3. MARINA still listed?? Should it be removed or is it (still) pending review?
#1671	3.02.03 Rural Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	"Marina" is allowed in A-3 currently. Will reconsider as we further refine the VAR and RAR zoning district. Thanks for noting.
<b>Needs Followup</b>	
#1625	3.02.03 Rural Use Table
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	Table 3.02.03-3-RPA. CRAFT BEVERAGE MANUFACTURING -- Removed in all place types? What is the planned alternative?
#1672	3.02.03 Rural Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Staff is still working on this one. "Craft Beverage Manufacturing" has been historically viewed as a Light Production use, which is why it was no longer proposed in mixed-use and other districts not envisioned for that intensity. A smaller scale use permitting the manufacture of alcoholic beverages is being considered that would be more appropriate than a light production use in the districts where "Craft Beverage Manufacturing" was formerly proposed.
#1624	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	SEE ADDITIONAL COMMENTS posted in Section 3.01, Explanation of Use Table Structure
<b>Needs Followup</b>	
#1623	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	Table 3.02.02-2. DWELLING, SINGLE-FAMILY ATTACHED. With the parallel emphasis on the Unmet Housing Strategic Plan, why are there so few place types that allow this use? If applied appropriately (size, location, setbacks, etc.), and interspersed -- duplexes or other attached housing that blends into an area could provided some additional housing.
#1673	3.02.02 Transition and JLMA Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Agreed. Now that the UHNSP is almost complete, we need to take another look at allowing more SFA attached and MF housing in zoning districts.

#1622	3.02.01 Urban and Suburban Use Table
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	SEE ADDITIONAL COMMENTS posted in Section 3.01, Explanation of Use Table Structure
#1621	3.02.01 Urban and Suburban Use Table
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	Table 3.02.01-1. Urban/Suburban Use Table. Why was SAR changed back to A-3? Need to remove SAR from the footnote description on the bottom of this table.
#1674	3.02.01 Urban and Suburban Use Table
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	A-3 is found in RPA and SPA. A-3 in RPA becomes "Rural Agricultural/Residential." The initial concept was to make a companion "Suburban Agricultural/Residential" or SAR for the A-3 in the SPA. After further reflection on the GP place types, ag uses are not envisioned in the SPA. Furthermore, A-3 Suburban is a limited constrained area along the Potomac River. The current thinking is to leave the A-3 in the SPA alone as a legacy district.
#1620	3.01 Explanation of Use Table Structure
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	ATTACHMENT 3 DOCUMENT IN 6/16/21 PACKET. RURAL VILLAGE USES -- As representative for Loudoun Historic Village Alliance I will reserve comment after review with LHVA as there was insufficient time before the Monday noon deadline.
#1675	3.01 Explanation of Use Table Structure
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Understood. Hopefully you didn't work too hard on Sunday - Happy belated birthday!
<b>Needs Followup</b>	
#1619	3.01 Explanation of Use Table Structure
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	ATTACHMENT 3 DOCUMENT IN 6/16/21 PACKET. Why are the following NOT ALLOWED? -- Wood, Metal, ant Stone Crafts in RC? I agree with Kevin R. that this use may need to be separated for low vs. higher intensity in some manner.
#1676	3.01 Explanation of Use Table Structure

By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Will keep working on it per response to Kevin.
<b>Needs Followup</b>	
#1618	3.01 Explanation of Use Table Structure
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	ATTACHMENT 3 DOCUMENT IN 6/16/21 PACKET. Why are the following NOT ALLOWED? -- Auction in ARN, ARS, RAR -- they happen on occasion for antiques, estates. -- Personal Instructional Services, Clinic, Dental or Medical in RC?
#1677	3.01 Explanation of Use Table Structure
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Uses were modified based on 2019 GP Place Type analysis. We will take another look at the ones identified here.
#1617	3.01 Explanation of Use Table Structure
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	ATTACHMENT 3 DOCUMENT IN 6/16/21 PACKET. The References between 1.f and 2.f appear to be messed up?
#1678	3.01 Explanation of Use Table Structure
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Will fix
#1616	3.01 Explanation of Use Table Structure
By: Maura Walsh-Copeland <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a> Date:6/14/2021	ATTACHMENT 3 DOCUMENT IN 6/16/21 PACKET. RURAL 1.m. RAR (A-3). Why allow AGRITAINMENT, AMPHITHEATHER, CULTURAL TOURISM in RAR and RC? Would require performance standards to manage traffic and residential impacts.
#1679	3.01 Explanation of Use Table Structure
By: James David <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a> Date:6/15/2021	Based on staff's analysis these uses are envisioned in the RPA. Will consider performance standards in Section 3.06.
#1614	3.01 Explanation of Use Table Structure

<p>By: Maura Walsh-Copeland  <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a>          Date:6/14/2021</p>	<p>ATTACHMENT 3 DOCUMENT IN 6/16/21 PACKET: These 24 pages of explanation were VERY helpful, as was the redline version of changes made since 6/2/21. Honestly, reviewing the tables for the third time with multiple changes each time has made it more difficult to keep track of the justifications. (Having two large monitors to compare before and after helps, but this Attachment explanation is actually more useful than the track changes for viewing and discussion).</p>
<p>#1680</p>	<p>3.01 Explanation of Use Table Structure</p>
<p>By: James David  <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a>          Date:6/15/2021</p>	<p>The Use Tables section is very detailed and we understand it is a monumental task to review. The first draft was bringing all the uses together into one table (very time consuming), the second draft was making sure use tables were consistent with how things are treated now, and the last version reflects proposed changes to implement of the new 2019 GP.</p>
<p>#1613</p>	<p>3.01 Explanation of Use Table Structure</p>
<p>By: Maura Walsh-Copeland  <a href="mailto:Maura@Walsh-CopelandConsulting.com">Maura@Walsh-CopelandConsulting.com</a>          Date:6/14/2021</p>	<p>JUNE 16 PACKET: Although having both the "clean" and "redline" copies in the packet is helpful, it requires a tremendous amount of time to review jumping up &amp; down, up &amp; down. To more quickly compare, would Staff considered changing the online enCodePlus ZOC view to the redline to better compare changes from meeting to meeting?</p>
<p>#1681</p>	<p>3.01 Explanation of Use Table Structure</p>
<p>By: James David  <a href="mailto:james.david@loudoun.gov">james.david@loudoun.gov</a>          Date:6/15/2021</p>	<p>We would prefer to distribute the "clean" and "redline" versions as separate attachments and keep enCode up to date with the latest and greatest clean version.</p>



## ZOC Comments 06/01/21 - 06/14/21

ID	Section
#1499	3.02.03 Rural Use Table
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	Brewery - No No No. There are too many of these now. They bring unsafe traffic conditions, noise and general nuisances. Allowing more of them would bother the majority of people in the RPA.
#1525	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	Code of Virginia 15.2-2288.3:1 classifies limited breweries as agricultural, requires zoning regulations for them to be "reasonable" and to consider the economic impact of zoning regulations on them, and prohibits regulation of a number of customary activities at limited breweries. Any regulation needs to consider those restrictions.
#1498	3.02.03 Rural Use Table
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	Agricultural cultural center - While this sounds interesting, my sense is that the County should be able to control things, so require a SPEX.
#1526	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	We can also address them with supplemental regulations in 3.06.
#1497	3.02.03 Rural Use Table
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	Rural Retreat - To avoid abuse, remove "P" and require SPEX.
#1527	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	Level of permissibility proposed aligns with 2019 GP. Open to discussion.
#1496	3.02.03 Rural Use Table
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	Snack or beverage bars. Why is this permitted? Do not permit them.
#1528	3.02.03 Rural Use Table

By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	These are equivalent to coffeehouses/tea houses, which are currently allowed in AR-1 and AR-2.
#1495	3.02.03 Rural Use Table
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	Banquet/event facility - This category HAS been abused and in some areas there are too many of them. Thus, control things by requiring a SPEX.
#1529	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	We are considering updates to the use specific standards for banquet/event facilities when we get to Section 3.06.
#1494	3.02.03 Rural Use Table
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	Rural resort - Must be SPEX, not M. This is yet another use that can be abused. Also, in the event these proliferate, then the Board can control matters through the SPEX process.
<b>Needs Followup</b>	
#1530	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	Noted for discussion. We can also address them with supplemental regulations in 3.06.
#1493	3.02.03 Rural Use Table
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	Country Inn - As with B&B Inn, limit this to one building. DO not allow multiple buildings. If you insist on allowing more than one building, then this use should be a P for a single building but a SPEX if more than one building.
#1531	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	We plan to address the triggers for SPEX in 3.06. Thanks for pointing this out.
#1492	3.02.03 Rural Use Table
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	Bed and Breakfast Inn - should be limited to ONE building. In the current ZO, this category included the plural 'buildings' and was quickly abused by someone who built a row of cabins on Route 9.
#1532	3.02.03 Rural Use Table

By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	This is something to consider for Use Standards in Section 3.06. Thanks for pointing this out.
#1491	3.02.03 Rural Use Table
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	Rural Resort should require a SPEX, not just an M. This category is also open to abuse, so every such application needs scrutiny and legislative approval. (Gable's landfill shows how use definitions can be abused.)
#1533	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	It seems that, whether this is classified as SPEX or not, the definition and maybe Section 3.06 need to clarify and distinguish this to keep that issue from reoccurring.
#1490	3.02.03 Rural Use Table
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	Require a SPEX for campgrounds. The standards may leave room for abuse.
#1534	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	We can also address them with supplemental regulations in Section 3.06.
#1489	3.03 Use Classifications, Categories, and Types
By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/12/2021	"Manufactured homes" should NOT be a permitted use, given the standards later in this document. The standards for Manufactured Homes would permit structures as small as 320 square feet...MOBILE HOMES. Bad, bad, bad.  I think what you want, and what would be acceptable, are "Modular Homes."
#1588	3.03 Use Classifications, Categories, and Types
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/14/2021	Manufactured homes are built to a federal, preemptive building code (the "HUD Code"), as opposed to "mobile homes" which predate the HUD Code. They are also more affordable than site-built homes, and others on the ZOC have expressed interest in accommodating them.
#1380	3.02.03 Rural Use Table

By: Charles Houston <a href="mailto:CharlesHouston3@yahoo.com">CharlesHouston3@yahoo.com</a> Date:6/1/2021	John Merrithew makes interesting comments but I think he is wrong about the "rural economy." This concept was introduced to enable landowners (farmers) supplement their income so they could retain their land and the county could retain its rural character. In practice, though, "rural economy" has become a concept that is allowing blatantly commercial uses to intrude on the RPA.
#1536	3.02.03 Rural Use Table
By: Mark White <a href="mailto:mwhite@planningandlaw.com">mwhite@planningandlaw.com</a> Date:6/13/2021	Noted.