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Date: Sat, Jul 16, 2022 at 10:21 AM  
Subject: Online Form Submittal: Zoning Ordinance Rewrite  
To: <[ewbsouthgate@gmail.com](mailto:ewbsouthgate@gmail.com)>

## Zoning Ordinance Rewrite

Areas of interest or concern

### Development Standards

What is your question or concern?

**Comments submitted for the  
Piedmont Chapter of the Virginia Native Plant Society by Emily  
Southgate, President**

### New Zoning Ordinance 5.06 Tree Planting, Replacement and Preservation

- to “encourage the preservation of existing trees to meet canopy requirements”
- to “Ensure that new development, redevelopment, and infill development incorporates existing native vegetation and plantings of native vegetation into the landscape design to the extent feasible.

**Recommendation:** The standards in 5.06.C and D do not prioritize the preservation of existing trees. They should provide for stronger protection of existing native trees, and incentives for their preservation. This would conform to the 2019 Comprehensive Plan.

**Explanation:** With the exception of the words I have highlighted, the introductory text conforms to the 2019 Comprehensive plan as quoted below:

2019 Comprehensive Plan, Forests, Trees and Vegetation  
FTV Policy 4

A. Require applicants to submit a Tree Cover Inventory as part of all development applications and, where applicable, require applicants to

submit a Tree Conservation Plan for designated Tree Conservation Areas; such Tree Conservation Plan should demonstrate a management strategy that ensures the long-term sustainability of these designated areas and address the removal and monitoring of invasive woody vegetation and insects.

B. Incentivize and encourage the preservation of existing trees within required landscape buffer areas and for screening of uses.

Natural Heritage Resources

NHR Policy 6

C. Ensure that new development, redevelopment, and infill development incorporates existing native vegetation and plantings of native vegetation into the landscape design.

However, the actual standards cited in the text in sections C and D do not prioritize the preservation of existing trees. The standards should provide for stronger protection of existing native trees, and incentives for their preservation. This would conform to the 2019 Comprehensive Plan.

### **5.03 Natural and Environmental Resources Protection Standards**

**Recommendation:** The existence of rare and endangered species and habitats should be noted in any development application (on a checklist, perhaps) and the potential for protection be assessed by the appropriate development officials.

**Explanation:** Rare and endangered species and habitat locations should be explicitly included for all areas of the county. In the current zoning ordinances, they are mentioned for steep slopes, etc., but nowhere else. I have been unable to find them anywhere in the new ordinances. The list of these, with locations, is available from the Virginia Department of Conservation and Recreation, Natural Heritage Office. Loudoun has several species and habitats that are highly endangered, that is, ranked S1.

Thank you for your participation!

