



Waterford FOUNDATION, INC.

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June 27, 2022

Joe Kroboth, III, PE, Acting Director, Planning and Zoning
1 Harrison Street, SE 3rd Floor
Leesburg, VA 20175

Dear Mr. Kroboth

The Waterford Foundation would like to thank you and the Loudoun Zoning Staff for their help with the Zoning Ordinance Rewrite (ZOR). The Waterford Foundation has long advocated for amenable Adaptive Reuse zoning policies, and we are pleased to see that it is included in the new draft (Chapter 5, Section 10). Keeping old properties in use benefits all of us, the environment, and the property itself. Thank you.

The Waterford Foundation has a few additional comments on the Chapter on Adaptive Reuse, and our recommendations broadly fall under the following headings:

Purpose: We have included reference to widely recognized standards of adaptive reuse to encourage retention of character defining features of historic properties. We also see a natural overlap between re-use of the built environment and the sustainability movement:

On the fifth bullet point please include “Encourage preservation of historic structures through appropriate renovation, *such as the Secretary of Interior Standards and/or ruling by HDRC (see Section C Standards and Requirements.)*”

On the seventh bullet point please add “*Encourage sustainability,*” prolong building lifespans, encourage reuse of existing resources”

Eligibility / Section B We have broadened the scope of eligibility with the intention of allowing more older buildings to qualify, so as to encourage adaptive reuse of the built environment by keeping the process simple. We recommended streamlining the rezoning process to make the process more user-friendly and financially affordable by removing requirements such as market analysis, structural engineers, and verification of obsolescence. Adaptive reuse should not be expensive and burdensome.

Section B Please add ... “To be eligible for adaptive reuse, a structure must be *“one of the following: ...”*”

Section B.1 Please add line item “*B.1.e Designated ‘locally historic’ by the Loudoun County Heritage Commission.*”

Section B.3 Delete “... *and the prior use or uses in the structure are obsolete or economically nonviable.*”

Section B.3 Delete line items *a. through c.*

Standards and Requirements / Section C We recommended allowing more options when making changes as some historic buildings and sites don’t lend themselves to traditional zoning set-backs or rear, off-street parking spaces. When there are questions, we recommend the Zoning Administrator consult with the HDRC.

C In the first sentence, please include “as set forth... *in Sections 5.10.C and 5.10.D below, and must comply with the following design standards unless an alternative design is recommended by the HDRC upon submission of an application following the COA application standards and process. If the property is not located in an HCC overlay district, the HDRC shall be guided by the Secretary of Interior standards in making its recommendations.*”

Table 5.10-1 Uses Permitted as Adaptive Reuse We recommend allowing additional density except in cases with an absentee landlord.

In the second line of the table, under ‘Permitted as Adaptive Reuse,’ please see suggested definition of “*Live /Work*” in the Section, which covers ‘Definitions.’

Again, the Waterford Foundation greatly appreciates your patience and all of the work of Zoning staff with our additional recommendations listed above. The Zoning Rewrite is so important to all of us to ensure correct implementation of the 2019 Comprehensive Plan.

Yours truly,



Susan Manch
President, Waterford Foundation Board of Directors

Cc.: Mr. Caleb Kershner, Supervisor, Catoctin District
Cc.: Mr. Forest Hayes, Chairman, Planning Commission
Cc.: Mr. Mark Miller, Planning Commission, Catoctin District

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