



**Loudoun County
Zoning Ordinance Committee**

**FINDINGS AND
RECOMMENDATIONS**

**On The Draft Loudoun County
Zoning Ordinance (April 18, 2022)**

Table of Contents

Zoning Ordinance Rewrite Background	3
Zoning Ordinance Committee	3
History and Structure	3
Membership	4
Subcommittees	5
Meeting Schedule	5
Consultant Research	7
Best Management Practices	7
Code Audit	7
EXECUTIVE SUMMARY.....	8
Findings and Recommendations.....	11
Overall Zoning Ordinance	11
Zoning Districts.....	13
Uses.....	15
Development Standards	17
Attainable Housing	20
Transitioning to the New Zoning Ordinance	22
Potential Future Zoning Ordinance Amendments	23
Appendix 1 ZOC Findings and Recommendations Matrix	
Appendix 2 ZOC Comments	

Zoning Ordinance Rewrite Background

The [Zoning Ordinance](#) is the primary implementation tool for the [2019 Comprehensive Plan](#), which the Board of Supervisors (Board) adopted on June 20, 2019. It contains an added level of specificity for how and where land development can happen that is based on the community's vision as expressed in the goals, policies, and actions of the 2019 Comprehensive Plan. The Zoning Ordinance therefore needs to be revised and/or replaced to maintain consistency between the County's visionary and regulatory planning documents. Moreover, while numerous amendments varying in scope and scale have been adopted to the existing Zoning Ordinance, there has not been a comprehensive evaluation and update of the ordinance since January 2003. As such, the rewrite project will include updating the content and structure of the Zoning Ordinance based on modern best practices in land use regulation.

As the local governing body, the Board will ultimately consider, revise, and adopt the proposed Zoning Ordinance text following recommendation by the Planning Commission. The process of formulating the proposed Zoning Ordinance has and continues to involve engagement of a wide variety of internal and external stakeholders. The Zoning Ordinance Committee played a critical role in supporting the Board, Planning Commission, and County staff.

Zoning Ordinance Committee

History and Structure

On October 6, 2020, the Board approved the formation of the [Zoning Ordinance Committee \(Committee\)](#), structure, and bylaws. The Committee is comprised of citizen-members representing a broad spectrum of countywide stakeholder organizations and professional areas of expertise potentially impacted by Zoning Ordinance changes. The Committee's purpose, as stated in the bylaws, is "supporting the Commission, the BOS, and Loudoun County staff by reviewing and recommending changes to the current Loudoun County Zoning Ordinance".

Recommendations may include, but are not limited to:

- Correcting errors and inconsistencies.
- Clarifying regulations.
- Simplifying the Zoning Ordinance to make it more user friendly.
- Keeping the Zoning Ordinance current to reflect changes in the state code, the market, economic, fiscal and land use conditions and the emergence of new uses.

- Addressing a specific issue.
- Identifying when proposed Zoning Ordinance amendments are inconsistent with the Comprehensive Plan and may require a Comprehensive Plan amendment.

From November 2020 to April 2022, the Committee served as a sounding board for County staff, reviewing and commenting on early draft zoning ordinance text. The Committee reviewed early draft language prepared by staff, discussed the draft text during Committee meetings, and provided written comments through an online platform called enCodePlus. Comments made by Committee members are provided as Appendix 2.

Membership

Stakeholder Organizations and Subject Matter Experts	
Planning Commission Representative	John Merrithew
Loudoun County Chamber of Commerce	Colleen Gillis
NAIOP	Ross Stevens William "Bill" Junda*
NVBIA	Matt Lawrence
DAAR	Rich Brittingham
Subject Matter Expert: Architect	Kevin Ruedisueli, Chair
Subject Matter Expert: Urban Land-use Planner	Jean Ault Russ Forno**
Coalition of Loudoun Towns (COLT)	Bridge Littleton
Farm Bureau	Tia Walbridge
Rural Economic Development Council	Jeff Browning
Homeowner/Condominium Association	Ben Keethler
Economic Development Advisory Commission	Joe Paciulli
Environmental Organization	Gem Bingol
Preservation/Conservation Organization	Maura Walsh-Copeland
At large	Michael Capretti, Vice Chair
At large	Charles Houston
At large	Packie Crown
At large	Eric Zicht
*William Junda replaced Ross Stevens. (His first meeting was 3/14/22).	
**Russ Forno replaced Jean Ault (His first meeting was 2/2/2022).	

Subcommittees

The Committee established four subcommittees to facilitate the review of draft language. The focus areas and assigned committee members were as follows:

Uses

1. Colleen Gillis
2. Charlie Houston
3. Russ Forno
4. John Merrithew
5. Maura Walsh-Copeland

Zoning Districts

1. Matt Lawrence
2. Bridge Littleton
3. Kevin Ruedisueli
4. Tia Walbridge
5. Eric Zicht

Development Standards

1. Gem Bingol
2. Rich Brittingham
3. Bill Junda
4. Ben Keethler
5. Joe Paciulli

Attainable Housing

1. Jeff Browning
2. Michael Capretti
3. Packie Crown
4. Colleen Gillis
5. Kevin Ruedisueli

Meeting Schedule

Committee Meetings	
Date	Topic
2020-11-12	Overview of the Zoning Ordinance Rewrite
2020-12-02	Summary of Input, Round 1
2021-01-06	Code Audit Overview
2021-02-03	Parking
2021-02-17	Best Management Practices (Planned Unit Developments and Zoning Incentives)
2021-03-03	Software Platform enCodePlus
2021-03-17	Programmatic Overview
2021-04-07	Code Audit
2021-04-21	Code Audit
2021-05-05	Use Tables
2021-06-02	Use Tables
2021-06-16	Use Tables
2021-07-07	Parking
2021-07-21	Parking
2021-08-25	Use Specific Standards
2021-09-08	Use Specific Standards

Committee Meetings	
Date	Topic
2021-09-15	Overlay Districts
2021-10-06	Overlay Districts
2021-11-03	Zoning Districts
2021-11-17	Zoning Districts
2021-12-15	Signs
2022-01-05	Development Standards
2022-01-19	Development Standards
2022-02-02	Attainable Housing
2022-02-16	Historic District Overlay
2022-03-14	Subcommittee Expectations and Outcomes
2022-05-18	Review Subcommittee Findings and Recommendations
2022-06-01	Review Subcommittee Findings and Recommendations
2022-06-15	Review Draft Findings and Recommendations Report
2022-06-27	Review Draft Findings and Recommendations Report
2022-07-06	Key Issues Polling
2022-07-20	Final Findings and Recommendations Report Vote

Subcommittee Meetings	
Date	Topic
2022-04-05	Attainable Housing
2022-04-08	Attainable Housing
2022-04-21	Zoning Districts
2022-04-26	Zoning Districts
2022-04-25	Development Standards
2022-04-26	Development Standards
2022-04-26	Use Standards
2022-04-27	Use Standards

Meeting summaries and recordings are available online:
www.loudoun.gov/zoningordinancecommittee

Consultant Research

The Committee began its work on the Zoning Ordinance Rewrite project with briefings on a consultant's audit of the existing zoning ordinance and assessments of best management practices. Links to these consultant deliverables are provided below.

Best Management Practices

Kendig Keast Collaborative completed two Best Practices Assessments to inform the Zoning Ordinance Rewrite project:

- [Planned Unit Developments – Best Practices Assessment](#) (PDF)
- [Zoning Incentives – Best Practices Assessment](#) (PDF)

Code Audit

The code audit, completed by WSP, provided recommended updates to the Zoning Ordinance to improve usability, modernize regulations, and implement the Loudoun County 2019 General Plan.

- [Code Audit – Text Analysis](#) (PDF)
- [Code Audit – District Assessment and Recommendations](#) (PDF)

EXECUTIVE SUMMARY

The Findings and Recommendations of the Zoning Ordinance Committee (Committee) are a result of the pre-referral, early look process that spanned from November 2020 through February 2022, as well as work from each of the subcommittees between March and June 2022, which produced draft findings and recommendations for consideration by the committee-of-the-whole. The Findings and Recommendations in this report represent the majority positions of the committee based on either discussion during Committee meetings or MentiMeter votes taken at the July 6, 2022 Committee meeting. If a vote was taken on a specific finding/recommendation, those vote results are included in parenthesis after the Findings and Recommendations statement (Affirming, Dissenting, Abstaining, Absent).

Minority Findings and Recommendations from committee members discussed either in the subcommittees or the committee-of-the-whole are captured in the Findings and Recommendations Matrix (Appendix 1). Furthermore, each subcommittee section within the matrix includes a section titled: "Subcommittee did not flag the items below this row for further discussion by the full ZOC. However, a ZOC member may flag an item below for further discussion during the ZOC Committee of the Whole meetings." The items that fall below this title in each section are not in this report, as project staff either agreed with the subcommittee that the change was necessary, or additional research was necessary to make the appropriate change. If any of these items are not addressed in staff's draft Zoning Ordinance presented to the Planning Commission, then this Committee considers those to be unresolved issues that should be identified in the Staff Report to the Planning Commission.

The Findings and Recommendations in this report include discussions of the topics identified in the Findings and Recommendations Matrix (Appendix 1). Staff prepared the Matrix, identifying topics where additional discussion or input from subcommittees would be beneficial. Subcommittees used the Matrix a tool during subcommittee meetings to assist members in developing draft Findings and Recommendations for the ZOC committee-of-the-whole's consideration.

To develop draft Findings and Recommendations, subcommittees discussed each item listed on the Matrix and evaluated whether the draft text sufficiently implemented the 2019 GP. Subcommittees found that draft text 1) did not adequately address policies, goals, or strategies or implement the 2019 General Plan, 2) addressed policies, goals, or strategies in the 2019 GP, but implementation was incomplete, 3) addressed a policies, goals, or strategies in the 2019 GP, but implementation surpassed the intent of the 2019 GP, exceeding the necessary level of regulation.

Staff documented the subcommittees' suggested solutions in the Matrix. Solutions were intended to 1) align the draft text with the goals of the 2019 GP, 2) correct errors and inconsistencies, 3) clarify regulations, 4) simplify the Zoning Ordinance to make it more user friendly, 5) bring or keep the Zoning Ordinance current, or 6) address a specific issue. Subcommittees presented and discussed their Findings and Recommendations during two ZOC committee-of-the-whole meetings held in May and June 2022.

This Findings and Recommendations report must be considered in conjunction with the subcommittee matrices attached to this report (Appendix 1). The subcommittees considered many policy issues that were considered below the line and not voted on by the entire Zoning Ordinance Committee. These items deserve further consideration and deliberation by the Planning Commission and Board to consider an overall policy direction on these issues. Additionally, many of these items are flagged as issues not to be considered by the Committee but items that staff would "research and revise if needed". Since the Committee did not have the opportunity to review or discuss staff's consideration and revisions, an overall Committee position is not included at this time on these considered below the line. However, there are several specific topics outlined below the line that should be considered:

- 1) **Zoning Districts:** Line #8 – Block and street patterns. Looks at interconnectivity, grids, cul-de-sacs, curvilinear streets to preserve natural resources and topographic features. (Various Districts)
- 2) **Zoning Districts:** Line #12 – Lot sizes and coverage especially with regard to small lots in suburban and transition neighborhoods (Various Tables in Chapter 2)
- 3) **Use Standards:** Line #7 – A clearer/better definition of Agriculture is sought. (3.03.07)
- 4) **Development Standards:** Line #7 – Adaptive reuse of Non-Historic Structures is sought besides that of Historic Structures. (5.10, 9.01.C.5 and 5.04.04.A.1)
- 5) **Attainable Housing:** Line #7 – Concern about the 50% Occupancy Permit requirement in multi-family buildings when Occupancy Permits are not actually based upon finished units within the building. Occupancy Permit needs clarification in this situation. (8.01.I)
- 6) **Attainable Housing:** Line #20 – A concern about defining quality, limiting flexibility and increasing costs when the Ordinance stipulates similar or higher quality materials for AHU's. (8.01.K)

Two important items should be noted from this process. The Committee reviewed many chapters and sections of the staff draft new Zoning Ordinance. However, the Committee was not provided an opportunity to review all sections. These include the following key sections: Procedures, Legacy Districts, and the Suburban Mixed Use Overlay District. Secondly, the Committee was not provided the opportunity to review critical language dealing with potential map revisions, the creation of possible non-conforming uses, vesting, and the implementation of the new ordinance. Staff's analysis of the items could have a major impact on the Committee's position on the proposed Zoning Ordinance Rewrite. The Committee would appreciate the opportunity to review the updated ordinance and the sections that have not been prepared and provide feedback to the Planning Commission and Board.

Finally, the Committee remains engaged in the process and will be prepared to assist the Planning Commission or Board of Supervisors, as requested.

Findings and Recommendations

The Findings and Recommendations below represent the majority positions of the Committee based on either discussion during Committee meetings or MentiMeter votes taken at the July 6, 2022 Committee meeting. If a vote was taken on a specific finding/recommendation, those vote results are included in parenthesis after the Findings and Recommendations statement (Affirming, Dissenting, Abstaining, Absent). Findings and Recommendations that appear in blue font indicate these items did not receive a vote from the committee-of-the-whole. Instead, these items originated in a ZOC subcommittee and were presented to and discussed by the committee-of-the-whole during two meetings on May 18, 2022 and June 1, 2022.

Overall Zoning Ordinance

The Committee found that the draft Zoning Ordinance is too narrowly prescriptive. (9-8-1) Other comments that apply to the overall draft Zoning Ordinance follow.

1) Aligning the Zoning Ordinance with the 2019 General Plan

- a) The draft Zoning Ordinance references the 2019 General Plan (2019 GP) throughout the ordinance, requiring compliance with this policy document. These references should be removed. (12-6-0)
- b) The draft Zoning Ordinance should facilitate the goals of the 2019 GP without codifying the policy language. (8-3-6-1)
- c) Eliminate redundancy between the draft Zoning Ordinance and the 2019 GP and clarify the purpose of the two separate documents. Overarching goals and objectives are appropriate.
- d) Shift from policy language used in the 2019 GP to clear requirements in the draft Zoning Ordinance.
- e) Shift from ideal concepts, which are appropriate in the 2019 GP, to regulations in the draft Zoning Ordinance for real development situations.
- f) Purpose statements repeat policies from the 2019 GP. Revise Purpose statements and clearly indicate that they are not regulations or remove them from each section.

Findings and Recommendations that appear in blue font did not receive a formal vote from the ZOC and originated in a ZOC subcommittee.

2) Streamlining and User-Friendly

- a) Efforts to streamline and improve the usability of the draft Zoning Ordinance are not fully realized, and there are still many opportunities to improve.
- b) Continue working towards achieving a clearly written, easier-to-understand, user-friendly zoning ordinance.
- c) The draft is not clear enough and difficult for laypersons to understand.
- d) The links are helpful but there is too much jumping back and forth. Consider pop-ups within the electronic platform rather than links.

3) Modifications

- a) Zoning Modifications in the draft Zoning Ordinance should not be limited to Planned Development districts. (17-1-0)
- b) Zoning Modifications should be permissible in all zoning districts pursuant to an applicant's statement explaining how the modifications achieve equal or better solutions to meet the district purpose. Modifications would not be permitted to increase planned density, add a new use to a district, or propose to modify a definition. (14-3-1)
- c) Modifications or administrative flexibility should be allowed if an applicant is able to achieve conformance with the 2019 GP but unable to meet the regulatory standard by a nominal amount (example – applicant can only provide 29% open space and the requirement is 30%). (8-7-2-1)
- d) With guidance or standards, modifications should be available to encourage creative design to achieve equal or better solutions to meet the district's purpose.

4) Sustainability

- a) The term "sustainability" should be strengthened, and the principles of sustainability be incorporated further throughout the draft Zoning Ordinance. (9-4-5)
- b) Define sustainability.
- c) Incentivize sustainable initiatives or move sustainable practices and standards to the Facilities Standards Manual (FSM).

Findings and Recommendations

Zoning Districts

The Committee was generally receptive to the draft zoning districts, however, offered the following findings and recommendations on the Zoning Districts Chapter:

1) Zoning Districts

- a) Clarification is necessary regarding whether properties within the Route 28 Tax District will be remapped and how many zoning ordinances the County will administer. (11-1-6)
- b) In Mixed-Use districts, the required mix of uses and the vertical mix requirement is too high. These two requirements should be relaxed or eliminated if the applicant can demonstrate that their proposed mix of uses meets the 2019 GP goals. (15-2-0-1)
- c) Mixed-use requirements for height (vertical mix) and the required mix of uses should be more relaxed, flexible, and consider the surrounding parcels/uses during the legislative process.
- d) Revise or eliminate minimum building heights for individual buildings if targeted floor-area-ration (FAR) is met. These minimums do not allow for unique, pedestrian-scale buildings. (11-4-2-1)
- e) Eliminate or add flexibility to the minimum building heights in the UPA to encourage creative design and address situations where some buildings and uses cannot conform to the minimum height requirements.
- f) Relax block length requirements in Urban Transit Center/Urban Mixed Use (UT/UM), Suburban Employment (SE) and Transitional/Joint Land Management Area (JLMA) districts. (13-3-2)
- g) Block length requirements, to meet the goals of walkability, should be modifiable through a legislative process that considers the FAR goals, zoning and place type.
- h) AR-1 and AR-2 zoning districts should be renamed to ARS and ARN (respectively) to correspond to the Place Types in the 2019 GP. (12-4-1-1)

2) Draft New Planned Development Zoning District

- a) The Committee supports the proposed Planned Development Zoning District process, as it adds flexibility for future market shifts and supports innovation.
- b) The draft requirement to begin with a base zoning district, then modify it, will create a negative connotation associated with modifications.
- c) As drafted, the PD district does not minimize the need for modifications.

-
- d) A planned development application should provide an applicant with a “blank slate” in which to justify innovation that may not be able to adhere to individual regulations.
 - e) A planned development application should not be required to modify another zoning district. Such requirement to include zoning modifications would have a negative connotation to the public.

Additional items were discussed within the subcommittee but not discussed at the committee-of-the-whole due to either staff agreement or staff acknowledging that more research is necessary. Those items are found in Appendix 1, Pages 4-6, items 3-15.

Findings and Recommendations

Uses

The Committee was generally receptive to the tables, changes, reorganization, and revision to Uses, however, offered the following findings and recommendations for the Uses Chapter:

1) **Uses and Use Tables**

- a) Reduce the number of uses requiring Special Exception (SPEX) review, recategorize more uses to by-right and develop appropriate use-specific standards. (9-9-0) *With a tie vote, the final recommendation was inconclusive.*
- b) Those uses with similar offsite impacts should have consistent standards addressing the scale, intensity, density and location to minimize those impacts. (15-2-1)
- c) There are inconsistencies within use tables that need to be corrected. Uses and use-specific standards within these districts need to be more clearly defined as to not create loopholes and zoning enforcement issues.
- d) The ordinance provides no mechanism to consider or evaluate properties with more than one primary use in terms of location, total acreage, and intensity impacts. Provide standards to evaluate and address allowing multiple principle uses on a parcel to ensure compatible scale, use, intensity, character, and environmental protections, including, but not limited to, acreage calculation, scale, intensity, hours of operation, parking calculations, quantity of events and attendees, setbacks, buffering, road access, and noise.
- e) Develop more standardized use-specific standards, temporary use regulations for events, and performance standards requirements for similar or equivalent intensity uses. Standardization should include, but not limited to, noise, lighting, traffic capacity, road access, site constraints and design (amount of land disturbance, buffers, location/siting) that depend on the use's size, number of employees, number of patrons, hours of operation, ability to host special events, etc.

2) **Balancing Agricultural and High-Intensity Uses in Rural Policy Area**

- a) Agricultural uses should require a recognizable level of farming on-site. (12-5-1)
- b) Agricultural uses should require conservation of farmed areas on-site. (10-7-1)
- c) Require a larger minimum acreage for those agricultural uses that are considered "more intense." (11-4-3)

-
- d) Event management regulations need to be consistent throughout the ordinance. Event permits should be less cumbersome for off-site farm market events.
 - e) Some uses and terms are unclear or undefined. Examples include, but are not limited to: "Farm," "Historic," "Agricultural Operations," "Production Agriculture," "Agriculture manufacturing."
 - f) Develop regulations for non-event businesses hosting semi-regular events. Previous discussions by ZOC and draft language addressing this concern should be (re)considered, including review of draft text reviewed by ZOC in September/October 2021.
 - g) Clarify and define uses and terms:
 - a. Define "recognizable" or use a term that clearly identifies the goal and how much "farming" on-site is necessary to qualify as agriculture (i.e., percentage of land area devoted to farming or agriculture).
 - b. Define "high-intensity agricultural uses" and the additional regulations or use-specific standards for those uses that meet that definition should be consistent with similar uses.
 - c. Other examples include, but are not limited to: "Farm," "Historic," "Agriculture," "Agricultural Operations," "Production Agriculture," "Agriculture manufacturing."
 - h) Evaluate a tier system based on the intensity of uses for properties with more than one primary use.
 - i) Develop a mechanism to allow the existing uses to expand/modify without being subject to the SPEX. This will be similar to an administrative/minor modification of existing plan.

Additional items were discussed within the subcommittee but not discussed at the Committee-of-the-whole due to either staff agreement or staff acknowledging that more research is necessary. Those items are found within Appendix 1, Pages 7-9, items 3-12.

Findings and Recommendations

Development Standards

1) Streamlining and User-Friendly Standards

- a) [The Development Standards section is too dense, long, and overwhelming.](#)
- b) Reduce density and length of the Development Standards by dividing and reorganizing subsections. Consider dividing it into developer related topics (i.e., parking, utilities, site development) and environmental topics (i.e., NER, trees, landscaping, and buffering). (9-7-2)
- c) There should be more development standards and performance standards to increase historic resource protection. (10-8-0)
- d) There should be more development standards and performance standards to increase restoration of natural resources. (11-7-0)

2) Variation of Residential Lot Sizes

- a) [The Committee expressed general support of the concept of variation of residential lot sizes for SFD and SFA duplex, triplex, and quadruplex lots in the SN, SCN, TLN, TSN, and JLMA districts. The regulation requires projects containing 10 or more residential lots to include a mixture of lot sizes and dimensions. No more than 60% of all single-family detached, and no more than 60% of all single-family attached duplex, triplex, and quadruplex building lots, are permitted to be similar in total lot area. "Similar" lot areas in the SN, SCN, TSN, TCN, JLMA-LN, is defined as within 500 square feet of each other.](#)
- b) [Evaluate whether the variation requirement should apply to duplex, triplex, quadruplex.](#)
- c) [ZOC does not find that the variation needs to be dispersed and has concerns that too many requirements would complicate the application and negatively impact the goal of providing more affordable housing.](#)
- d) [Evaluate the parameters for similar lot size to determine whether they will create enough of a variation, as 500 square feet may be too small.](#)

3) Open Space

- a) [Revise and clarify open space bonuses and incentives to protect high-quality open space. \(12-0-6\)](#)
- b) [Add a prioritized list/checklist of environmental and historic resource protections to the open space requirements. \(13-5-0\)](#)

-
- c) Modifications or other tools to incentivize protecting high-quality open space should be considered. (18-0-0)
 - d) Allow modifications or other tools to incentivize protecting high-quality open space. An applicant may provide further protections for high-value areas as a trade-off for reduced front yards.
 - e) Maintain the current ability to count, buffer yards, ponds, unprogrammed lawn areas and other areas, towards open space requirements. (11-4-3)
 - f) Do not eliminate those areas that are currently permitted to count towards an applicant's open space requirement.
 - g) Limiting the use of land area within Floodplain Overlay District (FOD) to only 25% open space should be revisited. (13-2-3) This can have detrimental impacts on viability many parcels within the Broad Run watershed and can be a contradiction to recognizing the priority areas such as mature forests, as beneficial open space.
 - h) Off-site open space should be allowed, but only through a legislative process. (13-5-0)
 - i) Revise to allow off-site open space through legislative approval with standards, review, and justification.
 - j) The new requirement of 30% open space in commercial districts is too restrictive, particularly when combined with the reduced allowable areas. (11-5-2)
 - k) Maintain the current 20% open space requirement in commercial districts versus the draft 30% open space requirement.
 - l) Require an open space plan at the beginning of the legislative review process. (10-7-1)
 - m) Revise open space definitions so there is less interpretation regarding what types of spaces count towards requirements. (17-0-1)
 - n) Clarify open space definitions and explore reducing the multiple types of open space.

4) Lighting

- a) Lighting is a technical subject where industry expertise should be consulted. (17-0-1)
- b) "Color temperature" standards should be added to the existing lighting standards. (12-5-1)
- c) Lighting standards should be removed from the draft Zoning Ordinance and placed in the Facilities Standards Manual (FSM). (11-5-2)

5) Parking

- a) Reduce parking regulations overall to avoid over-regulation. (15-0-3).
- b) Remove parking standards in villages until small area plans are completed. (9-6-3)
- c) Revise the illustrations in the parking standards for clarity or remove the illustrations. (18-0-0)
- d) Reduce the 25% limitation on impervious areas for side yards to accommodate access for side or rear loaded garages. (13-4-1)
- e) Eliminate parking maximums within the RPA for all uses except large events. (14-3-1)
- f) Eliminate parking maximums for residential uses in all zoning districts. (15-3-0)
- g) Include the ability to modify parking requirements within the legislative processes resulting in an approved parking plan. (18-0-0)
- h) Revise parking maximums and required parking locations to not conflict with setbacks and buffers, creating unnecessary restriction. (9-2-7)
- i) [Develop parking maximums for large events in the RPA.](#)

6) Landscaping

- a) Revise landscaping regulations to require exclusion of invasive, non-native species. (15-2-1)
- b) Revise landscaping requirements to allow an alternative to turf grass in median plantings, while not conflicting with Virginia Department of Transportation (VDOT) requirements. (16-0-2).

Additional items were discussed within the Development Standards Subcommittee but not discussed at the Committee-of-a-whole due to either staff agreement or staff acknowledging that more research is necessary. Those items are found within Appendix 1, Pages 2-3, items 7-17.

Findings and Recommendations

Attainable Housing

The Attainable Housing Subcommittee initiated discussion acknowledging attainable housing is a challenging issue and that administering ADUs and UHNUs through the zoning ordinance represents only one of many attainable housing tools in the County's toolbox for achieving attainable housing goals. The Committee made the following findings and recommendations regarding attainable housing in the draft Zoning Ordinance.

1) Unmet Housing Needs Units (UHNU) Compatibility and Interspersion

- a) Make compatibility and interspersion requirements for UHNUs more flexible and/or making modifications simpler to pursue. Draft text requires site plans and subdivision plats to demonstrate that UHNUs are compatible with and interspersed among market rate dwelling units. To be considered compatible, UHNUs must be similar in width, depth, height, and exterior architectural treatment to market rate dwelling units in the development.

2) Affordable Dwelling Unit (ADU) Compatibility and Interspersion

- a) Make compatibility and interspersion requirements for ADUs more flexible and/or making modifications simpler to pursue. Draft text requires site plans and subdivision plats to demonstrate that ADUs are compatible with and interspersed among market rate dwelling units. To be considered compatible, ADUs must be similar in width, depth, height, and exterior architectural treatment to market rate dwelling units in the development.

3) Timing of Delivery of Affordable Dwelling Units and Unmet Housing Needs Units

- a) Provide more flexibility for the delivery timing of ADUs and UHNUs.
- b) Based on the draft text, occupancy permits for 50% of the ADUs must be issued prior to issuance of more than 50% of the market rate dwelling units occupancy permits for the development. Occupancy permits for 75% of the ADUs must be issued prior to issuance of more than 75% of the market rate dwelling units occupancy permits for the development. Occupancy permits for 100% of the ADUs must be issued prior to issuance of more than 90% of the market rate dwelling units occupancy permits for the development. The Committee finds more flexibility is needed regarding the timing of delivery for ADUs and market-

rate units. For example, consider linking timing to funding approval or loan closing. Examine allowing occupancy permits for all units once the funding is provided.

- c) When a developer provides more Affordable Housing Units (AHU) than required, they are still held to the same standard, meaning the calculation is based on AHUs, not the ADU requirement. Tie the delivery triggers to the required number of ADUs, not AHUs, that are additional to the requirement.

Additional discussion by the Attainable Housing Subcommittee is included in the Findings and Recommendations Matrix (Appendix 1, pages 7-11).

Findings and Recommendations

Transitioning to the New Zoning Ordinance

The Committee made the following findings and recommendations based on their understanding of non-conforming uses, vesting, and grandfathering.

1) **Non-Conforming, Vesting, and Grandfathering**

- a) The draft zoning ordinance should clarify whether a remapped property that does not meet new zoning district criteria (i.e., design characteristics, setbacks, parcel size, etc.) becomes non-conforming. (16-0-2)
- b) The draft zoning ordinance should clarify how properties subject to proffered development under the “Revised 1993 Zoning Ordinance, as may be amended” will be handled. (16-0-2)
- c) Reasonable grandfathering should be implemented as a transition to the new ordinance. (15-1-1)
- d) Grandfathering should apply to existing rural businesses if acreage requirements for their use increase. (17-0-1)
- e) The new zoning ordinance should clarify how a pre-existing by-right use is impacted if it is no longer a use included in the Use Tables. (Is it grandfathered? If so, for how long?) (16-0-1-1)
- f) The new zoning ordinance should clarify what happens if a by-right parcel is partially developed and whether the last phase/building needs to comply with new district regulations. (16-0-1-1)
- g) Clarification of grandfathering, vested rights, and non-conforming uses is necessary during this process.

Potential Future Zoning Ordinance Amendments

The Committee considered issues that could be separated from the Zoning Ordinance Rewrite project and addressed individually as stand-alone Zoning Ordinance Amendments (ZOAMs following Board adoption of the Zoning Ordinance).

The Committee decided that, while each issue could be further researched and developed as a separate ZOAM, the following issues should all be addressed within the new Zoning Ordinance during the Zoning Ordinance Rewrite project, if feasible:

1. Lighting
2. Flexibility
3. Consistent standards for high intensity uses
4. Sustainability
5. Solar

Appendix 1. Zoning Ordinance Committee Findings and Recommendations Matrix
Development Standards Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Finding	Recommendation	Opposing Comment	ZOC to Consider Y= Yes N=No
1	4/25/2022	GP Chapter 7 Implementation states two implementation priorities: a. the comprehensive review of the Zoning Ordinance and b. preparation of a Zoning Ordinance consistent with the Plan's policies, strategies and actions. Seeking confirmation that staff and the proposed ZOR has addressed these priorities.	More than 40 entries in the Implementation Matrix in Chapter 7 of the GP refer directly to Zoning Ordinance amendments, development standards or design guidelines. Chapter 5 Development Standards, alone or in conjunction with Zoning Districts, Chapter 2, and Use Tables, Chapter 3, directly addresses these implementation items with attention to clarified and user friendly language, the encouragement of retention and reuse of historic structures through adaptive reuse and nonconformity relaxation, incentives for protection of sensitive environments in open space, accessibility for all populations as well as accessibility to all areas of new development thru comprehensive pedestrian/bicycle and shared use path networks, improved natural and environmental protections, updated and expanded parking standards, consolidated transportation standards and improved lighting standards.	5.0	Consistency with CP	Still have concerns for streamlining and user friendly goals. Latest version can still use work. Reliance on hot links and jumping back and forth may not be most effective and efficient. Development standards have everything covered in one section, keep suburban section separate. Dev. Standards meant to apply across the board to all of the policy areas. Compared to older zoning ordinance and implementation, sometimes application can be different. Looked at it how it matches Comp Plan- specific references to sustainability and some environmental natural resource elements are missing. Subcommittee should provide list and can review during future meeting. Appropriate for ZOC to make their recommendation based on list.	The subcommittee consensus is that the characteristics of "streamlining" and making the new ordinance more "user friendly" have been noticeably improved but there is still much room for improvement. The current format including the hot links seems to encourage jumping back and forth which can be distracting and confusing and could be lessened. The subcommittee recommends ZOC discussion of additional methods to further streamline and improve ease of use.		Y
2	4/25/2022	Action 1.1.B. "Create incentives that provide the opportunity to implement design guidelines" Open space standards include bonus credit in meeting minimum % requirements as incentive to achieve protection of sensitive environments and historic resources. Seeking confirmation that the concept of providing bonus credit is appropriate and acceptable.	Credits for Inclusion in Open Space	5.04.04	Consistency with CP	Limiting inclusion of floodplain to 25% of total open space is an unnecessary limitation. Staff noted the addition of bonus credit for inclusion of floodplain that also contained proposed additional facilities such as trails, etc., and dedication to County as park if it meets adopted plan needs or recommendations (LPAT, GP, Broad Run, etc.) (see 5.04.04.B.4). Generally, the concept of bonus credit for important priority areas toward meeting open space requirement of district is a good incentive. However, subcommittee expressed much concern that bonus credit reduces the actual acreage of open space provided which would not be desirable in all cases and impacts development residents. Implies less importance of resource that receives less bonus (such as forest vs historic). Support the concept but the implementation needs more standards and a clear process that will ensure the benefits to development and County outweigh the reduced acreage of open space. Need to ensure sensitive environmental areas on site get protection in open space. Are there other ways to incentivize the provision of open space and protection of sensitive environments such as bonus density? Concerns about getting areas of open spaces that are not valuable such as too small or otherwise not useable. Suggest requiring identification and reservation of open space on sensitive resources first and then design development on remainder although actual process to accomplish that needs development. Possible credits for providing more than the minimum required. Should open space be addressed by policy area? Already is in some ways by differing % and type specified by policy area. Should bonus credit only be allowed in urban or suburban areas? What incentives would be most attractive to developers and residents?	The subcommittee agreed by consensus that the concept of bonus credits for inclusion of priority areas in open space be retained and further analyzed and developed with the inclusion of criteria and a process that would counteract the reduction of actual open space area. The ultimate goal of the analysis of the open space provisions should be the benefit to the residents of the community and the County.		Y
3	4/26/2022	Question arising during free discussion of member initiated questions.		5.08		Subcommittee member focused question on Section 5.08 and discussion expanded to Zoning Ordinance in general. Need to increase the references to sustainability by linking requirements to sustainability practices. Create a more inclusive purpose statement and provide incentives for sustainable development.	By consensus the subcommittee recognized the importance of identifying zoning practices that result in sustainability and did not object to including greater reference to it in the Zoning Ordinance. The subcommittee did not object to the possibility of a separate ZOAM to address the issue.		Y

Appendix 1. Zoning Ordinance Committee Findings and Recommendations Matrix
Development Standards Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Finding	Recommendation	Opposing Comment	ZOC to Consider Y= Yes N=No
4	4/25/2022	Action 7.3.A "Update Lighting Standards" includes Action 7.3.A.v. "To promote the International Dark Sky Associations standards." ZOC members commented on the lack of revisions to address Dark Sky standards in the 70% draft. Seeking confirmation that amendments to improve lighting standards is appropriate and acceptable.	Consolidation, improvement and expansion of light and glare standards to limit light trespass from most uses instead of only selected uses in current ordinance. Proposed text does not include all features of Dark Sky Model Ordinance determined by staff to be inconsistent with current policy areas.	5.08.05	Consistency with CP	Dark Sky requirements could be applied across all lighting standards. The suggested overlays do not neatly coincide with zoning districts or policy areas and may have required a drastic revision. Districts based on existing light levels and limitations to achieve least amount of additional lighting to the night sky. Did not change any requirements for uses that currently have requirements. More needs to be done, specifically, learning the impacts of bright white lights (temperature of light) on insects which have ecological effects. "It should be included in the rewrite." Make effort to maintain current nighttime darkness in rural areas and not increase existing light pollution in suburban and urban areas. Add specificity to where and how much. Reasonable compared to past ordinance. Great attempt to incorporate the dark sky standards. Concern for exemption for security lighting to be determined by Zoning Administrator. What are the limitations/standard to follow? Rewrite includes hours of operation limitations and retains the standards for and distinction between private and public athletic fields (schools and public parks). Schools limited to 10 foot candles for field and 5 for parking lot. Public athletic fields would be 10. Private athletic fields (Loudoun Soccer) not addressed but should be. Committee suggests make all athletic fields the same and consistent with standard that would apply to private athletic fields. Windows for time to shut down. Ex. Scott Jenkins park where surrounding area is dark so even lower intensity lightning has an impact. Concern for piecemeal changes that are found later to be troublesome or unintended consequences. Lighting is a technical topic. Need to define security, temperature standards, policy area standards. Should it be saved for a separate ZOAM. Adopt a Dark Sky Ordinance? Subcommittee unsure of its full understanding of proposal and complicated regulations of lighting.	Subcommittee consensus is that changes made are appropriate and an improvement but also recommend that the issues of standards and/or limits regarding temperature (effects on insects), criteria for Zoning Administrator to use in determining security lighting including a definition or criteria and modifying lighting limitations to address differences among policy areas should be investigated and added. The subcommittee suggested that it would be appropriate to initiate a separate ZOAM to further investigate the highly technical subject of lighting including analysis of the Dark Sky model and if it is appropriate and desirable for Loudoun County.		Y
5	4/25/2022	3.1.K.vii. "Amend the zoning ordinance and development regulations as needed to permit a percentage of the open space required on an individual site to be met through off-site permanent open space that creates a more usable, desirable, or environmentally significant open space." The recommendation to allow provision of off-site open space is not addressed in proposed standards and is an issue of concern as it lessens useable open space within the proposed development. Feedback from County staff also indicates concern. Needs subcommittee discussion and recommendation.	Proposed open space standards do not address or provide for off site open space to meet the minimum requirement	5.04 Open Space Standards	Consistency with CP	Concerns about allowing off-site open space. Not part of the development it is meant to serve and is not treated, maintained or used as was intended. Definition of off-site. Is this concept something to support especially in light of GP recommendation. Not addressed in current or rewrite. Often on the opposite side of the road from the development. As protected natural area or sensitive environment may be OK but as recreation area not accessible or maintained properly. Concerns that HOA may dispose of it. Option of allowing less credit toward total open space requirement if it is allowed off site. Allowed in other jurisdictions (Forest Conservation example). May be appropriate in Urban Policy Area to help focus density. Seems like a benefit to developer at cost to residents of community. Available only in special circumstances or case by case. Need specific criteria for case by case. May provide opportunities to gain public parkland or additions. Needs to be targeted and consistent with County's ownership and capital plans (CIP, PRCS, LPAT, GP). Have an option at rezoning if it meets criteria. An option worthy of being included if it presents advantage to the community. If it becomes an option the primary factor for approval should be the value of the open space to the community and costs to County, not if it is on or off site. Although there are strong reservations about permitting open space to be off site the subcommittee determined by a consensus that the concept is worth additional exploration. If included, there should be criteria and process that ensure off site open space is an advantage to the resident population, the County in general and not an economic burden to the County or residents and determined appropriate on a case by case basis.	By consensus the subcommittee agreed that off site open space should be an option with a low priority, and strict criteria and limitations such as: available only at the time of rezoning, limits on the percentage of the total amount required permitted to be off-site, consistency with other County adopted plans such as the GP, LPAT, CIP and others and preferably dedication to the County or enforceable requirements for maintenance. The benefits must outweigh the perceived and stated concerns	There is general concern and reservation about recommending off site open space as an option due to the concerns stated in the findings.	Y
6	4/26/2022	Parking is identified frequently in the GP as a critical design element to achieving Place Type goals which led to significant revisions to current parking standards that are presented in Section 5.05. Additional discussion is warranted. Revised parking standards tables will be provided.	Chapter 5, Subsection 5.05 Parking, contains tables and text providing minimum and maximum parking standards divided by policy area.	Chapter 5, Subsection 5.05	Consistency with CP	The subcommittee felt that the parking maximums are concerning, limiting where not necessary and over-regulation, especially for residential uses, as well as for specific policy areas. Suggestion that applicant be permitted to propose appropriate parking requirements based on acquired experience. Additionally, there was discussion on providing more parking reduction options for areas within proximity to the Metro/Transit, especially for residential development. Another key concern was Section 5.05.13 Specific Residential Design Type Parking- felt section was unclear and that subsection D (illustrations) should be eliminated.	The subcommittee agreed by consensus that the proposed parking standards, especially the concept of maximums and modifications for proximity to transit is worthy of discussion by ZOC to determine if there is ZOC consensus on concern for the new parking requirements and therefore a need for revision.	At least one subcommittee member was strongly supportive of not having standard requirements for multi family residential development and the concept of allowing those developers to propose unique parking standards for individual development based on their experience with current trends realized in the field.	Y

Subcommittees did not flag the items below this row for further discussion by the full ZOC. However, a ZOC member may flag an item below for further discussion during the ZOC Committee of the Whole meetings.

Appendix 1. Zoning Ordinance Committee Findings and Recommendations Matrix
Development Standards Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Finding	Recommendation	Opposing Comment	ZOC to Consider Y=Yes N=No
7	4/25/2022	Action 1.3.B (among others) "Identify strategies to preserve and enhance a community's sense of place, social fabric, and historic assets and functions." Seeking confirmation that proposed amendments address a GP priority to include significantly improved protection of historic resources through Adaptive Reuse and Open Space standards.	Adaptive Reuse, Nonconformities and Credits for inclusion in Open Space all identify historic resources as priority for protection and reuse.	5.10, 9.01.C.5 and 5.04.04.A.1	Consistency with CP	There are three places in the rewrite where we have addressed the importance of historic resources, 5.10 Adaptive Reuse, 9.01.C.5 Nonconformities and 5.04.04.A.1 Open Space bonus credits. Need confirmation that it has been addressed as envisioned in the Comp Plan. Are there suggestions to further protect historic resources? Committee felt that the sections addressed protection and reuse of historic resources and there is no need for more regulation. Adaptive reuse is focused on historic structures, but should it also include non-historic buildings. May be opportunities for affordable housing. Need some more investigation to determine if needed or desirable in non-historic buildings. Does it implement the GP completely if limited in the applicability? Concern for burden on Zoning Administrator to determine the value of the change of use, very narrow. Are sense of place items (other than buildings) protected enough?	Subcommittee agreed by consensus that adaptive reuse of historic structures recommended by the GP has been adequately addressed in the rewrite. Subcommittee expressed interest in options for reuse of non-historic structures.		N Staff will research and revise if needed
8	4/25/2022	The General Plan speaks often of the provision of open space but comprehensive general and type specific open space standards do not exist in the current Zoning Ordinance. Seeking confirmation that the proposed topics, general arrangement and standards provided in the proposed Chapter 5 address the GP recommendation.	To address this, Chapter 5 (in conjunction with minimums in Chapter 2, Zoning Districts) contains an extensive listing of sections (5.04.01 thru 5.04.12) to address the lack of open space standards.	5.04 Open Space Standards		Open space standards do not currently exist in ZO, proposed were developed from scratch looking at standards from other jurisdictions, APA guidance and known concerns. Need a general consensus that proposal has addressed GP recommendations. Concerns that it is such an expansive and new topic for the ZO that there could be conflicts. Should there be standards provision by policy area? (Addressed by varying % specified in zoning districts and policy areas and requirements for specific types of open space.) Prior to adoption there will be an effort to review the whole ordinance to look for and correct conflicts and that section references are correct. Management and modification process seems very complex. Examine that language and make sure we are not making it more difficult for maintenance. Modifications allowed only through PD districts process. Streamline the review and maintenance language. Well laid out, clearly organized. Discuss natural, environmental and heritage space - Is there a maintenance requirement/element to a tree save area? Make maintenance requirements clearer. What are we intending the maintenance requirements for natural areas to be? Did not think anything was missing but did not know what could be missing. May need to clarify Calculations of Open Space (Part C.1) regarding inclusion in an easement and current ZO permission to exclude public utilities. Concerns about connections to linear trails, maintenance costs and permanency of the open space.	The subcommittee agreed by consensus that the new open space section of development standards generally addressed the GP recommendations. However, there are still questions and concerns about the costs to an HOA of long term management and maintenance of open space and requiring use of the PD district to modify open space requirements.		N Staff will research and revise if needed
9	4/25/2022	Development standards are currently scattered among the districts promoting and allowing inconsistent application. Seeking confirmation that the proposed consolidation into one inclusive Development Standards chapter has achieved goal of simplification, consistency and user friendly priorities as well as improved standards recommended by the GP.	Chapter 5 Development Standards containing standards that apply to all development and often improved standards that improve the quality of development and achieving Place Type goals	5.0	Consistency with CP	Ordinance needed a separate Development Standards section because the current ordinance has a lot of standards scattered throughout. Committee members liked the layout and the purpose statement at the front. There is a feeling that the section is not entirely user-friendly. Many questions about the functionality of Encode that could address the concern for ease of use of the section. Search tool would address many concerns.	The subcommittee agreed by consensus that the organization and consolidation of development standards into one section minimally addressed the GP recommendations and also agreed that there is still much room for improvement of clarity and simplification which may or may not be addressed by Encode functionality.		N Staff will research and revise if needed
10	4/26/2022	Question arising during free discussion of member initiated questions.		5.05.13.d and 5.05.14.D		Parking for SFA units and garages, subsection D is confusing and the "must/similar" language is conflicting.	There was no agreement or recommendation.		N Staff will research and revise if needed
11	4/26/2022	Question arising during free discussion of member initiated questions.		5.07.02		Confusion as to whether street trees required in Road Corridor Buffer section (5.07.02) can be included in Tree Canopy coverage requirements of 5.06.	Subcommittee agreed there is need for clarification		N Staff will research and revise if needed
12	4/26/2022	Question arising during free discussion of member initiated questions.		5.07.04		Cemetery buffer- last sentence of Section 5.07.04.E- offsite cemetery burial ground or grave buffer is unclear.	Subcommittee agreed there is need for clarification		N Staff will research and revise if needed
13	4/26/2022	Question arising during free discussion of member initiated questions.		5.07.07		Need to provide recognition that plants, especially native plants are not just for visual impact but also functional impact for the ecosystem (host and nectar plants). Should increase requirement for percentage of native plants and link required plantings to function. Limiting grass and increasing tree cover or retaining existing tree cover can help with reducing maintenance costs for HOAs and improving water quality. Developing a credit system similar to open space to help achieve sustainability goals.	There was not acknowledgement of importance, but not an agreement or recommendation.		N Staff will research and revise if needed
14	4/26/2022	Question arising during free discussion of member initiated questions.		5.09		Section 5.09.03.B Midblock passage way. Clarify if it is to be provided on the roads or between buildings?	Questions raised by individual committee member with no opposition to revisions if needed.		N Staff will revise

Appendix 1. Zoning Ordinance Committee Findings and Recommendations Matrix
Development Standards Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Finding	Recommendation	Opposing Comment	ZOC to Consider Y= Yes N=No
15	4/26/2022	Question arising during free discussion of member initiated questions.		5.10		Continued discussion of the potential to expand adaptive reuse concepts to buildings that are not historic which would appear to be addressed in earlier adaptive reuse discussion. Table in 5.10 allows reuse with uses that may not be allowed in district if not adaptive reuse.	Questions and concerns raised by individual committee member with no opposition to revisions if needed.		N Staff will research and revise if needed
16	4/26/2022	Question arising during free discussion of member initiated questions.		5.11		Transition Areas - Concerns for absolute requirements without flexibility to address variety of unknown future situations. Concern for adjacent development dictating requirements across property lines. Confusion on the definition of perimeter setbacks	Questions and concerns raised by individual committee member with no opposition to necessary revisions		N Staff will research and revise if needed
17	4/26/2022	Question arising during free discussion of member initiated questions.		5.12		May want to revise the order. Items B.2-4 seem like requirements and better suited for the requirements section. Specify where HOA document amendments should be provided.	Question or concern raised by individual committee member with no opposition to necessary revision.		N Staff will revise

Zoning Districts Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Finding	Recommendation	Opposing Comment	ZOC to Consider Y=Yes N=No
1	4/26/2022	Housing Chapter 4, Action 1.1.D. Develop zoning regulations and design standards that facilitate innovative, lower cost, compact residential and mixed-use development that emphasizes the physical form and the character of the built environment and seamlessly integrates uses. Action 3.1.A. Develop zoning regulations and design standards that remove barriers and incentivize the development of housing affordable to households at or below 100 percent AMI in all residential and mixed-use development. ZOC Comment on variation of lot sizes. 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.	Included or retained a variation of lot size requirement for SFD and SFA duplex, triplex, and quadplex lots in the SN, SCN, TLN, TSN, and JLMA districts. The regulation requires projects containing 10 or more residential lots to include a mixture of lot sizes and dimensions. No more than 60% of all single-family detached, and no more than 60% of all single-family attached duplex, triplex, and quadplex building lots, are permitted to be similar in total lot area. "Similar" lot areas in the SN, SCN, TSN, TCV, JLMA-LN, is defined as within 500 square feet of each other. "Similar" lot areas in the TLN-10, TLN-3, TLN-1, JLMA-1, JLMA-2, and JLMA-3 Zoning Districts is defined as within 1,000 square feet of each other. Similar single-family detached and similar single-family attached duplex, triplex, and quadplex lot sizes must be distributed throughout a subdivision rather than grouped in one area.	2.02.01.D 2.02.02.F 2.03.01.E.4 2.03.02.E.3 2.03.03.E.2 2.05.01.D 2.05.02.F and 5.13	Consistency with CP	Support for lot size variation of residential lot sizes. Do not find that the variation needs to be dispersed. Difficult to determine or enforce whether lot sizes are distributed.	Recommendation to evaluate the parameters for similar lot size to determine whether they will create enough of a variation. 500 square feet may be too small. Re-evaluate whether dispersion requirement should apply. Confirm that dispersion of variety of lot sizes does not create an issue with ADU dispersion requirement. Evaluate whether the variation requirement should apply to duplex, triplex, quadplex. Evaluate whether there are too many requirements that would complicate application and feasibility.	Consistent lots leads to pleasing rhythm and pattern. Variation should be natural rather than grid pattern with variation in lot sizes. Variety should come from how people develop property individually/personally rather than required and should be completely removed. Mix of unit types achieves affordability and this section is redundant to achieve same effort. Maximum lot size, percent unit type, lot variation, and lot size distribution will complicate application of requirements and may not be feasible.	Y
2	4/26/2022	Current process allows applicants to modify individual zoning district regulations in the Planned Development and Suburban Zoning Districts. Current criteria are limited, poorly worded, and difficult to enforce. Applicants do not demonstrate why modifications are needed, how they improve upon current regulations, how modifications will be used in a project, or how they conform to the General Plan. In general, staff and the public are not provided with a clear understanding of how the modification will affect the overall development and whether the proposal is an improvement.	New Planned Development Zoning District revises the current approach to proposing modifications to individual regulations. With the exception of buffers and certain ADU Program regulations, the modification process is eliminated. Any modification to zoning district standards must be through the PD District. Regulations that can be modified as part of a PD proposal are listed, as well as limitations to these proposals and specific submission requirements. In general, the proposal must meet the General Plan, provide an overall plan of development (Master Plan), and demonstrate that the proposal achieves a higher quality design than if the base district standards were used.	2.06 and 7.09.09	Keep the ZO current	Adds flexibility for future market shifts. Allows people to be creative. General support for reducing the number of modifications proposed. Generally, good step in the right direction; it is good to give people options. Support for ability for staff to request a submission that shows what would be provided if they had to use base district standards as a way to demonstrate higher quality design.	N/A	Concern everyone will utilize PD district, but requirements may mean people don't use it. Enforcement and subjectivity will lead to more staff discussion ahead of application submission, especially to determine higher quality design.	Y
<p>Subcommittees did not flag the items below this row for further discussion by the full ZOC. However, a ZOC member may flag an item below for further discussion during the ZOC Committee of the Whole meetings.</p>									
3	4/19/2022	Received several ZOC comments about UE and Urban Transit Center/Urban Mixed Use (UT/UM) minimum district size of 40 acres.	Retained minimum district sizes needed to establish new UT/UM and UE zoning districts, but reduced the size from 40 acres to 20 acres. Retained the inability to modify the minimum district size. A larger, non-modifiable minimum district size ensures that the compact, pedestrian-oriented development pattern of a rectilinear grid of streets is established consistent with the associated Place Types. Also, in the Ashburn Metro area the UT/UM (PD-TRC) district is already established, so each new rezoning should be an incremental addition. Similarly, once the districts are established around the other metros, new contiguous rezonings should be incremental additions.	2.01.01.A 2.01.02.A.	Keep the ZO current	Concern 20 acres is not enough space to establish block development pattern. Easier to consolidate several parcels to meet 20 acre minimum district size (than 40 acres), which also allows the development process to start.	Recommendation to re-evaluate 20-40 acre minimum district size to ensure the size retains the ability to accommodate block development. Research Mosaic District, which may be about 17 acres. Confirm how open space is required for incremental additions. Would not want to reduce open space requirements for smaller additions.	None	N Staff will research and revise if needed
4	4/19/2022	The Urban Transit Center, Urban Mixed, and Suburban Mixed Use Place Types anticipate buildings with a vertical mix of uses.	Draft UT/UM Zoning District regulations require: UT Inner Core Subarea - minimum 70% of buildings. UT Outer Core Subarea - minimum 50% of buildings. UM Subarea - minimum 30% of all buildings. Draft SM Zoning District regulations require: Core - minimum 50% of all buildings. Fringe - no requirement. In both districts, single-family detached (SFD), single-family attached (SFA), and multifamily (MF) stacked dwelling units are not included in calculating required percentages of vertical mix buildings.	2.01.01.F 2.02.03.G	Consistency with CP	Mix is appropriate. PD-MUB requirements recently amended and reasonable. The UT/UM requirements are in line with these percentages (higher because more dense development anticipated). Market will consider interests of markets and not community. Concern for dense buildings regulations focus on FAR rather than number of dwelling units in the building. Units could be very large: this will not result in attainable units.	Recommendation for considering minimum number of units with floor pattern to meet growth demands and make the mixed use work as intended. Recommend calculating attached multifamily by both FAR and dwelling unit number to make ensure housing is attainable to a range of incomes. Also, to ensure density is created to make the mixed use district function. Require the size of units are provided at rezoning so that the County is assured that attainable units are provided. Ensure that bonus FAR available in the UM subarea and SM district also results in the provision of ADUs, not just FAR.	Market should inform the amount of mixed use buildings; it does not need to be prescribed by the government. What is the difference between an office building next to a residential building and a building that has a mix of office and residential uses?	N Staff will research and revise if needed
5	4/19/2022	Most Place Types have a preferred mix of uses. Primarily this mix of uses is by percent of gross land area, with the exception of the UT/UM, UE, and SM where the percent is of approved square footage.	Added Permitted Mix of Uses table that includes percentage ranges of uses consistent with the Place Types. Changed TCC use mix to percent of square footage to accommodate potential for live/work and residential over first floor nonresidential. Percent of land area or square footage must equal 100%.	Permitted Mix of Uses Tables in each zoning district except ARN, ARS, VC, VR 1, -2, -3, -4, VAR, JLMA-1, -2, -3	Consistency with CP	No issues with proposed Mix of Uses requirements.	Recommend including a regulation in the ordinance consistent with the 2019 GP for sites under certain acreage that allows the development to not meet the use mix.	None	N Staff will research and revise if needed
6	4/19/2022	Design amenities in the Urban Transit Center and Urban Mixed Use Place Types include anticipated plazas, pedestrian malls, network of green spaces, public art. The PD-TRC district (revised to UT/UM) has a requirement for one plaza in the inner core (UT Inner Core Subarea), but there has never been a minimum size requirement. The PD-MUB and PD-TC districts (consolidated into Suburban Mixed Use (SM)) each have a plaza requirement with a minimum size, which has been retained and revised with the consolidation.	The proposed UT/UM district regulations retain the plaza requirement with no minimum size for the UT Inner Core. Should we include a minimum plaza size for the UT Inner Core? How should we determine an appropriate size? Note, the plaza or other park-like space is allowed to count toward the minimum 5% public/civic space and the 10% open space requirement.	2.01.01.E.1 Table 2.01.01-1 Table 2.01.01-3 Table 2.02.03-4	Address specific issue	Oppose minimum size noting size does not equate to quality. Percentages create opportunities for consolidating space, but does not assure interesting space. Small can work but if it's small and done prescriptively, quality can diminish. Provide guidelines with purpose, goal, and intent to evaluate proposals including options and suggestions of favorable ideas or best practices without being too prescriptive. The suburban mixed use district should also not have a minimum size, but should have design guidelines.	Recommendation to develop guidelines for the required plaza. Should include a purpose and vision rather than specific elements. Guidelines should set expectations for these spaces, identifying what is anticipated and providing assurances for what will be favored. If size required it should be tied to the volume of people using the space.	No need for design guidelines, as it is hard to find a one size fits all and should be subject of a rezoning. Ideas should come from developers with Staff and Board to review.	N Staff will revise

Zoning Districts Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Finding	Recommendation	Opposing Comment	ZOC to Consider Y=Yes N=No
7	4/19/2022	Consolidated PD-OP, PD-IP, PD-RDP into the Suburban Employment (SE) Zoning District. The setback from residential or agricultural uses for each of these districts is different: PD-OP = 50 feet PD-IP = 75 feet PD-RDP = 100 feet	Retained 50 foot setback from residential and agricultural uses. This means that certain uses that were permitted in all districts, such as data centers, will be allowed the lesser setback. It also means that some uses currently only allowed in PD-IP, such as flex building, vehicle repair or rental, mini-warehouse storage, and general manufacturing will be allowed the lesser setback.	Table 2.02.05-1	Address specific issue	Yard setbacks by use rather than by district is an appropriate way to address certain uses in the consolidated districts. These yards by use would be included in the use specific standards for the use. Increasing or retaining agricultural yard setbacks might be appropriate, particularly in the SPA, where the property could develop as residential and the yard setback should be larger. Retaining agricultural yard setbacks in the TPA would be appropriate to protect view and visual transition.	Retain 50 foot yard setback as general SE requirement. Evaluate consolidated uses and identify need for additional use specific standards, particularly larger yard requirements for certain uses. Review agricultural use yard setback requirement. Determine how much and where agricultural uses are located in the SPA and TPA. Distance should be created based on the parcels remaining (location and number). TPA and SPA should be looked at and treated differently, particularly as related to agricultural uses, where the yard setback could be larger in the TPA. Evaluate consistency with General Plan on transition from east to west within the TPA.	None	N Staff will revise
8	4/19/2022	Several Place Types anticipate a street pattern that forms blocks (gridiron, rectilinear, rectangular) with varying minimum and maximum block lengths.	Included block street pattern requirement with minimum and maximum block lengths consistent with Place Types. Provided relief when natural, environmental, or heritage resources, district shape, or other features, such as railroad tracks, preclude creating blocks.	UPA Districts, SPA Districts (excluding SI, SME), TPA Districts (excluding TLN, TSN, TLI, TI, TME), JLMA Districts (excluding JLMA-LME)	Consistency with CP	Support for interconnectivity from one development to the next. Support for block pattern because it is easier to maintain, results in varied housing stock, closer knit communities, better walkability, and more efficient use of space. Cul-de-sacs discourage mass transit, requires children to ride school busses, increased pollution, creates exclusivity and expensive neighborhoods.	Research VDOT requirements for SAAR program. Research recent state code legislation does not remove connectivity requirement. Recommendation to incorporate descriptions and images of block types and street patterns for when blocks are required. Recommendation to allow more curvilinear streets that follow topography and natural contours for lower density residential development.	Curvilinear streets allow the avoidance of natural resources. Concern that regulation based on environmental features lead to subjectivity. Support for objectivity when considering block pattern. Cul-de-sacs still desirable to avoid through way traffic and is more desirable when considering 1 acre lots as opposed to block/grid pattern.	N Staff will revise
9	4/26/2022	Adoption of the General Plan and revision of road designations in the CTP caused conflicts along certain roads in the Urban Policy Area and more compact Suburban Policy Area Place Types. The County received an increase in the requests to modify Road Corridor Setbacks. Some of the modification requests are appropriate based on the Place Type. However, other requests have been for substantial reductions of Road Corridor Setbacks.	Revised Road Corridor Setback requirements as follows: Eliminated requirement (except for arterial roads, which retains reduced setback of 150 feet to 100 feet along Route 267) in the UT/UM, UE Zoning Districts. Reduced Structure Setbacks to be consistent with current Parking Setbacks in SM, SCN, SC, SE, and TCC. Allow Road Corridor Setbacks to be modified as part of a Planned Development District, including additional requirements for such a modification.	Section 5.07.02.A.6.a.3, Table 5.07.02-1 Section 2.06.C.1.h Section 7.09.09.B.2	Consistency with CP	Draft text addresses issue.	No additional revisions.	None	N
10	4/26/2022	Place Types have anticipated minimum open space that is a percentage of the gross area of a site. Currently, during the rezoning process an applicant commits to this requirement. Typically, applicants commit to meeting the minimum open space percentage consistent with the plan or more.	Open space requirements based on the Place Types are new to the Zoning District standards. In addition, the Planned Development Zoning District requires the minimum open space requirement to be met. It cannot be modified. Additionally, the open space standards award a bonus credit for certain open space, such as historic resources or LPAT trails, while awarding less than a 1 to 1 credit for spaces that are not usable, such as buffers or SWM facilities.	Chapter 2, Dimensional Standards Table for each Zoning District Section 2.04.C.8 Section 5.04.04	Consistency with CP	Support for not allowing non-usable space, such as buffers or SWM facilities, to get full credit to towards open space requirement. Concern that LPAT is consistently integrated throughout the Zoning Ordinance, especially in the Development Standards. Support for including requirement into the Zoning Ordinance. It will be harder to retrofit green spaces, particularly interconnected spaces with access points, after the fact. Consistent integration of LPAT is a way to do this.	Ensure definition of "Historic" and/or Heritage are applied consistently throughout the Zoning Ordinance. Ensure that Natural, Environmental, and Heritage Resources is defined in a way that is implementable. Re-evaluate consistency of integration of LPAT throughout the Zoning Ordinance. Ensure open space calculations required by the Zoning Ordinance are consistent with the General Plan.	None	N Staff will research and revise if needed
11	4/26/2022	Place Types have anticipated minimum open space that is a percentage of the gross area of a site. The Landscaped Open Space requirement is complicated to calculate and does not specifically address or take into consideration properties with large areas of natural resources.	Eliminated landscaped open space requirement in Mixed Use Districts. Draft zoning districts retain the current Landscaped Open Space requirement for nonresidential districts. Buffering and screening and parking lot landscaping requirements will still be required and achieve at least some, if not most or all, of a Landscaped Open Space requirement.	Chapter 2, Dimensional Standards Table for Mixed Use and Nonresidential Districts	Make user friendly	Removing the landscaped open space would remove a redundancy of requiring both open space and landscaped open space, which achieve similar goals, and reduces confusion.	Remove landscaped open space requirement.	Concern, particularly in Leesburg, that landscaping requirements for different uses between County and Town would create a stark difference. Concern "Easement" is not used consistently throughout different chapters.	N Staff will revise
12	4/26/2022	Housing Chapter 4, Action 1.1.D. Develop zoning regulations and design standards that facilitate innovative, lower cost, compact residential and mixed-use development that emphasizes the physical form and the character of the built environment and seamlessly integrates uses. Action 3.1.A. Develop zoning regulations and design standards that remove barriers and incentivize the development of housing affordable to households at or below 100 percent AMI in all residential and mixed-use development. ZOC Comment on maximum lot size: 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.	Included ADU Development Standards as base district standards to integrate more affordability. Introduced maximum lot sizes for SFD and SFA duplex, triplex, quadruplex in the SN, SCN, SM, TSN, TCN, and JLMA-LN districts. Introduced or retained a mix of unit types and added maximums for each in the UM Subarea of the UT/UM district, SN, SCN, SM, and JLMA-LN districts.	Tables 2.01.01-1 & -3 Tables 2.02.01-1 & -3 Tables 2.02.02-1 & -3 Tables 2.02.03-1 & -3 Table 2.03.02-1 Table 2.03.03-1 Table 2.04.03-1 Tables 2.05.02-1 & -3	Consistency with CP	Concern 10,000 sq ft in SN4 + SN6 with 50% lot coverage is too large and does not achieve affordability. Also, 4,000 sq ft house is not concerned with providing an rental accessory unit. Reducing lot sizes will allow 2 affordable houses as opposed to 1 expensive house. Support for more lot coverage rather than larger lots. Support for no maximum lot coverage on smaller lots. Must meet yard requirements instead. Support for ADU development standards as base standards. Support for maximum unit type mix to achieve affordability and decrease large lot SFD as effort to correct existing imbalances. Less flexibility is needed to address the imbalance. Concern lot coverages restrict accessory dwellings.	Confirm there is no conflicting language in SN where we are trying to reduce residential costs but also requiring dwellings are "built to highest quality". Reconcile as needed. Re-evaluate districts with small lots to see if no maximum lot coverage is appropriate (suburban vs transition). Re-evaluate current percentages, which do not align. Evaluate text with assumption that people will build to maximums possible, then determine if affordability goal will be met. Recommendation to check current unit mix commitments and applications to gauge proposed percentages, though this will be what the market currently supports. Evaluate whether smaller lots or dwelling unit count of a certain size should be allowed to not meet the unit mix percentages. Add "how to" calculate section.	Maximum lot sizes and unit type maximums are redundant. If a unit mix is achieved, the maximum lot sizes should not be required because the lot size is related to the unit size. Unit type percentage maximums by nature reduce lot sizes. Requirement of a certain mix limits flexibility and is not what the market will bear. SN4 + SN6 mix percentages do not allow flexibility for development community. Overall, reducing dwelling count and return. Residential market is consistently tight in Loudoun, any unit type is marketable/will sell. Cyclical real estate markets do not mean we should change zoning to what will sell during a downturn. Should be achieving a goals of the plan. Impervious surfaces and stormwater drainage are concerns often mitigated in more dense	N Staff will research and revise if needed

Zoning Districts Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Finding	Recommendation	Opposing Comment	ZOC to Consider Y=Yes N=No
13	4/26/2022	Each Transition Policy Area Place Type includes language about establishing significant, extensive, wooded setbacks, open space, and/or buffers along roads and at the perimeter of neighborhoods. Each Place Type also has a requirement of 50% open space (70% in some TLN-3 districts).	TPA perimeter setback of 100 feet along public roads forming subdivision boundaries and other subdivisions or developable land in a different Place Type. Retention and augmentation of existing native vegetation to screen subdivision from views from roads or other developments. Additional siting requirements to reduce visibility (below ridgelines, end of fields). Also, removed Road Corridor Buffer exemption for TLN-10 and TLN-3 (TR-10 and TK-3).	Each TPA Zoning District 5.11.E.1 5.07.01.B.2.a.	Consistency with CP	100 foot perimeter is the minimum, but no issue with increasing. All open space should not be forced to the exterior. Open space should not locate exclusively in the middle, should locate outside and along roads (exterior) exclusive of protected resources.	Increase 100 foot perimeter buffer. Ensure open space requirements balance placement on the exterior, to create the buffer anticipated by the 2019 GP, and protecting resources and providing internal open spaces.	100 feet perimeter setback is too small and should be increased. Ridgelines, ends of fields will be tough to meet on individual basis. Concern how this will be evaluated in plan proposal/process.	N Staff will revise
14	4/19/2022	In the Place Type uses, MF is not specified as attached or stacked. In the Urban Transit Center and Suburban Mixed Use Place Types, MF is a Core Use. MF and SFA are core uses in the Urban Mixed Use Place Type. In Suburban Mixed Use Place Type, SFA is a Complimentary Use. Suburban Neighborhood Place Type identifies MF as a Complimentary Use, while Suburban Compact Neighborhood indicates it is a Core Use.	To ensure the appropriate amount of MF attached and MF stacked is provided, the districts treat MF stacked similar to SFA, since the building type is more similar to stacked townhouses. MF Stacked is allowed as follows: UT Inner and outer core: not allowed (also would not meet minimum height). UM subarea: allowed MF stacked and SFA to be 50% of land area. SM District: allowed MF stacked and SFA to be 10% of the land area in SM Core if no fringe is provided or 10% of SM Fringe land area. SN District: allow only MF Stacked, cannot exceed 5% of units in SN-4 and 15% of units in SN-6. SCN District: MF Stacked only is allowed, cannot exceed 15% of units in SCN-8; MF Stacked cannot exceed 20% of units in SCN-16 and 25% of units in SCN-24; MF Attached is allowed to be 75% of the units in SCN-16 and 100% of the units in SCN-24. Also established MF stacked requirements for certain districts.	Table 2.01.01-3 Table 2.02.01 3.06.02.09	Consistency with CP	Appropriate to treat multifamily stacked like a single family attached townhouse (rather than multifamily attached). Support for mix of unit types: unsure of whether the mix is correct. Supports moving away from SFD only and the proposed unit mix requirements correcting existing imbalances. Important to allow each type and range of housing to avoid "bedroom community" where people who work in a community cannot afford to live there. Important to accommodate a range of unit types to address a range of incomes.	Ensure mix of unit type regulation will work for smaller sites, such as 5 acres. Evaluate whether unit mix requirements should apply to smaller sites of a certain size. Ensure that % of land area requirements for SFA and SFD also result in smaller, denser units and lots. Unit type mix percentages should be based on data that demonstrates the imbalance of unit types in the County. Consider proactively rezoning areas to ensure higher density with an appropriate mix of unit types is achieved.	Concern certain developers may be squeezed out if they do not develop certain type of housing, such as multifamily attached. Concern the numbers do not account for enough infill and density should be higher to accommodate further in the future. Percentage should apply to a larger area, not a site. Interested in a banking system for larger developments to give leftover unit types to smaller developments, such as allowing all multifamily from a larger project to be placed on a small infill site.	N Inconsistent with 2019 GP
15	4/19/2022	Received several ZOC comments about Urban Employment (UE) Zoning District, including minimum 40 acre district size, grid of streets/block requirement, incorporating Broad Run floodplain into development or park, and limitations of current development pattern.	District regulations implement the Urban Employment Place Type, which is the envisioned development pattern. It does not attempt to accommodate the current development pattern or uses. The current districts will be renamed Suburban Employment (SE), and a rezoning to the UE district would be necessary. This Place Type anticipates a rectilinear or gridiron street pattern with specified minimum and maximum lengths. The block regulations anticipate natural resources and other barriers and in these cases allow revisions to block lengths or a more linear development pattern. The Open Space Standards support creation of a linear park along Broad Run by allowing 100% of floodplain to count toward open space if it is provided as a park or has a trail consistent with the LPAT Plan. Otherwise, 25% of the floodplain can count toward the open space requirement. The minimum district size is addressed below.	2.01.02 5.09.02.B 5.04.04.B.4	Consistency with CP	Support for incorporating use of the Broad Run floodplain as a park by creating an incentive that allows 100% of floodplain on a property to count as open space if park or trail consistent with the Linear Parks and Trails (LPAT) plan is provided. Support for block standards and flexibility incorporated into development standards. Concern district requirements are too prescriptive and unrealistic, especially due to existing conditions including natural resources, drainage, sewage, surrounding properties, and, in light of existing development pattern, redevelopment. District regulations do not address these limitations.	Access to trails and parks from properties should be addressed. It should include maintenance of access, parking, and open access points for people coming to use those areas. Emphasis on access from metro station to trails and parks. It could be a path to other areas in the County, including other employment areas. Need to do this now, not after development has occurred. Review draft regulations to identify opportunities to accommodate existing development pattern when applying the UE district. Note: Redevelopment standards to be drafted by the consultant may be able to address this concern.	Concern about allowing data centers in this area because they are not big employment generators, which is a goal of the district. They should not be permitted here. This valuable real estate should be used for something else that generates more employment and takes advantage of location near the metro. Note: Discussion during the meeting assumed that data centers are not supported in Urban Employment. This was an error. Data centers are listed as a Core Use in this Place Type.	N Inconsistent with 2019 GP

Use Standards Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Finding	Recommendation	Opposing Comment	ZOC to Consider Y=Yes N=No
1	4/27/2022	Received several comments on the proposed uses permitted in the ARN and ARS zoning districts.	Uses are identified in the proposed Use Tables. Which uses should be permitted by-right, not permitted or permitted by special exception?	3.02.01 3.02.02 3.02.03		The subcommittee stated there are 15 to 20 potential high-intensity uses that should have legislative oversight and require a SPEX. If these uses are successful it may cause negative impacts to neighbors. Examples of high-intensity uses include: country inn, limited brewery, campground, banquet event facility, theater, auto, cultural facility, telecommunication, etc. It was noted that existing businesses could be subject to SPEX if they consider expanding the use and the County cannot deny use because other similar uses exist. The subcommittee would like to see a mechanism to allow the existing uses to expand/modify without being subject to the SPEX. This will be similar to an administrative/minor modification of existing plan. To make it less cumbersome, consider annual permits for multiple off-site farm market events rather than 1 permit for 1 event. As many agriculture-related uses to be allowed by-right or minor SPEX as possible. More intense uses in the ARS and ARN should be separated and implemented through an overlay district or sub-district while other uses should be removed. There are inconsistencies in the use tables that need to be corrected. Village uses need to be clarified to address any possible confusion between residential and commercial uses.	The subcommittee agrees the uses and standards within these districts needs to be more clearly defined as to not create any loopholes, a tier system based on intensity of the use should be considered, consideration should be given for properties with more than one primary use, and consider mechanism o exclude uses within overlay districts.	A member noted that a number of uses have the potential to be too intense for the district and surrounding area, these include: P/M and P/S possible problems = Country Inn (a major problem), Restaurant, Rural Retreat, Commercial Winery. M possible problems = Rural Resort, Banquet/Event Facility (a major problem), Campground. P can be huge problems and some are vague = Limited Brewery, Great Farm/Ranch, Agriculture Cultural Center, Cultural Tourism, Feed Lot. Also notes these uses are not a problem because they are not allowed = Hotel/Motel, Farm Equipment Repair, Auto Repair. Also notes these uses already require a SPEX and thus are not a problem = Amphitheater, Cultural Facility, Conference/Training Center, Active Recreation.	Y
2	4/26/2022	9.5.A. Adopt solar zoning and permitting best practices for accessory use solar development. 9.5.B. Become certified as a "solar-ready" community under the Department of Energy's SolSmart program.	To assist in addressing this action, specific use standards have been drafted for commercial solar facilities. Staff is requesting review and comment on these use standards.	3.06.07.04	Consistency with CP	Height of solar panels should not exceed 15 feet. Minimum lot size should be 5 acres to achieve the needed megawatt. Add regulations for transmission lines. Require all new utility lines to be buried. Require a glare study when proposed location is within close proximity to an airport. Develop measures to minimize impacts on viewsheds. With the best locations for this use being in the rural areas of Western Loudoun it may not be necessary to require access from a 20-ft wide paved road because many will be low-traveled gravel roads. How will abandonment of a project be determined and tracked? Consider allowing commercial solar as an overlay district? Consider allowing in conjunction with data centers. A comparison map to high-voltage transmission lines may be necessary to appropriately site these facilities. Consider allowing commercial solar facilities within the rural areas, which is where property owners are receiving solicitations from solar companies.	The subcommittee understood standards for commercial solar facilities are necessary given the increased awareness and acceptance of the technology and that property owners are receiving solicitations from solar companies. However, with most of the opportunities for this use being in the western rural areas of the county, the allowance for these facilities should be expanded to the rural districts. To be consistent with other districts, establishment of this use should be allowed only through approval of a special exception. The subcommittee also had questions and concerns about the decommissioning plan with regard to regulation, monitoring, enforcement, and the requirement of a performance bond.	None.	Y
Subcommittees did not flag the items below this row for further discussion by the full ZOC. However, a ZOC member may flag an item below for further discussion during the ZOC Committee of the Whole meetings.									
3	4/26/2022	To provide additional dwelling unit types, specific use standards should be provided for live/work dwellings.	To address this need, use standards have been drafted for live/work dwellings. Staff is requesting review and comment on these use standards.	3.06.02.03	Clarify regulations	Add Art Studios as permitted use by-right. Concern with outdoor storage screening requirements. Live/work unit use is generally uncommon in the County and is difficult to implement. Request clarification on live/work vs. mixed-use vs. home occupation. Live/work = own both units; mixed-use can be leased; home occupations are small scale and not a primary use. Add cross-references. The intensity factor plays an important role in differentiating. Section C.2.F. establish a measurement for excessive noise, traffic, deliveries, etc. and provide specific guidelines. Section C.2.G. base prohibited vehicles on maximum vehicle weight rather than vehicle type. Limitation on vehicle signage should remain in place. To maintain long-term viability, consideration should be given to permit the transfer, sell or lease of the "work" portion of the dwelling. Clarify the allowance of live/work dwellings within the districts. Consider establishing a list of uses suitable for live/work dwellings rather than allowing those uses permitted within the underlying zoning district.	While in agreement with the draft language for the most part, the subcommittee believed clarification should be provided that would identify a clear distinction between live/work dwellings and home occupations. Also, restrictions or limitations on operational standards for the use should not be subjective rather based upon definitive measures. As noted, staff will consider the subcommittee concerns and revise the draft text accordingly.	None.	N Staff will research and revise if needed

Use Standards Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Finding	Recommendation	Opposing Comment	ZOC to Consider Y=Yes N=No
4	4/26/2022	Several comments have identified a need for specific use standards for mobile vendors (i.e., food trucks).	To address this concern, standards have been drafted to limit where they are permitted, the number allowed onsite, and their location. The staff is requesting review and comment on these use standards.	3.06.04.17	Address specific issue	<p>Consider separating into "mobile vendor, food" and "mobile vendor, other" because there is a wide range of mobile businesses.</p> <p>Proposed regulations are okay for temporary uses/events. There are, however, too many specific regulations such as car dimensions.</p> <p>There is concern the proposed regulations will not work in real world situations. Consider modifying the hours of operation, number of vendors allowed at a single location and the standards for mobile carts. Use of a public address (PA) system should be limited to announcing when orders are ready. The location of trash cans should be at the vendors discretion. Unnecessary language such as keeping the seating areas free from trash, etc. does not seem necessary to include. Important to note, the issues seem to revolve around food vendors, but not other mobile vendors such as clothing store, horse tack, dog wash, nail salon, etc.</p> <p>The use table needs to be updated because it does not allow the use in any districts. Wants to clarify these vendors are businesses and not simply an accessory use. Any sketch plan should include customer parking. When adjacent to residential, generator noise should also be regulated. Need to address health, safety, welfare concerns related to water hookups, backflow, sanitation.</p> <p>It was noted that, in part, these regulations are attempting to reach a balance between mobile vendors and brick and mortar restaurants.</p>	Based on the comments staff will examine the difference between "mobile vendor, food" and "mobile vendor, other" with the understanding that they may function differently. The draft language will be revised accordingly. It is also understood that the standards as noted should be revised to reflect their real world application. The allowance for this use will be added to the relevant use tables.	Should be under the purview of the Health Department instead of Zoning Ordinance.	N Staff will research and revise if needed
5	4/26/2022	The ordinance does not include specific standards for donation drop-off boxes. Through interpretation, they are currently included under the category of recycling center.	To address this concern, standards have been drafted to identify and regulate donation drop-off boxes as an accessory use. The staff is requesting review and comment on these use standards.	3.04.G	Address specific issue	<p>Donation drop-off boxes should be weather-proof, water-proof, and rust-proof like containers for recycling centers.</p> <p>The donation box may be most appropriate near residential. Functional issue with mixed-use districts that may become residential one day—the area is regulated differently—need to be more precise on how to appropriately regulate the situation.</p> <p>Exemptions for non-profits should be flexible and allow placement of drop-off boxes in the front of the building. Intent is to prevent them from being used as a dump.</p> <p>Staff noted drop-off boxes are considered to be an accessory use to any parking lot.</p>	The subcommittee generally approved of the draft language with suggested modifications. Those modifications included standards for the container construction, simplifying the language, and providing flexibility for placement at non-profit organizations.	None.	N Staff will research and revise if needed
6	4/27/2022	3.2.B. Evaluate and revise zoning regulations and design standards to permit a variety of accessory residential unit types, such as accessory apartments for seasonal farm laborers and year-round tenant housing, that support the rural economy. Received several comments on the draft standards for seasonal labor dormitories.	Discuss those draft standards and how they should be modified.	3.06.02.07	Correct errors & inconsistencies	<p>The subcommittee stated that similar to live/work there is a need to define where one use ends and the other begins so the regulations are focused correctly. The following issues should be addressed: use of the terms, parcel vs. lot, and how it relates to the court case with co-housing; identify building type(s) allowed in open space; why is minimum square footage higher in Loudoun County than what is allowed by IRC and OSHA; certain farm activities require less workers than others and thus should be allowed fewer residential structures, consider a scale based on number of tenants per acre; use should tie into true agricultural production not hobby farms; why is tenant dwelling a SPEX and others can be modified; the need for a SPEX can be prohibitively costly; temporary housing needs architectural requirements/building materials; need to establish bathroom facilities. Consider using the term "on the property or farm" rather than "onsite." Clarify if building code requires permits for residential units or is it exempt like other farm structures.</p> <p>No SPEX if already establishing use-based standards. What other regulations would there be?</p>	The consensus within the subcommittee is to make any process for agricultural activity as less cumbersome as possible while also being aware of any impacts potentially created by having multiple residential structures on a property. Staff will research the concerns provided by the subcommittee and revise the draft language as necessary.		N Staff will research and revise if needed
7	4/27/2022	Several comments have identified a need for a more comprehensive definition for "farm."	To address this concern, a new definition has been drafted. Review and comment is requested.	3.03.07	Clarify regulations	<p>A clear definition of agriculture that ties back to the definition of farm should be provided. Consider using terms already defined by other groups like the state, REDC, Farm Bureau, etc. Include the processing of agricultural products. Farms should require a minimum acreage for production, not processing. Avoid language that generalizes the use of the property. Consider identifying a percentage threshold for production and processing. Consider requirements for the creation of production agriculture. Consider the inclusion of tax assessment classification or a farm plan as a requirement to be considered a farm that meets the ZO definition. Establish a minimum acreage for wineries and breweries that are compliant with state definitions/rules as well as additional County regulations such as minimum acreage and minimum percentage of production. Acreage cannot be more restrictive with local regulations than the state. Recognize boutique farming as well as commercial farming. Allow minor changes to be exempt from full site plan review, and when a small change is proposed do not open up the whole site to meet new regulations, limit the review to the impacted area only.</p>	The subcommittee recommends clarity and specificity be provided to the proposed definitions for farm, agriculture, and other relative uses. Staff will review for consistency with state regulations and revise accordingly.	Remove the need for a farm plan as it hurts the equine industry.	N Staff will research and revise if needed
8		Open discussion item				Religious housing, improve/add definition and address appropriate parking.	Staff will research this issue and provide a definition.		N Staff will research and revise if needed

Use Standards Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Finding	Recommendation	Opposing Comment	ZOC to Consider Y=Yes N=No
9		Open discussion item			Consistency with CP	The event management regulations need to be consistent throughout the ordinance. Previous discussions and draft language addressing this concern should be considered. The regulations for non-event businesses hosting semi-regular events should be presented to ZOC for review and inclusion in the draft ordinance.	Staff will research this issue and address in a future ZOC meeting.	Several subcommittee members agreed it should be a new business agenda item at the May ZOC meeting, but not necessarily as a recommendation from the subcommittee.	N Staff will research and revise if needed
10		Open discussion item		3.06.08.01.C		Section 3.06.08.01.C. Conservation Farm Plan. This is aspirational language that equine owners see as onerous. This language should be removed to allow smaller farms to operate. This is not a zoning issue and should be in codified general ordinances. Soil, Water, and Conservation has guidelines to prepare and monitor farm plans.	Staff will research this issue and revise the draft language as necessary.	If removed it could allow unsuitable uses on the side of a mountain. Without the plan, there is no mechanism for enforcement.	N Staff will research and revise if needed
11		Open discussion item				Any business with an ABC license is regulated by square footage. Should that calculation be used for parking regulations, traffic trips, number of patrons, etc. Occupancy permit may also establish a maximum occupancy that can be used to address this concern. Occupancy Permits are not required for agriculture-related uses. Inconsistent to not have the same type of health, safety, and welfare matters. (CH) floor area net should not include outdoor areas, see outdoor spaces	Staff will research this issue and revise the draft language as necessary.		N Staff will research and revise if needed
12		Open discussion item				Identify the difference between a monopole, telecommunication facility and communication facility. Each is defined and regulated differently, but differences are unclear.	Definitions and any possible standards will be drafted to identify a clear distinction of these uses. It is understood that FCC rules will provide some guidance.	None.	N Staff will research and revise if needed

Attainable Housing Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Subcommittee Finding	Subcommittee Recommendation	Subcommittee Opposing Comment	ZOC to Consider Y=Yes N=No
1	4/19/2022	Received comments about how to provide Affordable Dwelling Unit (ADU) Homeownership Units in Place types that only allow single family detached products. This limits creativity and the ability of applicants to provide more affordable units.	ADUs are not permitted to be provided in a dwelling unit type that is not also provided as a market rate unit in the development application or project.	8.01 D. 3.	Address specific issue	Support for more flexibility around meeting Chapter 8 requirements in single family detached place types around unit type. SFA units would be required to look like SFD: supported by policy and this unit type flexibility would be limited to ADUs.	Recommend allowing SFA products for ADUs in place types that only allow single-family detached units. Support for only applying to rezonings. If not ADUs, recommend allowing for UHNUs.	Concern about this proposal as the BOS made the decision to remove SFA from specific place types. Do not support this flexibility within the TPA. Concern about defining the flexibility and what to with an ADU that doesn't sell but is SFA?	Y
2	4/5/2022	Concern that draft new language around ADU compatibility and interspersions is too prescriptive and not modifiable. Concern about the cost related to meeting the new requirements. Also feedback that currently the Design Book can be changed administratively. If the language is codified, it becomes more challenging to change.	ADU Compatibility/Interspersions language	8.01 H	Clarify regulations	Need more flexibility for compatibility and interspersions or the ability to modify the requirements.	Recommend making compatibility requirements more flexible and/or making modifications simpler to pursue	N/A	Y
3	4/5/2022	Concern about requiring bedrooms to be the same dimensions between ADUs and market-rate unit	Bedrooms in MF stacked and MF attached ADUs are the same dimensions and number of bedrooms in equivalent market rate dwelling units in the development.	8.01 H. 3	Address specific issue	Support for removing "dimensions" from 8.01 H.3 and requiring only the same number of bedrooms.	Only require the same number of bedrooms for ADUs and market-rate units	N/A	Y
4	4/19/2022	Concern about timing related to delivering ADUs and market-rate units. Having different developers for market rate units and AHUs makes it difficult to meet the occupancy trigger. Questioned how the calculation/timing applies to developments providing more AHUs than required. AHUs held to the same requirement in terms of timing. The delivery of a Multi-family AHU building is very different than the delivery of MF Stacked Units.	Occupancy permits for 50% of the ADUs must be issued prior to issuance of more than 50% of the market rate dwelling units occupancy permits for the development. Occupancy permits for 75% of the ADUs must be issued prior to issuance of more than 75% of the market rate dwelling units occupancy permits for the development. Occupancy permits for 100% of the ADUs must be issued prior to issuance of more than 90% of the market rate dwelling units occupancy permits for the development.	8.01 I	Address specific issue	Support for more flexibility around timing of delivery for ADUs and market-rate units. Also difficult when a developer provides more AHUs than required, they are still held to the same standard (e.g. calculation based on AHUs, not ADU requirement).	Recommend flexibility for AHU timing - Ideas were to link to funding approval, loan closing, etc. Once the funding is provided, some support for having Zoning release all of the units. Support for tying the delivery triggers to the required number of ADUs, not AHUs that are additional to the requirement.	N/A	Y
5	4/5/2022	Discussed value in providing some or all ADUs off-site because of limited land area in certain parts of the County like the Urban Policy Area.	Notwithstanding Sections 8.01 J.6.a and b. above, any request for rezoning, special exception, site plan, subdivision, or preliminary subdivision that contains only SFD dwelling units, a modification may be requested to provide developable land within the development or cash in lieu of the ADUs. If an applicant requests a modification to make such cash payment or land dedication, the following criteria applies:	8.01 J 6 c	Address specific issue	Support for providing flexibility to allow ADUs to be provided offsite or to provide a percentage of ADUs offsite, especially within the UPA, on a case by case basis.	Recommend allowing ADUs to be provided off-site for developments within the Urban Policy Area if they meet certain criteria. Example, within a certain radius, integrating with school sites	N/A	Y
6	4/19/2022	Concern that draft new language around Unmet Housing Needs Unit (UHNU) compatibility and interspersions is too prescriptive and not modifiable. Concern about the cost related to meeting the new requirements. Also feedback that currently the Design Book can be changed administratively. If the language is codified, it becomes more challenging to change.	UHNU Compatibility and Interspersions requirements.	8.02 F	Clarify regulations	Need more flexibility for compatibility and interspersions or the ability to modify the requirements.	Recommend making compatibility requirements more flexible and/or making modifications simpler to pursue	N/A	Y
Subcommittees did not flag the items below this row for further discussion by the full ZOC. However, a ZOC member may flag an item below for further discussion during the ZOC Committee of the Whole meetings.									
7	4/19/2022	Concern about term "occupancy permits." Multi-family buildings are issued occupancy permits for the entire building and then occupancy permits for each unit.	Occupancy permits for 50% of the ADUs must be issued prior to issuance of more than 50% of the market rate dwelling units occupancy permits for the development.	8.01 I	Clarify regulations	Concern that the new language is not clear about how occupancy permit is defined.	Recommend tying occupancy to building, instead of unit.	N/A	N Staff will research and revise if needed
8	4/5/2022	Expressed feedback that the 180 day timeline described is not accurate or that the review does not actually happen in 180 days but takes at least 10 months before getting to PC and BOS. Takes approximately 5 months just for public hearings. Related to this discussion was an idea to allow expedited review for projects providing more than the required number of ADUs.	Expedited Review.	8.01.A.5.b	Address specific issue	Need to carefully look at this language around the timeline. Support for putting into an administrative document similar to expedited process for data centers or consider in Article 6.	Not Zoning Ordinance Related – Practice Concern, Administrative/Implementation: Outside the Scope of the ZO Rewrite.	N/A	N
9	4/5/2022	Concern about placement for applicability as well as how defined (adoption date v. effective date)	To active rezoning applications that have not complied with Section 7.09.01.1 as of the adoption date of this Ordinance. To rezoning, special exception, site plan, subdivision, and preliminary subdivision applications officially accepted by the County after the adoption date of this Ordinance.	8.01 D.1 and D.2	Clarify regulations	Support for applicability being defined as the effective date of the ZO.	Staff will review this language and consider how to define applicability per this suggestion	N/A	N Staff will research and revise if needed

Attainable Housing Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Subcommittee Finding	Subcommittee Recommendation	Subcommittee Opposing Comment	ZOC to Consider Y=Yes N=No
21	4/5/2022	Dispersion of AHUs	A development that provides the same number or more AHUs as the number of ADUs required under Section 8.01 D.3 and 4 above will satisfy the ADU Program requirements.	8.01 K.	Clarify regulations	AHU program: does not specifically state that you are exempt from dispersion. Support specifically stating that AHUs are not subject to interspersing throughout the project.	Staff considered this suggestion. Because there is no requirement to intersperse units, more explicit language seems unnecessary.		N
22	4/5/2022	Organization of 8.01 K. AHUs	The applicant must provide written verification to the Zoning Administrator from the applicable affordable housing program of the approval of funding to provide AHUs. Until such written verification is provided by the applicant, only ADUs are permitted to be provided to meet the requirements of the ADU Program.	K.5. a.	Clarify regulations	Concern about organization of this section.	Recommend moving this language farther up in the ZO.	N/A	N Staff will research and revise if needed
23	4/5/2022	Concern about the placement of violations and penalties in the	In addition to enforcement under Section 10.01 et seq., the following apply whenever any person, whether owner, lessee, principal, agent, employee, or otherwise, violates any provision of the ADU Program, or permits any such violation, or fails to comply with any of the requirements hereof	8.01 L. L.	Clarify regulations	Concern that violations and penalties should not be in the zoning ordinance. Concern that should be in the Codified Ordinance.	Staff will review and consider	N/A	N Staff will research and revise if needed
24	4/19/2022	Accessory units: How to incentivize accessory units	N/A	N/A	Address specific issue	Need to have an exemption to allow for these types of units. Worthy of discussion in the actual districts as well. How to incentivize accessory units	Recommend considering accessory units as way to provide ADUs or UHNUS	N/A	N
25	4/5/2022	Want to see Habitat for Humanity as an AHU option	AHU programs/definitions	8.01 K.	Address specific issue	Add Habitat for Humanity to eligible AHU programs	Staff believe Habitat homeownership programs could be added as an AHU option.	N/A	N Staff will research and revise if needed
26	4/5/2022	Chapter 8 title	"Attainable Housing"	Chapter 8 Title	Make user friendly	May want to look at calling this section something other than Chapter 8: Can this be article 7 instead? Could switch it with the definitions chapter	Staff looking at changing the chapter # for Attainable Housing	N/A	N Staff will research and revise if needed
27	4/19/2022	Develop zoning regulations and design standards that remove barriers and incentivize the development of housing affordable to households at or below 100 percent AMI in all residential and mixed-use development. Chapter 4 Action 3.1 C	This section applies to UHNUS provided as part of a development application for rezoning, special exception, site plan, subdivision, or preliminary subdivision, as submitted by the applicant: a. To achieve an adjusted FAR in the UM Subarea of the UT/UM District pursuant to Section 2.01.01.E. b. To achieve an adjusted FAR in the SM District pursuant to and Section 2.02.03.F.c. To meet the Alternative Location Criteria for locating the SCN District in the Suburban Neighborhood or Suburban Mixed Use Place Types of the General Plan pursuant to Section 2.02.02.K.1.d. As a permitted adaptive reuse of a building or structure pursuant to Section 5.09.c.	8.02 A. 1. a-d	Consistency with CP	Support for sliding scale for the UHNUS; otherwise it is a disincentive. Concern that UHNU language appears to require 15% ADUs and 15% UHNUS. Also concerned with putting forms of ownership in the ZO. Concerned that we will not get UHNUS moving forward. It will continue to be a proffer and will create more risk in the development process and uncertainty. Need threshold certainty of what the County will expect with regards to UHNUS. Concerned that the goal will not be met with the ZO as it is currently proposed. UHNUS should be required and taken out of the proffer discussion. Important to get density to make it financially feasible.	Recommend looking at what happens when both ADUs and UHNUS are proposed	N/A	N Staff will research and revise if needed
28	4/19/2022	Amend zoning regulations and design standards to incorporate density bonuses and other incentives into appropriate zoning districts to encourage the provision of housing to address the County's unmet housing needs in areas currently served by or planned for mass transit. Chapter 4 Action 1.2 A	To achieve an Adjusted FAR, calculate the UHNUS required by multiplying the applicable UHNU percentage requirement in Section 2.02.01.E, Table 2.02.01-2 or 2.02.03.F, Table 2.02.03-2 by the total number of dwelling units proposed. To meet the Alternative Locational Criteria in Section 2.02.02.L.1:	8.02 D. 1-2	Consistency with CP	There are other things that would incentivize a client than permitting additional FAR. Reduce the capital facilities for market rate units if additional affordable units are provided. Especially those market rate units that are affordable by design. Cost of structured parking and other costs for specifically multi-family product would be helpful to reduce the capital facility costs. Suburban Mixed Use, Urban Transit place types for Multi-family housing. How does this type of incentive get implemented? Need to look at creating new capital facility costs for high rise multi-family units	Recommend other incentives like reduced capital facilities fee and parking incentives instead of Floor Area Ratio	Outside scope of Chapter 8	N
29	4/19/2022	Develop zoning regulations and design standards that remove barriers and incentivize the development of housing affordable to households at or below 100 percent AMI in all residential and mixed-use development. Chapter 4 Action 3.1 C	All UHNUS must be controlled by covenant that is recorded among the land records of Loudoun County, Virginia, runs with the land, in a form approved by the County and in favor of the County or its designee, and controls the sales or rental price for the following periods of time: Rents for rental UHNUS must be controlled for a period of at least 30 years from the date of the issuance of the occupancy permit for each rental UHNU. Sales prices for UHNUS for purchase must be controlled for an initial period of at least 20 years and an extended control period pursuant to the control period for for-sale units included in Section 1450 of the Codified Ordinances.	8.02 H	Clarify regulations	No issues with draft new language.	Use new text for UHNU covenants	N/A	N
30	4/19/2022	Should the current practice of attainable housing units converting to market rate units after 15 years continue?	No language about ADU covenant in ZO	n/a	Address specific issue	Looking to address this in the codified ordinances	Update the codified ordinance once zoning ordinance adopted.	N/A	N

Attainable Housing Subcommittee - Worksheet for Developing Proposed Findings and Recommendations

#	Meeting Date	Comprehensive Plan Policy or Issue (Significant Revisions Only)	Draft ZO Text to Implement Policy or Address Issue	ZO Section	ZOC Bylaw	Subcommittee Finding	Subcommittee Recommendation	Subcommittee Opposing Comment	ZOC to Consider Y=Yes N=No
31	4/19/2022	Do regulations requiring attainable units to be comparable in size with market rate units result in less attainable housing in the long-term?	Approved site plans and subdivision plats must demonstrate that the ADUs are compatible with and interspersed among market rate dwelling units by meeting the following requirements:	8.01 H	Address specific issue	Need to look at size of housing to ensure affordability in the long term beyond the 30 year term. Need to look at this holistically. Nothing in the Urban Transit district purpose that mentions affordable housing	Don't know how we can do anything about size of housing units in Chapter 8. Could be addressed in other parts of the zoning ordinance.	ADUAB looks at housing holistically. This subcommittee is only tasked with the ZO.	N

Appendix 2. Zoning Ordinance Committee Comment Report

The Zoning Ordinance Committee (ZOC) reviewed draft zoning ordinance text between November 2020 and July 2022. This report contains comments that individual members entered in an online interactive platform called enCodePlus throughout their review process. If staff provided a response to a comment in enCodePlus, that response is also included in this report. Responses were not provided to all comments. However, the draft text was discussed by ZOC and staff during ZOC meetings, and all comments from ZOC will be considered and factored into the final Zoning Ordinance. If a staff comment was “noted,” that comment is not included in this report.

ID	Section
#7324	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14K Landscaping Object to such severe limitations on species for planting. What about orchards? My landscape architect favors species such as London Plane Trees and various cypress.
#7969	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7323	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14K SITING This clause is subjective and can't be enforced
#7970	2 Rural Hamlet
By: Kate McConnell Tags: ,staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7322	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com	5.14K1,2&3 Original organization was correct.These should be a, b & c under 2.

ID	Section
Date:1/16/2022	
#7321	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.1414 Is this clause needed? Isn't it a requirement in any case? Clause is not included in other zoning districts or development options. If it was, its uniform, and should only be written once. Isn't it in the LSDO?
#7974	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7320	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.141 Building Area - Need an easier way to revise the designated building area (and thus the open space easement) ministerially instead of going to the BOS
#7975	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7319	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.1413 DRAINFIELDS Clause unnecessary Required in any case Other zones/development options do not include such a clause
#7976	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7318	2 Rural Hamlet
By: Eric Zicht	5.141 HOMEOWNERS ASSOCIATIONS

ID	Section
Tags: zoc zicht@erols.com Date:1/16/2022	Don't require HOA unless there are elements requiring community ownership or maintenance
#7977	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7317	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14H4 Roads Rewrite this section to reflect what we have learned and eliminate need for modifications. - Allow private roads to FSM standard for up to 25 lots. - Drop restatements of VDOT standards (class) that apply in any case for public roads.
#7978	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7316	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14H3 Fire Protection Unnecessary Requirement applies in any case. FSM Other districts/development options don't include this reference
#7979	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7315	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14F2a Health Department Requirements: We don't need this clause. None of the other rural districts or development options contain such a reference to rules that apply in any case
#7980	2 Rural Hamlet

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7314	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14F2 This clause is subjective and can't be administered
#7981	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7313	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14 F1 DENSITY Add a line for AR1 and AR@ densities
#7982	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	Rural hamlets are not listed as a permitted use in AR-1 or AR-2.
#7312	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14D2d2 Open Space Uses Why would an arbotum require a special use permit and not be a by-right use on all the varieties of Open Space?
#7984	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	Memo indicated that some uses still need to be aligned with updated use list.

ID	Section
#7311	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14C1a3 Guest House Is this defined? How different from short term rental or B&B?
#7983	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	Memo indicated that some uses still need to be aligned with updated use list.
#7310	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14E1e Front Yard Allow up to 100-foot setback - Would allow drainfield to be in front yard - More appealing to those moving to a rural area, more privacy.
#7986	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7309	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14D Minimum Tract Size Suggest reducing from 40 to 20 acres in AR1 to promote this option.
#7985	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7308	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com	5.14B Hamlet Defined

ID	Section
Date:1/16/2022	There is no limitation on the number of hamlet groupings or cluster. You could have three groupings of 5 lots, wherein current Cluster would require a single cluster of 15
#7987	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7307	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14G2 The width between hamlets and adjoining trats and between hamlets should be reduced.
#7988	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7306	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14G1 Minimum 85% open space includes most of the area on the smaller hamlet lots.
#7989	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7305	2 Rural Hamlet
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14 C 2 a 4 Active recreation uses permitted in common open space
#7304	2 Rural Hamlet

ID	Section
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.14 RURAL HAMLET As part of the deliberations about Rural Clusters, some have suggested going back to the Hamlet approach. I found the Hamlet regulations to be overly restrictive, and most seemed to require modifications of regulations. Rather than fix these problems, the County chose in 2003 to promote clusters as the favored development pattern. Rather than abandoning Hamlets, how might it be revised to fit AR zones?
#7991	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	Will suggest to cluster ZOAM staff that they consider Rural Hamlet regs.
#8851	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Made suggestion.
#7301	2 Rural Hamlet
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.14.1.3. RURAL HAMLET/HOA. Requiring the County alone to enforce permanent open space easements is not very encouraging given the County's past record of enforcement as documented by, for example, LCPCC. There needs to be a stricter mechanism involving stakeholder groups, including but not limited to representatives of LCPCC, PEC, Loudoun Wildlife Conservancy, and Virginia Outdoors Fund which are committed to open space preservation.
#7990	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.
#7300	2 Rural Hamlet
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.14 RURAL HAMLETS. OPEN SPACE REQUIREMENTS. There's really only one point here -- why does a grandfathered development option provide GREATER protections (@ 85%) for the preservation of rural Loudoun than what is being proposed for new Zoning Ordinance Amendments - ZOAM-2020-0002 (@70%)?
#7993	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov	Will suggest to cluster ZOAM staff that they consider Rural Hamlet regs.

ID	Section
Date:1/26/2022	
#8849	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Made suggestion.
#7299	2 Rural Hamlet
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.14.G. RURAL HAMLET. Open Space Requirement. > 85% of its total land in open space is appropriate. Why is ZOAM-2020-0002 protecting less with only 70% open space?
#7992	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	Will suggest to cluster ZOAM staff that they consider Rural Hamlet regs.
#8850	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Made suggestion.
#7298	2 Rural Hamlet
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.14.D. RURAL HAMLETS. MINIMUM TRACT SIZE. The minimum tract size for this option in AR-1 (ARN) districts was/is 40 acres, and yet the minimum for ZOAM-2020-0002 for similar goals is 20 acres. Why is this minimum not applied to ARN if the County is truly valuing the preservation of western Loudoun for the enjoyment of all residents in the County?
#7994	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	Rural hamlet is not a use listed in AR-1, so development under this option is not permitted.
#7297	2 Rural Hamlet

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	"5.15. RURAL HAMLETS. Why is not more of this development option incorporated in ZOAM-2020-0002 when the goals in line with 2019 Comp Plan are as or more clearly stated with, ""Such clustered development is intended to better harmonize rural development with surrounding agricultural activities recognizing that it is the County's primary goal to preserve and enhance farming and farmland in rural Loudoun by the most feasible, effective, and equitable methods available. This option is intended to conserve agricultural, forestal and open space land, historic and natural features at the time that such land realizes the development potential currently allowed in the agricultural zoning district. Such clustered development is intended to permit the compact grouping of homes located so as to blend with the existing landscape, such as the rise and fall of the topography, hedgerows and wooded areas, and to preserve to a greater extent the agricultural, forestal and visual character of the landscape."" "
#7995	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	Will suggest to cluster ZOAM staff that they consider Rural Hamlet regs.
#8848	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Made suggestion.
#7245	2 Rural Hamlet
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/16/2022	G.2. There should not be a buffer between hamlet lots and adjacent property. This will increase the amount of possibly-productive ag land.
#7996	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The buffer is open space, which could be in agriculture.
#7244	2 Rural Hamlet
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/16/2022	Hamlet lot requirements: These setbacks seem better seem to create a neighborly village feel than do the standards for cluster lots. Suggest using these standards in the cluster sections.

ID	Section
#7998	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	Will suggest to cluster ZOAM staff that they consider Rural Hamlet regs.
#8847	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Made suggestion.
#7243	2 Rural Hamlet
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/16/2022	Hamlets: How many acres of Hamlet-zoned property are there?
#7999	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	To answer this question would require additional research.
#8846	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	This question is not related to implementing the 2019 General Plan. The answer would also not benefit the ZO Rewrite, as these developments already exist and these regulations are being maintained to regulate them.
#7242	2 Rural Hamlet
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/16/2022	Hamlet C.1.a.1 Suggest not allowing 4 (day care) or 9 (antenna) on hamlet lots.
#8000	2 Rural Hamlet
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/26/2022	The Rural Hamlet regulations are being carried over to administer existing rural hamlets and are not proposed for revision.

ID	Section
#6047	1 Rural Commercial – RC
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.04.03 Rural Commercial – RC. In order to "Ensure the locations where limited rural commercial and residential uses are permitted develop consistent with the general open and rural character of the Rural North and Rural South Place Types;" shouldn't there be requirements for open space and building lots siting?
#9364	1 Rural Commercial – RC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/5/2022	This district is retained for sporadic small lots largely in the RPA, but not in a village. There is no open space requirement in the RPA Place Types except for cluster subdivisions. Since this district will not be allowed to expand and existing lots are relatively small, requirements for lot siting is not necessary.
#5891	1 Rural Commercial – RC
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	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?
#9360	1 Rural Commercial – RC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/5/2022	This is a legacy district, we are retaining the regulations for where the district exists, but are not allowing it to expand.
#5718	1 Rural Commercial – RC
By: Maura Walsh-Copeland Tags: zoc 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	1 Rural Commercial – RC
By: Kate McConnell Tags: 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.
#1955	[Table Format] Use Classifications, Categories, and Types

ID	Section
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/6/2021	Restaurant, fast food (with and w/o drive thru): The term fast food is used to define itself, which could be confusing. Would fast food cover both a McDonald's and a Panera (which would not meet the definition of sit-down restaurant)?
#2083	[Table Format] Use Classifications, Categories, and Types
By: Ryan Reed Tags: ryan.reed@loudoun.gov Date:7/6/2021	Thank you for the feedback. We are working on clear definitions for each use.
#1954	[Table Format] Use Classifications, Categories, and Types
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/6/2021	Restaurant, sit down: The definition specifically prohibits drive through, but given the evolution of food delivery with COVID-19, is curb-side pickup impacting operations/parking or is it just treated as carry-out?
#2084	[Table Format] Use Classifications, Categories, and Types
By: Ryan Reed Tags: ryan.reed@loudoun.gov Date:7/6/2021	We will follow up on that further based on staff research.
#1953	[Table Format] Use Classifications, Categories, and Types
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/6/2021	Where does a public school fit within the definitions?
#1950	[Table Format] Use Classifications, Categories, and Types
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/6/2021	Does the removal of water extraction from the table preclude its use for irrigation? Is the commercial use designation based upon volume used or the actual use.
#1948	[Table Format] Use Classifications, Categories, and Types
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/6/2021	(2) Is Civic Space going to be the verbiage used in the place of Open Space on applications? Open space has typically been calculated as anything outside of roads and lots to satisfy zoning requirements, which is not how it is defined within the Civic Space definition. Civic Space can be a subset of an Open Space definition, but not all open space is civic space. Parking areas are allowed as part of a dog park, but what about parking areas adjacent to active recreation

ID	Section
	open space or common open space? It is important that the definition of Open Space and its various components be clarified and that the usages in the General Plan be consistent with how they're applied in the zoning and subdivision ordinances.
#1947	[Table Format] Use Classifications, Categories, and Types
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/6/2021	(1) Under the definition for "Dwelling, single-family attached," it lists "stacked" dwelling units as an option. The current Zoning Ordinance has a definition for multi-family stacked that includes a vertical element to the units. "Stacked" units have not been considered "attached" as the "attached" units were contained within separate lots and owned fee simple. Stacked units reside on the same lot and are not typically owned fee simple. The "stacked" characteristic should remain in the "Dwelling, multi-family" definition. The current zoning ordinance contains a separate definition for "Dwelling, Stacked Multifamily" that clarifies the vertical positioning of units.
#1639	[Table Format] Use Classifications, Categories, and Types
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:6/14/2021	Don't we still need a definition for "farm"?
#1651	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov 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.
#1638	[Table Format] Use Classifications, Categories, and Types
By: Gem Bingol Tags: zoc gbingol@pecva.org 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	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov 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.
#1637	[Table Format] Use Classifications, Categories, and Types

ID	Section
By: Gem Bingol Tags: zoc gbingol@pecva.org 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	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	Good point. We will expand the definitions of fast-food restaurant.
#1636	[Table Format] Use Classifications, Categories, and Types
By: Gem Bingol Tags: zoc gbingol@pecva.org 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	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	Fixed.
#1635	[Table Format] Use Classifications, Categories, and Types
By: Gem Bingol Tags: zoc gbingol@pecva.org 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	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	Yes. Fixed.
#1634	[Table Format] Use Classifications, Categories, and Types
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:6/14/2021	SEE ADDITIONAL COMMENTS posted in Section 3.01, Explanation of Use Table Structure

ID	Section
#1633	[Table Format] Use Classifications, Categories, and Types
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:6/14/2021	Table 3.03-1 Definitions. What is or will be the definition of "FARM?"
#1666	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov 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	[Table Format] Use Classifications, Categories, and Types
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	Agreed.
#1631	[Table Format] Use Classifications, Categories, and Types
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:6/14/2021	Table 3.03-1 Definitions. CULTURAL TOURISM. Still have the typo "natual" instead of "natural"
#1668	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	Fixed
#1629	[Table Format] Use Classifications, Categories, and Types
By: Gem Bingol Tags: zoc	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?

ID	Section
gbingol@pecva.org Date:6/14/2021	
#1656	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov 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	[Table Format] Use Classifications, Categories, and Types
By: Gem Bingol Tags: zoc gbingol@pecva.org 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	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	Will consider as we refine use specific standards in Section 3.06.
#1612	[Table Format] Use Classifications, Categories, and Types
By: Gem Bingol Tags: zoc gbingol@pecva.org 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	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov 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.
#1611	[Table Format] Use Classifications, Categories, and Types
By: Gem Bingol Tags: zoc gbingol@pecva.org 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	[Table Format] Use Classifications, Categories, and Types

ID	Section
By: James David Tags: staff james.david@loudoun.gov 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.
#1521	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/13/2021	AGRICULTURE - LIMITED DISTILLERY 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com 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	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/13/2021	AGRICULTURE - PET FARM 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/14/2021	Suggest excluding the breeding of a set number of domestic pets from the definition.
#1519	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com 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.

ID	Section
#1518	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com 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	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/13/2021	PERSONAL/BUSINESS SERVICES Why aren't the broad definitions of personal and business services sufficient?
#1577	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com 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	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/13/2021	DRY CLEANING PLANT Seems more industrial/manufacturing than personal/business services
#1578	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff 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.

ID	Section
#1515	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/13/2021	FARM MACHINERY Should this be under professional and business services? Seems to be the wrong category
#1579	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff 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	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff 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.
#1513	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/13/2021	RESTAURANTS Recommend diagram showing different types of restaurants. Many overlap.
#1581	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/14/2021	Good point. This lends itself to a graphic or table. We will develop as we move forward.
#1512	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/13/2021	FOOD PREPARATION 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?

ID	Section
#1582	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com 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	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/13/2021	FARM MARKET (on-site) Use parallel construction for the two forms of farm markets
#1583	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com 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	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/13/2021	VEHICLE REPAIR - LIGHT & HEAVY 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com 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	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com 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.
#1585	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com 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.

ID	Section
#1504	[Table Format] Use Classifications, Categories, and Types
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/14/2021	Noted - will work on different scales of Wood, Metal, and Stone Crafts.
#1501	[Table Format] Use Classifications, Categories, and Types
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/14/2021	Noted for future discussion.
#1489	[Table Format] Use Classifications, Categories, and Types
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com 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.
#1483	[Table Format] Use Classifications, Categories, and Types

ID	Section
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/14/2021	Noted for discussion.
#1480	[Table Format] Use Classifications, Categories, and Types
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com 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.
#1379	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com	Yes - size limits are common to accessory dwelling regulations. The supplemental regulations can also regulate density. Most accessory dwelling

ID	Section
Date:6/1/2021	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	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com 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	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	The would be addressed in regulations for adaptive reuse of existing structures, and the historic district overlays.
#1377	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/1/2021	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.) 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.) 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? 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.
#1389	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	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."
#1370	[Table Format] Use Classifications, Categories, and Types

ID	Section
By: John Merrithew Tags: zoc Date:6/1/2021	Do we need a marina definition?
#1393	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	"Marina" is defined in draft Section 3.03 - Version 2
#1369	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc Date:6/1/2021	Where doe JK Moving fit if not under warehousing and storage?
#1394	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	First take is yes. However, staff would have to evaluate the nature of the business to officially classify it.
#1368	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc Date:6/1/2021	Will Pneumatic guns be regulated the same as shooting ranges? They typically are used in an arena setting where people shoot at each other.
#1591	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	As currently written, the pneumatic guns facilities are regulated the same as shooting ranges. What is described here could be culled out and classified as an indoor or outdoor/major recreation use.
#1367	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc Date:6/1/2021	Civic space seems out of place in the entertainment section. Should be under civic.
#1396	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff	"Arts, Entertainment and Recreation" is a subheading. Civic Space is under primary heading "Public/Civic/Institutional."

ID	Section
james.david@loudoun.gov Date:6/1/2021	
#1366	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc Date:6/1/2021	Medical care facilities don't have to be licensed? Would that make massage parlors medical care facilities?
#1592	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	I would think that massage parlors would qualify as a medical care facility. This is the current definition - does staff have any background on that?
#1365	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc Date:6/1/2021	Rural retreat an educational facility. Seems more like a convention or exhibit facility? Why is a convention center a civic use when they are more like a commercial use?
#1593	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	Rural retreat is classified as educational because of their research-oriented nature. Does staff have any examples of those? Conventional centers are gathering places for a variety of events are not usually classified as "commercial."
#1364	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc Date:6/1/2021	Why is mobile vendor in the Food and Beverage category? Now that restaurants are offering all types of service, eat-in, take-out, delivery..do we need to make the distinctions? I understand separating drive-thru facilities but otherwise, a restaurant is a restaurant.
#1594	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	Noted for discussion.
#1363	[Table Format] Use Classifications, Categories, and Types

ID	Section
By: John Merrithew Tags: zoc Date:6/1/2021	Why is a distillery a craft beverage manufacturer? Seems to be a vague description that could apply to soda manufacturers. Why not limited distillery, which seems have a nice parallel with limited brewery and farm winery.
#1595	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	The "Craft Beverage Manufacturing" definition is similar to the current one, but may need another look as the statute was recently revised. These are different from limited distillers, which are considered agricultural and have protections from some zoning regulations per Code of Virginia § 15.2-2288.3:2.
#1362	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc Date:6/1/2021	Alternative lending institution can offer services online but a bank can't offer loans online? Banks also have a storefront. I think banks and financial institutions are much the same use and do not need to be distinct uses. Again, forward thinking suggests the financial businesses are becoming less distinct.
#1397	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Good point. Will propose collapsing "Alternative lending institution" with "Bank or financial institution" in next version of Use Tables.
#1361	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc Date:6/1/2021	Vehicular definitions seem dated and overly complicated. Generally the definitions should stop at the first sentence rather than trying to describe every activity that could possibly be associated with the primary use. For example a car wash is a commercial washing of motor vehicles period. The rest of the definition tries to address every circumstance, thereby making it less accommodating of new technologies and market changes. There is no forward thinking about charging stations, needs of cars with no spark plugs or oil, etc. Definitions seem to be lessening the ability to respond to new issues and concepts. The definitions could relate more to each other. A service station can be illustrated as something less than light vehicle repair, which itself is something less than heavy vehicle repair. Maybe illustrations could help.
#1596	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	The examples listed in the definitions are simply designed to clarify where certain things fit, and do not limit the thing defined to those examples.

ID	Section
#1360	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc Date:6/1/2021	Can manufactured homes be mobile homes? Since we still have mobile home parks? Seems like an unusual distinction.
#1398	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	"Mobile home" deleted.
#1359	[Table Format] Use Classifications, Categories, and Types
By: John. Merrithew Tags: zoc Date:6/1/2021	Live/work dwelling. Definition gets a little aspirational. Isn't the distinction that a live/work home has a commercial space and storefront and can accept retail customers where a home occupation has no commercial space and cannot accept customers?
#1597	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/14/2021	That's a great explanation - will work on simplifying and clarifying the difference between live-work and home occupation. A home occupation does not change the character of the living unit, while a live work unit has a different and more permanent site configuration - for example, a storefront.
#1358	[Table Format] Use Classifications, Categories, and Types
By: John. Merrithew Tags: zoc Date:6/1/2021	Thanks for the email fix!
#1357	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc Date:6/1/2021	Why do we need to specify caretaker units when. They are the same as an accessory in it?
#1598	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	Caretaker is specific to the business - i.e., its a unit that is there specifically related to the business. Otherwise, they are just living units in the same structure as a commercial business - such as a apartments over storefronts (as in the mixed use category that was removed).

ID	Section
#1353	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/31/2021	303.3-1 DEFINITIONS: Guest House - If non-commercial (non-paying) why is this use included in this category? Why is it regulated at all? Isn't just one use of an accessory dwelling?
#1390	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/1/2021	See earlier comments, but this would allow someone to have an additional accessory structure if it meets this definition. If guest houses and accessory dwellings are all allowed in the same districts and in the same category, this is another consideration for merging those uses.
#1351	[Table Format] Use Classifications, Categories, and Types
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.03-1 Definitions. RECREATION, INDOOR still contains (has not changed) inclusion of firearm shooting, even though there is a separate definition for Shooting range, Indoor. Perhaps this will be clarified by a subsequent ZOAM (?).
#1427	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Good catch, Will remove "firearm shooting" from Recreation, Indoor definition.
#1350	[Table Format] Use Classifications, Categories, and Types
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.03-1 Definitions. BED & BREAKFAST INN. Use protections have been made more consistent in this draft for policy areas/place types with proposed designations. However, this Use requires separation, additional standards for "events" on site. Applications for B&B Inn are being used to establish an Event Center "by-right" to circumvent Banquet Event Facility use requirements. Establishments are not being used as B&B, rather are primarily being used for events without regard to size requirements. See case study evidence: Page 22: https://loudouncoalition.org/wp-content/uploads/2020/04/ATTACHMENT-RuralUses-Chronologies.pdf
#1599	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	Noted - thanks for the reference!

ID	Section
#1323	[Table Format] Use Classifications, Categories, and Types
By: Eric zicht Tags: zoc zicht@erols.com Date:5/30/2021	TABLE 303.3-1 DEFINITIONS: Restaurant, Fast Food - What if my restaurant is slow food carry-out? Also, what about restaurants that do both carry-out and eat-in? Is that two uses? Or one principal with an accessory. Everyone has a carry-out option these days.
#1391	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/1/2021	The definition simply attempts to describe and distinguish the features of fast food and other types of restaurant uses. We can address how the accessory uses work in greater detail in sec. 3.04.
#1322	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/30/2021	TABLE 303.3-1 DEFINITIONS: Farm Market - ALL grown or processed onsite, or just 50%? Farm Market (Off-Site Production) - How is this different from a grocery store? Food preparation: How is this different from a carry-out restaurant? Food Store - Is this just a grocery store? Why distinct from plain retail?
#1392	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	Farm market - minimum of 25% of the products offered for sale must be derived directly from agricultural, horticultural, aquacultural, or animal husbandry products produced on site or on other property in Loudoun County owned or leased by the operator of the Farm Market. Will be addressed in Use Specific Standards section reviewed later by ZOC. Farm market (off-site production) - minimum of twenty five percent (25%) of the products offered for sale at the Farm Market (off-site production) must be produced in Loudoun County. Will be addressed in Use Specific Standards section reviewed later by ZOC. Food preparation is similar to carry out, but caters less to immediate consumption by the consumer. A Food Store is a broad category that includes groceries. The distinction allows these uses to apply in locations that are neighborhood-serving, as opposed to a broader retail use with a more community or retail market.
#1321	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/30/2021	TABLE 303.3-1 DEFINITIONS: Alternative Lending: Why is this a separate use? Stockbrokers, Accountants & Financial Advisors - Are these financial services, or just another office use? Suggestion: What differentiates banks appears to be the drive-ins. Otherwise, they seem to be a normal office use.
#1395	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff	Alternative lending tends to have higher interest rates and characteristics that some many consider to have adverse impacts on neighborhoods.

ID	Section
mwhite@planningandlaw.com Date:6/1/2021	Stockbrokers, Accountants & Financial Advisors - where are those listed as a separate use?
#1320	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/30/2021	TABLE 303.3-1 DEFINITIONS: Animal Services - I think boarding horses and farm animals is very different than boarding dogs. Kennels are normally a land use, differentiated by indoor or outdoor.
#1399	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	Animal services - horses / farm animals fall under animal care business (we may need to be more explicit about horses). Noted for discussion as to indoor v. outdoor for kennels.
#1319	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/30/2021	TABLE 303.3-1 DEFINITIONS: Animal care Business: Many of these businesses have no fixed address, are mobile and visit their clients.
#1400	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	Note as to animal care business with no fixed site - perhaps we revise the definition to cover only onsite facilities.
#1318	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/30/2021	TABLE 303.3-1 DEFINITIONS Water Extraction: Where did this come from? Is the intent just to ban such uses? What about breweries?
#1401	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	There is concern about the impact of water extraction uses on wells and, from other comments, there is some sentiment to either ban or strictly control them. These do not include breweries.

ID	Section
#1317	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/30/2021	Table 3.03-1 Definitions: Rooming & Boarding - This is not the conventional way of handling this in Virginia and by Virginia law. The normal way is to specify the number of unrelated persons that can occupy a house.
#1402	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	Will look into rooming and boarding as a separate use (as opposed to just having a limit on unrelateds). It's customary for zoning regulations to list these as separate uses.
#1316	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/30/2021	Table 3.03-1 Definitions: TENANT DWELLING - Definition needs work. Not all tenant workers are seasonal - some year-round. Are family members to be excluded?
#1403	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	Tenant dwellings include seasonal uses but are not limited to them. Family members are not excluded, but the nature of this use is typically to provide housing for workers outside of the immediate family.
#1315	[Table Format] Use Classifications, Categories, and Types
By: Eric zicht Tags: zoc zicht@erols.com Date:5/30/2021	Table 3.03-1 Definitions: Religious Housing: I object to this category - its is prejudicial and calls out religious uses as somehow different. Allow an accessory residential use for places of worship.
#1405	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	The intent of this is to accommodate all forms of religious housing - not to single it out. The ZO currently has a use category for things like convents, but this clarifies that it applies to housing for all religions (which I believe is the intent of the current definition).
#1314	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc	Table 3.03-1 Definitions:

ID	Section
zicht@erols.com Date:5/30/2021	Live/Work Dwelling - I don't see a need for this.If included, it should be permitted in RC districts.
#1313	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/30/2021	Table 3.03-1 Definitions: Accessory Dwelling: Where will the size requirements or other criteria that make this use accessory (rather than a second principal use) be found?
#1407	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	3.04 / 3.06.
#1312	[Table Format] Use Classifications, Categories, and Types
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/30/2021	3.03-1 Table: Where is co-housing in the definitions? It is a permitted use in several current zones, and there is at least one pending application. Have you notified this applicant? It does not seem fair to drop this use, hidden within a massive rezoning process, without notifying a known interested party.
#1408	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/1/2021	This was removed as a use because it relates to how housing is operated or owned. Nonconformities and vesting is addressed later in the process. It's also very unusual to personally notify pending applicants of specific changes in a comprehensive zoning rewrite, but the County can do this if it chooses.
#1311	[Table Format] Use Classifications, Categories, and Types
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/27/2021	Is a Wayside Stand considered to be a principal use, or an accessory use, or can it be either? The definition does not seem to be clear. In other words, is it always associated with a farm? If it is always associated with a farm, should it be removed from the Use Tables and addressed in the accessory use section?
#1404	[Table Format] Use Classifications, Categories, and Types
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Wayside stands can be a principal use.
#839	[Table Format] Use Classifications, Categories, and Types

ID	Section
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:5/5/2021	Is a cluster and hamlet a use?
#825	[Table Format] Use Classifications, Categories, and Types
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Since we have bars calling themselves limited breweries we already know this is a problem. Can we add any amount of product grown on site restrictions as a county or does Dillon limit us? These facilities do a lot to sour rural community/suburban neighbor relations in the RPA. Noise from these facilities is a major issue as well.
#1261	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	Address in 3.06.
#815	[Table Format] Use Classifications, Categories, and Types
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Banquet/Event Facility must be sized appropriately to the parcel and region in question taking into account the surrounding roads, and maximum available parking. These are inappropriate in a neighborhood and only create animosity within the community.
#1262	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	Address in 3.06.
#805	[Table Format] Use Classifications, Categories, and Types
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/5/2021	Is there a "Laboratory" use?
#1263	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff	Research and development (language added to clarify).

ID	Section
mwhite@planningandlaw.com Date:5/25/2021	
#804	[Table Format] Use Classifications, Categories, and Types
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/5/2021	Manufacturing, General definition seems like it needs an edit.
#803	[Table Format] Use Classifications, Categories, and Types
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/5/2021	Does the Animal Services use always have to be supervised by a licensed veterinarian? Are all kennels?
#1264	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/25/2021	3.06 can address where licensed vets are required.
#802	[Table Format] Use Classifications, Categories, and Types
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/5/2021	I might say that religious housing (monestary, convent) should be under Group Housing, not Household Living, however, a rectory would be Household Living.
#799	[Table Format] Use Classifications, Categories, and Types
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:5/5/2021	Mobile Home: The definition might work for a 3-D constructed home, but the name "mobile home" wouldn't be appropriate to describe that type of construction.
#798	[Table Format] Use Classifications, Categories, and Types
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:5/5/2021	The news includes information about a new kind of manufactured housing that is 3-D printed. Would the definition, as it stands, allow for that type of unit, or should there be another category to consider that type of construction?

ID	Section
#1265	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/25/2021	At this point, it would have to comply with the building code so it would just fall under the definition of single-family detached, single-family attached, or multifamily.
#793	[Table Format] Use Classifications, Categories, and Types
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/4/2021	<p>AGRICULTURE. (Definition). How will standards differ between Suburban Place Types (SCN, SM, SC, SE, SI, SAR) to differentiate Use as applied in other areas (e.g., Rural North, Rural South on a “farm”)? AGRITAINMENT. Definition states use is “in conjunction with ag support and services . . . associated with on-going ag activity . . . ,” but has been used by multiple other Uses as justification for events and fundraisers (eg. Limited Breweries, Farm Wineries, Farm tourism). Performance standards must include better identification of scale, traffic, setbacks, etc. to ensure consistent protections and ability for enforcement.</p> <p>"BANQUET/EVENT FACILITY – Use is INCONSISTENT in designation and scale/size of use for residential areas throughout Policy Areas.</p> <p>-- Permitted: Rural Commercial, Village Commercial, UPA, SM(SPA Mixed use), SPA Employment</p> <p>-- Modified SPEX: RN, RS, RV, VAR, SAR, TLN-10, TLN-3-- SPEX: VR (Village Residential), Suburban Residential 1 (SR-1), JLMA-3</p> <p>-- Definition also allows use as “ancillary component of other uses, such as, but not limited to . . . Rural Resorts . . . and similar uses.” Actual expansion of event facilities has been to wineries and Limited Breweries, which are not “similar uses.”</p> <p>ALL Agricultural and Residential locations: in TPA, JLMA and RPA should equally be SPEX to mitigate current loopholes, abuse and zoning enforcement issues. LCPCC Zoning Audit and case studies have shown these facilities produce major impacts in residential areas, therefore, Modified special exception is insufficient.</p> <p>At a minimum Use should be a full SPEX for applications that exceed XXX attendees (200?) Y times per year with enforcement if applications and actual use are shown to be exceeding performance standards.</p> <p>https://loudouncoalition.org/wp-content/uploads/2020/04/RuralZoningComparison-3-15-2017.pdf</p> <p>"BED & BREAKFAST INN. Use protections are INCONSISTENT in policy areas/place types with proposed designations:</p> <p>-- TPA: Permitted in TLN-10, TLN-3, TLN-1, TSN, and Modified SPEX in JLMA-1, -2 & -3.</p> <p>-- RPA: Permitted in RN, RS, RC, RV, VC, VAR, but Modified SPEX in Village Residential (VR).</p> <p>Use requires separation, additional standards for “events” on site or Modified designation in all areas to be CONSISTENT. Applications for B&B Inn are being used to establish an Event Center “by-right” to circumvent Banquet Event Facility use requirements. Establishments are not being used as B&B, rather are primarily being used for events without regard to size requirements.</p> <p>See case study evidence: Barn at Willow Brook, Page 22: https://loudouncoalition.org/wp-content/uploads/2020/04/ATTACHMENT-RuralUses-Chronologies.pdf</p>

ID	Section
	<p>"BOTTLED WATER (ONSITE). -- This use is NOT referenced in the current zoning ordinance. -- Use has no indicated P, M or S in UPA/SPA, TPA, JLMA. -- Performance standards, capacity constraints, and required application information must be COORDINATED between Health Dept./ODW, Planning & Zoning, Building & Development, and must include Overlay District additional restrictions or prohibitions. -- How will this be addressed?"</p> <p>"BREWERY, LIMITED -- ALL Agricultural/Residential locations: SAR, RN, RS: -- Definition stating "farm shall be defined as one or more contiguous parcels of land . . . 10 acres owned or leased . . ." is insufficient to meet Code of Virginia parameters, and conflicts with definition used by other Virginia counties. -- Definition must be revised to define requirement to match Code of VA "on a FARM in the Commonwealth zoned agricultural." FARM definition should comply with USDA definition: "Any place from which \$1000 of agricultural products* were produced and sold during a given year." * Products defined as "crops or head of various livestock species." CROPS requirement does not include "manufacturing" of beverage(s). -- In the alternative, should apply same/similar requirements for Land Use and Ag District of 5 acres of crop minimum, as is done in other Virginia counties to avoid abuse of brewery/pub/bar in residential areas with no "farm" component as required by Code of VA. -- INCONSISTENT Definition with Craft Beverage Manufacturing stated requirement of "no more than 15,000 barrels of beer per calendar year licensed . . . Sec. 4.1-208 of Code of VA." Limited Brewery has the same requirement, but it is not listed in the Limited Brewery definition. -- IF change of definition is not tied to new/revised definition of "FARM," then Use should be consistent with Agricultural Processing with requirement that "At least 51% of the ag products used for processing, preparation &/or manufacturing shall be derived from the ag use." This would (finally) make brewery and winery use more consistent! "</p> <p>CAMPGROUND (Definition): Typo: include for "include." As other ZOC members have pointed out, permitted locations should be reviewed for consistency throughout similar Place Types.</p> <p>COMMUNITY GARDEN vs. COMMUNITY SUPPORTED AGRICULTURE. (Definitions & use). What's the difference between these two uses? Why are they allowed in UPA, but not SPA, TPA, and RPA? Seems inconsistent with other Use definitions for Agriculture and "Farm."</p> <p>DATA CENTER (Definition). Why are the words "establishment engaged in" underlined?</p> <p>"FARM. (Definition). This term is used as the NAME and or in the Definition of many uses including but not limited to: Agriculture, Brewery Limited, Virginia Farm Winery, Farm market, Farm market (off-site production), Farm co-ops, Pet Farm, Guest farm or ranch, accessory farm building, Farm based tourism, demonstration farm, Farm distribution hub, Wayside stand (farm), cultural tourism. -- The lack of a clear definition of what a "FARM" really is or is not in Loudoun County has caused inconsistent determinations for uses, abuse from applicants, and confusion for residents throughout the county. With the ever-diminishing actual "farm" and "farmland" throughout the County, a definition must be determined if the Rural Policy Area and Rural Tourism are to be protected as stated in the 2019 Comprehensive Plan. "</p> <p>FLEX BUILDINGS (Definition). The definition includes the use of Data Centers, which appear as Permitted (e.g. SE) or SPEX (e.g., UE, SM) uses in the use</p>

ID	Section
	<p>tables in places OTHER THAN those permitted for the USE Data Center. This will likely cause confusion and be deemed “disingenuous” if Data Centers are “buried” as a use within a use.</p> <p>MANUFACTURED HOUSING (Definition): What do “eight BODY feet” and “forty BODY feet” equate to?</p> <p>MOBILE VENDOR. (Definition & Use). Use is Permitted in 4 UPA Places, no TPA, JLMA or RPA Places. In reality, if these are "Food Trucks" they are currently used anywhere there is a Brewery, Distillery or Winery. Need to revise for CONSISTENCY throughout the County. This use must also be review and described to differentiate from a "Restaurant," as many "Mobile" food trucks are remaining permanently on-sites to get around the "Restaurant" requirements.</p> <p>"RESTAURANT. Definition and Use. In the prior Rural Uses III ZOAM (circa 2017-2019) there was discussion to modify/merge ""Farm Restaurant"" as a separate use. Where is this now? As indicated with ""Mobile Vendor,"" many locations are using food trucks to bypass restaurant requirements.</p> <p>In the same manor -- Health Dept. and VDACS requirements for food preparation inside ""tasting rooms"" has expanded to the point of ""restaurant,"" without Health Dept. oversight, (health, safety and welfare impacts to patrons). "</p> <p>"RURAL HAMLET. Current zoning ordinance lists Rural Hamlet Option (Sec. 5-702) as “an alternative to conventional A-3 and A-10 districts subdivision in rural areas.” ZOR Use tables show:</p> <ul style="list-style-type: none"> -- Permitted in Suburban Agricultural/Residential (SAR), Rural North , and Village Ag/Residential, but this referencing existing Rural Hamlets, or will allow NEW Hamlets? -- Why is there No listing for TPA/JLMA, Rural South where there are some vacant A-3 parcels? -- Does this use only apply to grandfathered Hamlets, or can the use be applied in new Place Types?" <p>SMALL BUSINESS (Definition): The definition includes reference to “an establishment conducted in a private residence” as well as “business vehicles.” Performance standards must include how residences and HOAs can manage parking of business vehicles in residential areas.</p> <p>"SOLAR FACILITY, SITE-SPECIFIC. Glad to see this is Permitted. Key will be performance standards to match new use.</p> <ul style="list-style-type: none"> -- Definition: What was the rationale for selecting “capacity not less than 50 kilowatts?” -- Definition: Is “Solar energy system” synonymous to “solar array” and/or “Utility-scale Solar Photovoltaic?” If so, these are more common terms used. In alternative, add the latter term for further explanation." <p>STOCKPILING: SPEX designation in Rural North and Rural South is appropriate, and must include notice to adjacent property owners. After all the issues surrounding Gable Farm, the definition may need to be beefed up to be more clear what it does and does not include. Additional definitions needed for terms: “excessive fill”, “fill”, “dirt”, “construction debris” and “commercial”.</p> <p>"WATER EXTRACTION. Use is NOT referenced in current zoning ordinance.</p> <ul style="list-style-type: none"> -- Identified as SPEX use in SPA Industrial (SI), TIE, JLMA-LE and JLMA-LI, and (shockingly) Rural North & Rural South. -- “Extraction of water from . . . well for commercial use OFFSITE” should never be allowed in any area served by residential wells without some confirmation of impact to adjacent water wells that supply their only source of household water. <p>Performance standards and required application information:</p> <ul style="list-style-type: none"> -- must be COORDINATED between Health Dept./ODW, Planning & Zoning, Building & Development, and

ID	Section
	<p>-- must include Overlay District additional restrictions or prohibitions. How will this be addressed? Case study evidence: Current departmental miscommunication (i.e., Zoning permit "not required"), resulting in approval of 5 commercial/industrial wells "not for human consumption" in Limestone Overlay District now promoted for use for water extraction, wedding/corporate event facility. https://loudouncoalition.org/wp-content/uploads/2020/04/Water-Extraction-Operation-Zoning-Chronology-BCM-4.8.2021.pdf</p>
#1600	[Table Format] Use Classifications, Categories, and Types
<p>By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021</p>	<p>Standards to differentiate Suburban districts will be addressed in 3.06. Will address performance standards for limited breweries and farm wineries in 3.06 with reasonable performance standards per Code of Virginia § 15.2-2288.3 and 15.2-2288.3:1. Standards for Banquet/Event Facility to be addressed in 3.06. Reclassify all Banquet/Event Facility in TPA, JLMA and RPA as S? It appears that this was removed as a use in JLMA-3. Standards for B&B to be addressed in 3.06. Bottled water is eliminated as a use per discussions with ZOC. 10-acre size for limited brewery eliminated, 3.06 to address standards. Will revisit definitions of farm, craft beverage manufacturing and limited brewery based on recent changes to state law and connections to farm use. Campground comments noted for discussion. Community supported agriculture (CSA) limits the use to shareholders, while a community garden is typically a smaller tract open to use by a designated group such as members of an HOA. A CSA could operate a large farm, and some operate community gardens. These are very similar – should we collapse all of them into the "agriculture" use (which CSA is part of now), or both of these into a "civic agriculture" use? Or, we could remove CSA from the use definitions, and simply define it in Chapter 10 and clarify that it no impact on whether a use is "agriculture" or a "community garden." Some communities want these culled out as separate uses. "Establishment engaged in" underlined in Data Center was a typo. We could define "farm" or cross-reference "agriculture." The draft definition of "flex buildings" does not include data centers. Manufactured housing typos have been cleaned up. Mobile Vendors are still under review. There is no definition of "farm restaurant" in the current Zoning Ordinance and that is not addressed as a separate use. How would you define that, and should it be a separate use? Rural Hamlet is deleted as a separate use. The definition of "small business" is revised, with standards to be addressed in 3.06. The "solar facility, site-specific" definitions are based on the Code of Virginia. Water extraction is removed as a separate use per discussion with ZOC.</p>
#783	[Table Format] Use Classifications, Categories, and Types
<p>By: Gem Bingol Tags: zoc</p>	<p>Cluster Subdivision definition has a couple typos in it:</p>

ID	Section
<p>gbingol@pecva.org Date:5/4/2021</p>	<p>...groupings that allow closer spacing THAN is possible under baseline zoning district requirements, which is compensated FOR by maintenance of equivalent open space...</p> <p>I would also suggest that the following part of the same sentence should be edited: ...(DELETE either) elsewhere on RURAL ECONOMY LOTS AND in the form of common open space. NOTE: I suggest not "either" but "and" because both are needed for different reasons.</p>
#761	[Table Format] Use Classifications, Categories, and Types
<p>By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/3/2021</p>	<p>I am hoping that "Death Care Services" is a placeholder name. There must be a more appropriate name for these uses: "Funeral/Mortuary/Burial services"? Is there a need to separate funeral homes from Mortuary services?</p>
#1601	[Table Format] Use Classifications, Categories, and Types
<p>By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021</p>	<p>I don't see a problem with "Funeral/Mortuary/Burial services" rather than "death care" (an industry term) or putting these under personal/business services. Why do we need to separate funeral and mortuary services?</p>
#757	[Table Format] Use Classifications, Categories, and Types
<p>By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:5/3/2021</p>	<p>I don't think of Cultural Tourism and Cluster Development to be Uses. Not to say they don't need definition and regulation, they just are not uses.</p>
#1266	[Table Format] Use Classifications, Categories, and Types
<p>By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021</p>	<p>Cluster is eliminated; cultural tourism currently recognized.</p>
#754	[Table Format] Use Classifications, Categories, and Types
<p>By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:5/3/2021</p>	<p>Where will the use definitions be ultimately housed? I hope in the definitions chapter with all the other definitions and not grow into a separate definition home.</p>
#1602	[Table Format] Use Classifications, Categories, and Types

ID	Section
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	Noted for discussion. The outline has them here. Many codes place them with the definitions, or in a separate set of definitions for the uses.
#753	[Table Format] Use Classifications, Categories, and Types
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:5/3/2021	There are cases where there are uses defined within another use. This is not intuitive that I would need to look up Civic Space to find the definition of Wetlands Mitigation Bank.
#1603	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	This was a result of combining similar uses. We can work on indexing things like that. 3.04 will also address accessory uses.
#750	[Table Format] Use Classifications, Categories, and Types
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:5/3/2021	If not already in process, suggest hyperlinks to relevant information across all columns (LBCS-F/LBCS-S/NAICS/Use Specific Standard) in table 3.03-1.
#1606	[Table Format] Use Classifications, Categories, and Types
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	We can insert hyperlinks to the LBCS/NAICS.
#732	[Table Format] Use Classifications, Categories, and Types
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:5/3/2021	My thoughts and suggestions: Merge caretaker/guard and tenant - definitions similar, purpose is the same Cluster development is not a use it is a subdivision of permitted uses - remove. Same thought with hamlet. Is the difference between a home occupation and a live/work unit the design and customer traffic? Manufactured housing seems to be similar to mobile homes. Modular homes and manufactured housing if it is not a mobile home should be defined as SFD. Very affordable. Religious housing is a religious facility merge definitions. Definition of B&B and Homestays should mention the type of food service.

ID	Section
	<p>Guest house (and numerous) definitions include performance standards. Standards should be removed.</p> <p>Animal services and hospital can be merged and distinguished by large and small animals possibly.</p> <p>Suggest merging banks and alternative lenders. Many banks have drive through services - not sure what drive in services are?</p> <p>Make sure farm markets include sale of meat, eggs, milk, ice cream (the good stuff)</p> <p>Fast food restaurants without drive through service seem redundant to sit down or carry out restaurants. Carry out should be normal part of restaurant without limits on scale.</p> <p>Mixed use building - suggest not defining the uses in each building except in each zoning district where the use is permitted. Seems the mix of uses permitted in each district determines the mixed use building occupants.</p> <p>Small business seems to allow pretty large construction companies. Is there a way of limiting size without referring to vehicular GVW?</p> <p>We have dry cleaning plants that process all clothing and distribute to other outlets. Suggest not limiting the type of clothing processed.</p> <p>Suggest eliminating "convenience stores without gas pumps". Don't see too many without gas pumps and electrical charging stations. Will we define charging stations like gas pump?</p> <p>General retail definition should say what is excluded and not what is included.</p> <p>Combine vocational and business schools</p> <p>Art studios should allow classes.</p> <p>Not sure an urban deck is necessarily a civic space.</p> <p>I don't think cultural tourism is a specific use. Perhaps a category of uses.</p> <p>Dinner theater could be allowed and defined as a restaurant.</p> <p>Merge health and fitness with indoor recreation.</p> <p>Merge bottled water with extractive industries.</p> <p>Remove standards from flex industry definition.</p> <p>Merge Light manufacturing with wood, metal, stone craft.</p> <p>Merge oil and gas storage with energy storage.</p> <p>Do we have or need marinas?</p> <p>Under minor utilities, we deal with different substations differently. How does that change if we merge definition? Same concern with telecommunication facilities.</p> <p>Transmission lines appear in two definitions. OK if we are separating 240 Kv from 500 Kv.</p> <p>Testing station- do we have more than one? Suggest classifying as something else.</p> <p>Does the ordinance have to regulate community gardens or community - supported agriculture?</p> <p>Horticulture is an industry and not a specific use suggest deleting.</p>
#1605	[Table Format] Use Classifications, Categories, and Types
<p>By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021</p>	<p>Caretaker/guard are merged. Tenant dwellings could remain separate, or collapsed and addressed through density or supplemental regulations in 3.06.</p> <p>Cluster development and rural hamlet are removed as uses.</p> <p>Yes – design and customer traffic are the differences between a home occupation and a live/work unit.</p> <p>Mobile, manufactured and modular homes are all factory-built, but are different products. Manufactured homes are built to a federal building code (the "HUD</p>

ID	Section
	<p>Code"), as opposed to "mobile homes" which predate the HUD Code. Modular homes are built to the applicable building code.</p> <p>Merger of religious housing and religious land use noted for discussion.</p> <p>How would the food service differ for bed and breakfast homestays and bed and breakfast inns? Has this been an issue in prior zoning cases, applications or interpretations?</p> <p>Guest house removed.</p> <p>Merger of veterinary service and animal hospital noted for discussion.</p> <p>Alternative lenders often occur in storefront or traditional retail configurations, and have characteristics that some communities have associated with adverse impacts on surrounding neighborhoods. Drive-in is changed to drive-through.</p> <p>Merger of sit-down restaurant and fast-food restaurant excluding drive-through facilities noted for discussion.</p> <p>Mixed use building deleted as a use.</p> <p>The "small business" category is substantially modified to include a more general category for agricultural and rural.</p> <p>Agreed – the name belies the narrow definition of industrial launderers, which is an industry category that caters to a particular type of clothing and equipment. I suggest expanding to include dry cleaning plants as well, as the name suggests.</p> <p>Convenience stores are common to storefronts in main street locations envisioned in some of the placetypes. EV stations are added to the gas pump category.</p> <p>As with any of the categories, especially broadly worded ones such as general retail and personal services. In addition, this does exclude some uses that might otherwise qualify as general retail, such as lumber yards.</p> <p>Combining business / technical school and vocational schools noted for discussion.</p> <p>The allowance of ongoing classes in art studies is noted for discussion.</p> <p>The exclusion of urban decks (that do not otherwise qualify) from civic space is noted. A listing of civic space types to include in 3.06 is underway.</p> <p>Cultural tourism does include several specific sub-categories. Does staff have any examples of existing cultural tourism uses in the County?</p> <p>Combining dinner theatre and restaurant (sit down) is noted for discussion.</p> <p>Merger of health and fitness center and indoor recreation noted for discussion.</p> <p>Bottled water deleted as a use.</p> <p>The current draft of "flex building" does not have embedded standards.</p> <p>Merger of light manufacturing with wood, metal, stone craft is noted for discussion. Comment #1504 by Mr. Ruedisueli suggests breaking wood, metal, stone craft into separate categories, which is inconsistent.</p> <p>Merger of energy storage and oil and gas storage noted for discussion.</p> <p>According to a 20-year old article, it appears that Loudoun County has no marinas: "Region's Growth Has Marinas Overflowing", Washington Post (August 5, 2001) at https://www.washingtonpost.com/archive/local/2001/08/05/regions-growth-has-marinas-overflowing/f791b4b7-6798-488a-a6fd-ed4f8f3951df/. Is this still true? Is it even possible to build a marina along the Potomac River, or along any lakes, reservoirs, or other water features in the County?</p> <p>For minor utilities, are you asking about the impact of merging different substation types under this definition? The impact is that these substations are not allowed in the same districts, although the standards in 3.06 could address buffering or other performance standards.</p> <p>The concerns about merging telecommunication facilities are noted, and will be addressed in 3.06.</p>

ID	Section
	<p>The major and minor utility definitions separate underground and overhead utility lines. The 150 Kv threshold is statutory.</p> <p>I do not know how many testing stations the County has – does anyone on staff know? This definition is carried forward from the existing Zoning Ordinance.</p> <p>We could fold community gardens or community support agriculture into the definition of “agriculture.” However, there may be situations where placetypes, neighborhood character, or other considerations make a community garden appropriate but not a more intensive agricultural use.</p> <p>If horticulture were deleted, would we fold this into agriculture or another use? If not, where would we allow something like a Christmas tree farm?</p>
#706	[Table Format] Use Classifications, Categories, and Types
<p>By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021</p>	Do we need both 'Energy storage' and 'oil & gas storage' as separate uses?
#1604	[Table Format] Use Classifications, Categories, and Types
<p>By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021</p>	I agree we can combine these.
#702	[Table Format] Use Classifications, Categories, and Types
<p>By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021</p>	I hate to wordsmith, but I don't think its a great idea to use words in definitions that most people do not understand. Thus is the definition of 'Personal instructional services', 'terpsichorean' while a handsome word, could be replaced with a more common term, like 'dance'... Scrutinize all definitions to use simple terms.
#692	[Table Format] Use Classifications, Categories, and Types
<p>By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021</p>	Definition of 'mobile home' seems vague. Is it a recreational type of home either self-powered or towed?
#1607	[Table Format] Use Classifications, Categories, and Types
<p>By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021</p>	Mobile homes are factory-built single-family dwellings are not built to either the building code (a modular home) or HUD Code (a mobile home).

ID	Section
#9982	Appendix C: Land Development Application Fees
By: Packie Crown Tags: zoc pcrown@bowman.com Date:5/12/2022	Fees should be adopted as an administrative document instead of included in the ZO. This provides greater flexibility to the BOS to adjust fees, as needed, without requiring a ZOAM to do so.
#10131	Appendix C: Land Development Application Fees
By: Judi Birkitt Tags: staff judi.birkitt@loudoun.gov Date:6/7/2022	I understand the need for flexibility. The County is making the change in response to legal counsel.
#6244	A.14 Planned Development-Rural Village - PD-RV
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/17/2021	Where is "Satellite Conservancy Subdistrict" defined?
#9205	A.14 Planned Development-Rural Village - PD-RV
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	A.10.E.2. This is a legacy district. We are not making major revisions to legacy districts. Retaining only to regulate existing proffered districts, but it will not be allowed to expand.
#6243	A.14 Planned Development-Rural Village - PD-RV
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/17/2021	Don't require an open space easement...it will just become overgrown fields. Instead, allow one residence on it, plus farm buildings, and encourage agriculture. This will help the overall economics of the property. (Goal: To make this concept work.) Alternatively, give the developer the option of donating a conservation easement and getting the economic benefits, but have the easement allow one "division," meaning that one residence would be allowed on it. This is a bit complicated since it touches on easements, development/zoning, and financial deal structure. I'm experienced in each of these tasks and would be happy to help offline.
#9199	A.14 Planned Development-Rural Village - PD-RV
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	This is a legacy district. We are not making major revisions to legacy districts. Retaining only to regulate existing proffered districts, but it will not be allowed to expand.
#6239	A.14 Planned Development-Rural Village - PD-RV

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	Caution: While the "purpose" language is helpful, there should be a disclaimer in the front of the ZO that says, "Purpose statements are general explanations of rationale. The text of the Zoning Ordinance, as written, controls."
#9200	A.14 Planned Development-Rural Village - PD-RV
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	This is why the purpose statement is italicized and bulleted; it is differentiated from the regulations.
#6158	A.14 Planned Development-Rural Village - PD-RV
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	300 acre minimum is too large. Suggest 50 acres, which would evoke Lincoln, Bloomfield, etc.
#9201	A.14 Planned Development-Rural Village - PD-RV
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	This is a legacy district. We are not making major revisions to legacy districts. Retaining only to regulate existing proffered districts, but it will not be allowed to expand.
#6157	A.14 Planned Development-Rural Village - PD-RV
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	Why a "rectilinear pattern of streets"?
#9202	A.14 Planned Development-Rural Village - PD-RV
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	Because it is supposed to be a rural village. Nonetheless, this is a legacy district, so we are not making major revisions to legacy districts. Retaining only to regulate existing proffered districts, but it will not be allowed to expand.
#6156	A.14 Planned Development-Rural Village - PD-RV
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	Purpose - Who would own "its own public water and sewer facility"? HOA? Loudoun Water?
#9203	A.14 Planned Development-Rural Village - PD-RV

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	Loudoun Water
#6060	A.14 Planned Development-Rural Village - PD-RV
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.07.09.E.1 Planned Development-Rural Village – PD-RV. Size and Location of Subdistricts. Village Conservancy Subdistrict. Although a Legacy district, how might the Village Conservancy open space buffer be integrated into potential future LPAT plans?
#9204	A.14 Planned Development-Rural Village - PD-RV
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	The Zoning Ordinance implements the Comprehensive Plan (CTP and GP). It does not implement the LPAT, although the development standards should incentivize its implementation.
#6059	A.10 Joint Land Management Area-20 - JLMA-20
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.07.06 Joint Land Management Area-20 - JLMA-20, 2.07.07 Agricultural/Residential-3 - A-3, 2.07.08 Agricultural-10 - A-10. Open space should be contiguous to protect wildlife corridors and other natural resources. This could also include considerations for potential LPAT connections. These sections are starkly devoid of details related to open space and pedestrian/bicycle network. Although they are "Legacy" districts, shouldn't they include requirements for siting and resource protection such as the ones included in 2.03.03.F.3 Transition Compact Neighborhood – TCN?
#9198	A.10 Joint Land Management Area-20 - JLMA-20
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	This is a legacy district, so open space requirement are only retained because we are not making major revisions to legacy districts. Retaining only to regulate existing proffered districts, but it will not be allowed to expand.
#6058	A.09 Transitional Residential-2 - TR-2
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.07.05.G Transitional Residential-2 TR-2. Siting of the Open Space and Building Lots. As with 2.03.03.F.3., this section does a good job outlining siting for open space.
#9197	A.09 Transitional Residential-2 - TR-2
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov	This is a legacy district, so open space requirement are only retained because we are not making major revisions to legacy districts. Retaining only to regulate existing proffered districts, but it will not be allowed to expand.

ID	Section
Date:3/22/2022	
#6154	A.07 Single-Family Residential – R-1, R-2, R-3
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	In R-1, the phrase "...areas planned and served..." makes no sense. Suggest using "or" instead of "and." Further, "planned" is vague and needs so specificity, such as "planned and budgeted by Loudoun Water>"
#6056	A.07 Single-Family Residential – R-1, R-2, R-3
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.07.03 Single-Family Residential – R-1, R-2, R-3. Open space should be contiguous to protect wildlife corridors and other natural resources. This could also include considerations for potential LPAT connections. This section is starkly devoid of details related to open space. Although a legacy district, shouldn't this include requirements for siting and resource protection such as the ones included in 2.03.03.F.3 Transition Compact Neighborhood – TCN?
#9195	A.07 Single-Family Residential – R-1, R-2, R-3
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	This is a legacy district. We are not making major revisions to legacy districts. Retaining only to regulate existing proffered districts, but it will not be allowed to expand.
#6055	A.04 Planned Development-Active Adult Retirement Community - PD-AAAR
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.07.02 Planned Development-Active Adult Retirement Community - PD-AAAR. Common Open Space, Including Recreational Spaces. Open space should be contiguous to protect wildlife corridors and other natural resources. This could also include considerations for potential LPAT connections. This section is starkly devoid of details. Although a legacy district, shouldn't this include requirements for siting and resource protection such as the ones included in 2.03.03.F.3 Transition Compact Neighborhood – TCN?
#9194	A.04 Planned Development-Active Adult Retirement Community - PD-AAAR
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	This is a legacy district. We are not making major revisions to legacy districts. Retaining only to regulate existing proffered districts, but it will not be allowed to expand.
#6155	A.02 Planned Development-Commercial Center - PD-CC
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com	In E, the term "where feasible" is vague. Economically feasible in a developer's opinion? Physically feasible per an engineer? Etc.

ID	Section
Date:11/16/2021	
#9191	A.02 Planned Development-Commercial Center - PD-CC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/21/2022	This is a Legacy District and will only apply where currently approved. We are only revising Legacy Districts to achieve similar formatting to the newly drafted districts.
#6057	A.02 Planned Development-Commercial Center - PD-CC
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.07.04 Planned Development-Commercial Center -- PD-CC. Open space should be contiguous to protect wildlife corridors and other natural resources. This could also include considerations for potential LPAT connections. This section is starkly devoid of details related to open space and pedestrian/bicycle network. Although a legacy district, shouldn't this include requirements for siting and resource protection such as the ones included in 2.03.03.F.3 Transition Compact Neighborhood – TCN?
#9190	A.02 Planned Development-Commercial Center - PD-CC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/21/2022	This is a Legacy District and will only apply where currently approved. We are only revising Legacy Districts to achieve similar formatting to the newly drafted districts.
#6153	A.01 Planned Development - Housing - PD-H
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	Why do we even have this district? Let the underlying district prevail. While I understand that you may want to encourage imaginative projects, this seems like a giant loophole.
#9192	A.01 Planned Development - Housing - PD-H
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	This is a legacy district. Retaining to regulate existing proffered districts, but it will not be allowed to expand.
#6054	A.01 Planned Development - Housing - PD-H
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.07.01.J Planned Development - Housing - PD-H. Open Space. Open space should be contiguous to protect wildlife corridors and other natural resources. This could also include considerations for potential LPAT connections. Although a legacy district, shouldn't this include requirements for siting and resource protection such as the ones included in 2.03.03.F.3 Transition Compact Neighborhood – TCN?

ID	Section
#9193	A.01 Planned Development - Housing - PD-H
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/22/2022	This is a legacy district. We are not making major revisions to legacy districts. Retaining only to regulate existing proffered districts, but it will not be allowed to expand.
#5719	A.01 Planned Development - Housing - PD-H
By: Maura Walsh-Copeland Tags: zoc 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	A.01 Planned Development - Housing - PD-H
By: Kate McConnell Tags: 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.
#13941	Utility Transmission Line, Underground
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add thermal energy to the list of transmission/conveyance uses
#13936	Solar Facility
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add Solar, Community to the definitions list for multi-family housing and HOAs.
#7165	Rivers and Streams
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	This definition is very broad and subject to debate. This may be the most important definition to define clearly. There are many areas draining 100 acres that don't "flow". Then, how do you define "flow", if it does exist. Many regulatory bodies have spent excessive time defining Streams. This is way too general.

ID	Section
#4060	Perennial Headwaters
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	Perennial Headwaters: same point as earlier--other watersheds have equally important perennial headwaters and shouldn't be included.
#6861	Other Protected Resources
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.03.05 DEFINITIONS. OTHER PROTECTED RESOURCES. Wetlands are mentioned as "other protected resources." Wetlands creation and protection could be used as a tool to reduce post-development runoff peak rate, frequency, volume. Why are there not guidelines and performance standards to also protect wetlands and wetland buffers to protect and improve stream and watershed health?
#8025	Other Protected Resources
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Staff will discuss internally
#9874	Lot Coverage
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/24/2022	Lot coverage definition should be revised to be measured by project (or by applicable ZMAP/proffers) rather than by "lot". This hampers subdivision which is sometimes needed for financing or for tenant requirements and many times ends up "stranding" lot coverage.
#12291	Live/Work Dwelling
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/14/2022	Live/work dwelling--make sure that the definition does not preclude single or multi-story, mixed-use or strip mall retail buildings that could accommodate both a residence and a work space, as an adaptive reuse.
#12961	Ldn
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	C.3.a & b. Residents will be put at a disadvantage; there are health impacts and this is inconsistent with long-standing county policy. No applications for residential uses should be approved in LDN 65. This is an equity issue.
#12960	Ldn

ID	Section
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	With the adoption of the revised AIOD, can we assume that the revised study will be substituted instead of the 1992 study?
#9873	Floor Area Ratio (FAR)
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/24/2022	FAR definition should be revised to be measured by project (or by applicable ZMAP/proffers) rather than by "lot". This hampers subdivision which is sometimes needed for financing or for tenant requirements and many times ends up "stranding" FAR. If a project is approved 100,000 sf of development, it should be able to get all 100,000 regardless of the subdivision that occurs (other than making sure each lot meets the minimum lot requirements).
#13576	Farm-based Tourism
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:7/18/2022	11.03 Definition of farm needed. The new proposed Definition of & Farm; as part of the ZOR states that a Farm involves the growing or raising of agricultural products OR processing; Elsewhere in the zoning ordinance, properties in AR-1 or AR-2 can only host ag processing if 51% of the products being processed are grown or raised on that parcel. In reality this makes processing of vegetables, meat, or grain on even a small custom scale impossible since most people farm multiple parcels and if they are processing, process for multiple customers beyond their own product. The definition of farm should delete the reference to processing. The requirements for ag processing in AR-1 and AR-2 should in turn be amended to allow processing of crops grown within Loudoun, but beyond JUST the parcel the processing takes place on. The 51% requirement should remain in place to require processing of 51% products from Loudoun (meat, vegetables, and grains).
#13514	Crest
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Comments for 4.04.E and F: Performance Standards should require: 100 ft. setback from the crest of ridge and ensure that the built structure stays under an unbroken forest canopy at the ridgeline.
#3964	Crest
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	This definition is not adequate as there may be multiple crests and sub-crests. In some cases, the ridgetop is so flat that no single high point can be determined. Also dependent on the level of accuracy of the survey.
#4177	Crest
By: Christopher Blough	Acknowledged. Any feedback for improving the definition is welcome.

ID	Section
Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	
#13526	Covered Activities
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	In Section C. Uses and Activities-3. Special Exception Approval Required: Delete 3.c. "Groundwater extraction for commercial use or sale" as part of allowable special exceptions. Commercial groundwater extraction is not an allowed use in the Rural Policy Area and shouldn't be in the MDOD.
#13524	Covered Activities
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	D. Mountainside Resource Protection Setbacks. In addition to the setbacks required in this section, add 100 foot setbacks to wetlands and vernal pools in the MDOD and add their definitions to list.
#13523	Covered Activities
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Performance Standards Section F.4.c. Add "dwelling" to the sentence-Minimal clearing for dwellings, roads and drives on existing slopes of greater than 25%.
#13519	Covered Activities
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Performance Standards section E. Support the draft text limiting the amount of clearing allowed on 15% to 25% slopes to 25% max in addition to minimizing the size of breaks in the canopy.
#13518	Covered Activities
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Performance Standards for sections E. and F. To reduce erosion and land slides or slumping that may threaten stability of buildings, slopes and water quality, higher construction standards in Facilities Standards Manual for MDOD including maximum impervious cover percentages must be observed.
#13495	Covered Activities
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	Section 4.04 doesn't provide for comments on anything other than definitions (which do not include a specific definition of MDOD), so I'm putting a comment on the overall MDOD here. MDOD should be applicable and defined as all areas above 8% slope so as to provide context to the various categories of slopes which currently result in spotty protections.

ID	Section
#10992	Covered Activities
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"4.04 MDOD . Why was the following text that most clearly outlines the establishment of MDOD removed (or moved) from the initial description of MDOD? Can Staff reinstate or confirm where equivalent text is located? The Mountainside Development Overlay District is hereby established as an overlay district, meaning that this district is overlaid upon other districts and the land so encumbered may be used in a manner permitted in the underlying district only if and to the extent such use is also permitted in the overlay district. 4.04 MDOD -- Procedures as outlined in Current Zoning Section 4-1606. Will these all be included in the Procedures Chapter verbatim? If not, what text changes are/will be made? Staff Response: Similar to LOD comment, a general overlay district definition will be provided explaining that an overlay district is a zoning district overlaid upon other zoning districts. The latter portion ""land so encumbered may be used in a manner permitted in the underlying district only if..." describes the permitted uses of the overlay district and has been relocated to 4.03.D. We can make further adjustments to the language of 4.03.D for clarity. 2022 Round 3 Input: Restore the language for the description of MDOD as an overlay district overlaid upon other zoning districts."</p>
#10991	Covered Activities
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"4.04.H MDOD Supplemental Application Materials. 1. Administrative Applications and Proposed Covered Activities. This whole section justifies the earlier request for coordination between departments beyond Building & Development. The July 2021 change in Code of VA will allow LOCAL county management of the Health Department (vs. as a State agency). As it was requested by Loudoun County and will be likely to be adopted by Loudoun, it would be prudent (required?) to consider the departmental coordination and requirements NOW to close the known loopholes. Therefore, will all planning ZOR regulations anticipate this change in the event it is implemented by Loudoun County by formal ZOR adoption? Staff Response: Based on the ""Covered Activities"" section, all applications, land disturbances, land disturbing activities, and uses are covered by the MDOD regulations. We agree on the importance of interdepartmental coordination and can consider any additional feedback for references to other departments in this subsection/language. However, a locational clearance is provided by the Department of Building and Development. If you would like to require a review of a locational clearance by other County departments, please advise on the specific department(s) 2022 Round 3 Input: This request for procedure review between DPZ, B&D, HD and other departments cannot be determined whether it has been addressed as the section reference is still not available for review as of 6/6/2022. ""Additional MDOD Specific Procedures. Refer to Section 7.01.F.2.e for additional MDOD specific procedures."</p>
#10990	Covered Activities

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"MDOD F.2 and G.4 Performance Standards. There seem to be so many work arounds for getting houses built. Submissions received that recommend against allowing ANY additional clearing beyond what is necessary for the house itself and drainfield. i.e., no additional allowance for ""yard."" This complies with Commission of Revenue assessment of MDOD properties, correct? Staff Response: We can consider further limiting clearing for allowed residential uses. However, it may not be possible to require that another requirement of the zoning ordinance not be provided" STATUS?
#10988	Covered Activities
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"4.04.C MDOD. C. Applicability and Exemptions 1.c 1-3 What are the definitions for slight or limited, moderate, and severe environmental and public safety impacts? Staff Response: Carry over language from existing text. This will take further research to determine the intent and use of these terms during the original drafting" STATUS?
#10987	Covered Activities
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"4.04 MOUNTAINSIDE DEVELOPMENT OVERLAY DISTRICT (MDOD). C.2 Exemptions. How will the coordination between applications for Zoning, B&D, Health Dept./ODW, Loudoun County Soil and Water Conservation District (LCSWCD), Natural Resources and Conservation Service (NRCS) be addressed in ZOR to close known loopholes? Example available upon request. Staff Response: We would be happy to consider any examples of procedures regulations that cover interdepartmental reviews 2022 Round 3 Input: Wonderful! Examples will be forthcoming in separate communication."
#10986	Covered Activities
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"4.04. MDOD. Conflicts/loopholes between C, F and G. What under any other circumstances would require a grading permit is being allowed for a ""Forest Management Plan"" that has known prior disclosure of SFD development plans. This process loophole is actually even enabled with G.6.b. by not requiring Health Department groundwater (and septic) until the ""record plat"" stage (for lots after 10/4/95). How will this be addressed? Staff Response: Open for discussion. Staff recognizes the existing performance standards have expressed loopholes as commented, in the past 2022 Round 3 Input: Procedures, permit requirements and handoffs between departments must be reviewed and ""fixed."" To create a mechanism for enforcement, the ZO requirements must require the prerequisite information for full development plans be submitted before grading permits are granted. Similarly, grading permits relying on ""Forest Management Plan"" must include mechanisms for on-site review/inspection to not allow site clearing on mountainside as a loophole for residential or business site preparation without permits."

ID	Section
#10985	Covered Activities
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"4.04.D MDOD Uses and Activities. As PUBLIC RECORDS (onlinerme.com) show, regulation of high-intensity uses requiring large parking areas formed from clear cutting/land disturbance (with or without a grading permit) has impacted septic fields on the property. This is not only a health, safety and welfare concern for the property owner and patrons, but definitely on a mountainside, a concern for down hill properties. The Covered Activities list is insufficient to ensure protection for citizens and patrons, therefore will high-intensity uses be EXCLUDED from the MDOD Use Matrix list? Staff Repsonse: We can look into a review of MDOD permitted uses, but may be constrained by what is (or isn't) explicitly covered under the 2019 GP and the Code of Virginia 2022 Round 3 Input: Staff has the means and authority to review high-intensity use regulations through 2019 Comp Plan RPA Policy 3, Strategy 3.1 and Actions A-C to 3.1. Ensure compatibility of rural economy uses through the evaluation of the scale, use, intensity, and design (site and building) of development proposals in comparison with the dominant rural character and adjacent uses. A. Evaluate and revise zoning regulations and development standards for rural economy uses. Such regulations and standards will address traffic capacity, safe and adequate road access, number of employees, site design standards (e.g., land disturbance, buffering, use intensity, siting, and architectural features), and public health, safety, and welfare. B. Consider the establishment and/or expansion of existing commercial, industrial, and institutional uses by Special Exception if the use and/or expansion: 1) is compatible in scale, use, and intensity with the surrounding rural environment, 2) uses building forms, massing, and architectural styles that reflect the surrounding rural character 3) preserves ridgetops, natural resources, farmland, and open space, and 4) meets applicable zoning regulations and development standards. C. Non-agriculturally related commercial uses may be permitted by Special Exception if the use is compatible in scale and intensity with the agricultural and rural character of the area; poses no threat to public health, safety, and welfare; and helps to preserve farmland, open space, and/or continued agricultural operations."</p>
#10984	Covered Activities
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"4.04 MOUNTAINSIDE DEVELOPMENT OVERLAY DISTRICT (MDOD). C.2.b Exemptions, Timber Harvesting & Siviculture. Does the County ensure or monitor the requirement below and ENFORCE when presented with KNOWN violations? Examples/case studies demonstrate the lack of coordination and notification between County and State Departments, including the Department of Forestry, Virginia Department of Health and Virginia Department of Transportation (VDOT). Section 10.1-1181.2.H of the Code of Virginia. Prior to completion but not later than three working days after the commencement of an operation, the operator shall notify the State Forester of the commercial harvesting of timber. . . . The notification may be verbal or written and shall (i) specify the location and the actual or anticipated date of the activity, (ii) include an owner's name or the owner's representative or agent and contact information, and (iii) be provided in a manner or form as prescribed by the State Forester. If an operator fails to</p>

ID	Section
	<p>comply with the provisions of this subsection, the State Forester may assess a civil penalty of \$250 for the initial violation and not more than \$1,000 for any subsequent violation within a 24-month period by the operator. Such civil penalties shall be paid into the state treasury and credited to the Virginia Forest Water Quality Fund pursuant...</p> <p>Staff Response: The County communicates with and inquires from VDOF when timber operations are reported. The VDOF does not have any notification requirement to the County. If an operation or activity is not covered by the State Forester, then the County pursues zoning enforcement</p> <p>2022 Round 3 Input: This is a known, ongoing communication and enforcement loophole that must be addressed, either through additional MDOD procedures or initiation of legislative request for coordination procedures between State (VDOF, VDH, VDOT) and Loudoun County departments of Building & Development and Planning & Zoning."</p>
#10983	Covered Activities
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"4.04.C MDOD USES AND ACTIVITIES. Even with the reference to the ""Covered Activities"" definition, and ""2. Permitted Uses"" the regulations are insufficient for the protection of MDOD. A clear list of Uses that should NOT be permitted for MDOD, Villages and Clusters and been prepared and submitted. HOW can/will Staff incorporate review, consideration and implementation of separate use lists AS DISCUSSED during the Use Table Matrix and Use-Specific Standards ZOC discussions? Staff Response: Staff will consider all feedback and suggestions, including permitted uses in the MDOD. 2022 Round 3 Input: A clear list of Uses that should NOT be permitted in MDOD, Villages and Clusters has been presented. Staff must determine how this can be implemented with Use Tables and Overlay Districts using the available enCodePlus table/calculation functions."</p>
#3948	Covered Activities
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/10/2021</p>	What does "Uses in Section3" imply?
#4096	Covered Activities
<p>By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021</p>	this includes the establishment of all uses described in Chapter:3 as "Covered Activities" for the purposes of the overlay district.
#9875	Civic Uses

ID	Section
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/25/2022	this definition has not been updated to match the new 2019 comp plan definition that includes gathering spaces, both indoor and outdoor.
#10054	Civic Uses
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:6/2/2022	Whenever staff addresses this comment, I think it is worth a discussion with the ZOR team and Community Planning about how to address. This has been a longstanding conflict between the plan and the ZO, and I think we should all be in agreement on the resolution.
#10960	Agriculture
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.06.08.00. AGRICULTURE. ""Aug. 25th Comments RE: ZOAM-2015-0006. DEFINITION OF """"FARM"""" / Agricultural Operation – Per Item 10a, BOS/TLUC report April 19, 2018-ROIA for ZOAM-2015-0006, Ag Operations and Definition of Farm were to be reviewed. How have the following changes been incorporated in the Draft Text? Add new “Agricultural Operation,” “Agricultural Products” and “Farm” definitions. The Ordinance currently does not define either Agricultural Operation, Agricultural Products, or Farm; however, these terms are consistently referenced throughout the Zoning Ordinance. The Code of Virginia defines these terms and references these terms in relation to agricultural activities and local regulation of agricultural activities, such as Limited Distillery, Limited Brewery, Farm Winery, and Agricultural Processing. Amendment creates new definitions to provide clarity in distinguishing agricultural properties and functions, maintains consistency with the Code of Virginia, and eliminates inconsistency and avoid misunderstandings with the Ordinance. Source of Proposed Amendment*: Staff recommends to align terminology with Code of Virginia" Staff Response: Staff is currently evaluating additional definitions to clarify and align with VA state code</p> <p>2022 Round 3 Input: 4/18/22 draft text does not include the definition for ""Farm,"" “Agricultural Operation,” or “Agricultural Products” used throughout the ZO causing lack of clarity and consistency of use-specific standards with state code. "</p>
#6957	Adjacent Steep Slopes
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:1/4/2022	Why can't adjacent steep slopes definition have a vertical incline of greater than 15%?
#8024	Adjacent Steep Slopes
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	We will contemplate changing to 15%

ID	Section
#10338	Abattoir
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/22/2022	A limited brewery is NOT AGRICULTURE. It is food service and needs to be in that section.
#10337	Abattoir
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/22/2022	Small Business. This definition is currently being abused by allowing a sitework contractor to operate in a residential neighborhood. The definition says "temporary," so define that by having a 12-month limit. (at least for on-site heavy equipment.)
#10336	Abattoir
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/22/2022	Banner signs should include feather signs.
#10335	Abattoir
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/22/2022	Rural Resort. Suggest max of 20 rooms. State that restaurants are for lodgers.
#10334	Abattoir
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/22/2022	Rural recreational, outdoor: Ban firearms and shooting ranges.
#10333	Abattoir
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/22/2022	Rural Economy Uses: Suggest this addition - "...businesses that are land- AND - AGRICULTURE - based..."
#10332	Abattoir

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/22/2022	Rooming House: Suggest a maximum of 10 boarders.
#10315	Abattoir
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/21/2022	Performing Arts Center: Why does this have to host at least 8,000 people? A better number would be 400.
#13546	13.01 Interpretation of Zoning Ordinance
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add missing definitions for: Wetlands Vernal Pools Natural Open Space Environmentally Sensitive Area/Open Space Meadow Turf grass Lawn Native grass Native plant Energy storage Batteries
#10307	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/21/2022	Home Occupation: Add: "...does not include contracting services." (This has been abused in our area.)
#10306	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/21/2022	Guest house: Suggest a maximum of 5 guests.
#10305	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/21/2022	Guest farm: Suggest a limit of 10 beds.

ID	Section
#10304	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/21/2022	Golf Driving Range: After "...may contain outdoor lighting" the phrase "subject to the provisions of this ordinance."
#10287	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/20/2022	Country Inn: This category has been used as a loophole to allow glamping. Think BIG: Why is this category even needed, it's essentially the same as a hotel/motel.
#10286	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/20/2022	Campground: Office, retail etc. should be for campers only, not the public.
#10285	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/20/2022	Day Camp: Should not permit shooting firearms.
#10280	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/20/2022	IMPERATIVE: As to Breweries, delete the second sentence. Simply calling any 10-acre lot a farm is ridiculous and is being abused.
#10279	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/20/2022	B&B Homestay and B&B Inn: Suggest putting maximum number of rooms or beds as upper limits. Suggest 8 beds for Homestay and 12 beds for Inn.
#10278	13.01 Interpretation of Zoning Ordinance

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/20/2022	IMPERATIVE Definition of Agriculture: Include "animal husbandry," which is the term that picks up horse farms.
#10277	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/20/2022	Add Section 11.01 E: "Purposes" introduce chapters of this ordinance. Textual provisions shall control.
#10276	13.01 Interpretation of Zoning Ordinance
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:6/20/2022	Add an 11.01 D: "Purposes" as set out in introductions to sections of this ordinance are for convenience only. Textual provisions shall control.
#9739	11.16 Density Credit for Public Uses
By: Bill Junda Tags: zoc bjunda@gordon.us.com Date:4/22/2022	5.01.11A.1 appears to only apply to interchanges? shouldn't it apply to all CTP road ROW dedications? Can A.7 be made clearer to allow for density credit for proffered road dedications (without monetary compensation)?
#11088	11.15 Appeals
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.14.F.3 APPEALS. F. Stay of Action. 3. Exceptions. b. Has the following regulation been discussed internally and reviewed by the Heritage Commission? "The decision of the Board to deny the right to raze of demolish a historic landmark, building, or structure is not stayed by filing a petition of appeal with the Loudoun Circuit Court."
#14447	11.15 Appeals
By: Rick Hancock Tags: staff richard.hancock@loudoun.gov Date:8/5/2022	This is from the Code of Virginia § 15.2-2306(A)(3).
#14163	11.14 Enforcement
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/19/2022	B. General Provisions should include enforcement action (fines) for wilfully false statements on permits.

ID	Section
#14160	11.14 Enforcement
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/19/2022	E.10.b.1. Substitute "has been returned to pre-violation conditions" for "corrected" to the satisfaction...
#14158	11.14 Enforcement
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/19/2022	6.a.Add "and return the property to pre-violation conditions." to the end of the sentence.
#14157	11.14 Enforcement
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/19/2022	3. The Zoning Administrator "must" not "may" take appropriate action...
#14155	11.14 Enforcement
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/19/2022	7.13 Enforcement by complaint is inadequate to address the many zoning violations that occur in the RPA. There should be an identified rural enforcement area and staff identified to address violations that occur during non-business hours.
#13542	11.14 Enforcement
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:7/18/2022	Loudoun County Farm Burau 7.13.B.6.b. In the past the penalty for violations has failed to impact the behavior and correct the issue. Active enforcement would be much better to protect the county and its residents from those with intent to take advantage of our system but is still not in discussions we must increase the penalty for those reported.
#13536	11.14 Enforcement
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:7/18/2022	Farm Burau 7.13.B.4 ENFORCEMENT. This has caused many issues in the past, this is a known problem for residents living near violators to get assistance from the county. Specify what constitutes a "written complaint" and how it may be submitted.

ID	Section
#11087	11.14 Enforcement
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"7.13.E ENFORCEMENT. of Performance Standards. [Current ZO 5-1500] The numbering and lettering for this section are incorrect. Starts with ""8"" and ""d."" instead of 7.13.E.1.a and b"
#11086	11.14 Enforcement
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"7.13.D.1.b. ENFORCEMENT. Civil Violations. Have there been no discussion/efforts to increase the fines and/or decrease the time between charges for violation more than once in any 10-day period? Or is this related to Code of VA? Cost of violations as become a general ""business expense"" due to the limited dollars and frequency."
#11068	11.14 Enforcement
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.13.B.4 ENFORCEMENT. General Provisions. States, "whenever a violation occurs, or is alleged to have occurred, any person may file a WRITTEN COMPLAINT with the Zoning Administrator." As this has been a known issue and source of misunderstanding for many years, the form and type of "written complaint" should be defined, such as to state, "in the form of a letter, email, submitted compliant via Loudoun Express Request (LEX)."
#11085	11.11.08 Temporary Special Events – Additional Requirements
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	When will Sections 7.11 and 7.12 be available for review?
#11084	11.11.08 Temporary Special Events – Additional Requirements
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.10.07 SPECIAL EXCEPTION REVIEW. Temporary Special Events. A. Applicability indicates regulation is for temporary special events that the applicant expects to regularly during the life of the Special Exception use or Minor Special Exception use. Other than Banquet/Event Facility special exception permits, what other uses would this apply to?
#11083	11.11.01 Special Exception
By: Maura Walsh-Copeland Tags: zoc	7.10.01 SPECIAL EXCEPTION REVIEW. When will draft text be available for 7.10.01?

ID	Section
Maura@Walsh-CopelandConsulting.com Date:7/9/2022	
#10461	11.10.09 Planned Development (PD) - Additional Requirements
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/3/2022	I find the submitted requirements and overall sense of the section to be too inflexible to be a true PD district. Specifically: B.1. Should not have to outline all the standards. What should be required is a chart comparing the base district standards with the proposal. There should be no need to refer to modifications. The comparison chart will show the differences and the section should have a series of evaluation criteria to measure the acceptability of the proposed differences. Square footage is poor English and poor planning jargon. Proposed maximum square footage of...floor area should simply be square feet of floor area or just 'floor area'. Footage refers to films and video according to Webster. C. I refer to and prefer the current Ordinance language in 6-1216 A.-C. It is simpler and offers more flexibility.
#11069	11.10.08 Historic Overlay Districts (HOD) - Additional Requirements
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"7.09.08. HISTORIC OVERLAY DISTRICT ADDITIONAL REQUIREMENTS. What is the definition of ""HISTORIC""? The word is used throughout the ZOR text without definition. There is a definition of ""Historic Setting."" Has Staff worked internally or with the Heritage Commission to define? Proposed text from multiple advisory groups: Definition of ""Historic"" 1. From 36 CFR 60.4 (criteria for evaluation for National Reg of Historic Places) The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects and possess integrity of location, design, setting, materials, workmanship, feeling, and association and a) that are associated with events that have made a significant contribution to the broad patterns of our history; or b) that are associated with the lives of persons significant in our pasts; or c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or d) that have yielded, or may be likely to yield, information important in prehistory or history. 2. Short version of the above The quality of significance in Loudoun County history, architecture, archeology, engineering or culture. May be present in districts, sites(including view sheds), buildings, structures and objects. May be associated with events, lives, or periods, or may yield information about the past. first is taken from CFR as the definition of what is allowed for NHR items"
#10463	11.10.03 Conditional Zoning (Proffers)
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/3/2022	7.09.04 is missing.

ID	Section
#11082	11.09 Commission Permit
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.08.B COMMISSION PERMIT. Initiation and other areas. There are a number of references to "Director" in this section. To be more clear for ALL ZO readers the text should clarify "Director of _____" (B&D? P&Z? other?) -- unless the County will have only ONE Director in the future.
#11081	11.08 Variance
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.07.B.2. VARIANCE. Initiation. Because the section was rearranged from the current ZO, the first reference of the acronym "BZA" is not defined. And when will Section 7.01.E be available for review?
#11080	11.08 Variance
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.07.A.2 VARIANCE. Unauthorized Variance. Similar to FOD, can LOD and/or MDOD be also added to the list where "no variance can be approved which would result in increased issues in these overlay districts?
#13673	11.06 Site Plan
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add EV charging station to the exempt category for residential and fleet uses.
#11079	11.06 Site Plan
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.05 SITE PLAN. Applicability. Exempt. ["Do not require a site plan and are exempt from the requirements of this section."] Good addition to clarify ag uses exempt, however please CONFIRM this applies to all ag high-intensity uses that involve access by the public as a part of such use? Why would they not be listed in the same manner other uses are listed for clarity and consistency in regulation enforcement?
#11078	11.06 Site Plan
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.05. SITE PLAN. This section differs from current ZO 6-700 that includes Sketch Plan requirements. Are sketch plan regulations located elsewhere, or no longer applicable?

ID	Section
#10466	11.06 Site Plan
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/3/2022	Curious if we should exempt projects that include no expansion of impervious surface (building footprint, parking). To allow tenant switch outs without a site plan.
#11077	11.05 Sign Permit
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.04. SIGN PERMITS. When will text be available for review?
#11075	11.04 Zoning Permit
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"7.03.C.3.b ZONING PERMIT. Review & Decision. Temporary Uses. It's great this section allows the Zoning Administrator to impose reasonable conditions necessary to ""ensure operation and maintenance of temporary special events mitigate potential adverse impacts on existing uses on adjoining properties and surrounding area and protect the public health, safety and general welfare."" 2022 Round 3 Input: Why is this requirement not applied EQUALLY to ALL USES that may have potential adverse impacts on existing adjoining properties and surrounding area for multiple days, weeks, months throughout the year?"
#11074	11.04 Zoning Permit
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.03.B.7 ZONING PERMIT. "County may allow concurrent review and approval of applications for multiple temporary uses or events on the same property" What are the intended types of "applications for multiple temporary uses or events?" (annual B&B event approvals? Banquet event? Other/what else?)
#11073	11.04 Zoning Permit
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"7.03.B.4.a.and b. ZONING PERMIT. Initiation. States ""applications must include an approved Site Plan or a plot plan."" Is that the same as a ""sketch plan?"" If not, then what are the zoning permit requirements with sketch plans? b. Does a ""description of the activity to be conducted regarding waste products, external effects, or other conditions which are regulated herein"" INCLUDE the use, external effects or other conditions for industrial wells or other activity separately applied for to the Health Department?"
#11072	11.04 Zoning Permit

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.03.A.5 ZONING PERMIT. Applicability. Zoning Permits are required prior to development within Floodplain Overlay District. Can LOD and MDOD be include?
#11071	11.04 Zoning Permit
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.03.A.3 ZONING PERMIT. Applicability. Zoning Permits are required prior to 3. Commencement of any use or change in use "a. Except for agricultural uses as provided in the definition of Agriculture." Should use "Agriculture, Bona fide" or exclude high-intensity uses that draw the public or circumvent coordination/communication with Health Department (e.g., well permits).
#11067	11.04 Zoning Permit
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"7.03.D.2. ZONING PERMIT. Approval Criteria. 2022 Round 3 Input: Production or bonafide agricultural farms/uses who wish to host educational events should have criteria similar/consistent to BnB regulations for an annual fee and inspection for x-number of annual events for x-number of patrons based on acreage and on-site parking availability. This should include the ability to have catered food or mobile food vendors. Example is 3.06.03.01-1 table for private parties for BnB's"
#11066	11.04 Zoning Permit
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"7.03.D.2c. ZONING PERMIT. Approval Criteria. It's great that temporary special events must ""not create significant adverse impacts on properties or improvements in the surrounding area,"" to ""include, but are not limited to: 1. Traffic, 2. Environmental, 3. Visual, glare, 4. Noise, or 5 Odors."" 2022 Round 3 Input: Why is this requirement not applied EQUALLY to ALL USE EVENTS that may have potential adverse impacts on existing adjoining properties and surrounding area for multiple days, weeks, months throughout the year?"
#11065	11.04 Zoning Permit
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"7.03.B.4.d. ZONING PERMIT. Initiation. Applications must include d. Certificate from the Health Department. 2022 Round 3 Input: The REVERSE should be also required, that permits/approvals to the Health Department MUST include the zoning permit information. Zoning permit information must not be ""optional"" or ""not applicable"" to obtain HD approval. "
#10465	11.04 Zoning Permit
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov	A. 2 Place period after "...and structure." Suggest delete A. 2 a and b.

ID	Section
Date:7/3/2022	
#11070	11.01 General Process Administration
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	7.01. GENERAL PROCESS ADMINISTRATION. When will text be available for review?
#10509	11.01 General Process Administration
By: russ forno Tags: zoc russ.forno@ofplaw.com Date:7/5/2022	Recommend waivers or modifications be allowed in all zoning districts as part of a development application. Property is unique everywhere and development shouldn't be filtered through a unilateral set of standards, when factors such as economy, technology and innovation can improve a zoning regulation.
#13803	10.05 Adaptive Reuse
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.10. Add a new section or revise purpose statement and eligibility requirements, etc to include re-use of non-historic existing buildings for the purpose of cost savings and embodied carbon capture benefits. Provide environmental incentives for the re-use of non-historic buildings.
#14234	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:7/21/2022	Non-historic buildings can be reutilized without meeting the adaptive reuse standards. They will need to request a rezoning to allow the uses desired. The adaptive reuse standards are drafted to ensure protection of historic buildings due to their importance. The point of the adaptive reuse regulations is not to allow any building to be used for a use not permitted in a district without considering the impacts of the use. For instance, if an applicant wants to reuse a non-historic building for residential uses in a zoning district that does not allow this use, the appropriate way to change this use is through a rezoning to a residential district.
#11053	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	11.3 Definition of "Live/Work Dwelling" Revision: A single building or space within a single building (e.g. studio, loft or 1 bedroom) used jointly for commercial/office and residential purposes where the residential use of the space is occupied by the person(s) operating the commercial/office use
#11052	10.05 Adaptive Reuse

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"Table 5.10-1 Uses Permitted as Adaptive Reuse. In the fifth line, Commercial Uses, recommend deleting Kennel indoor and adding "Kennel, indoor may be permitted by special exception if the building to be used was originally constructed for agricultural use (e.g., barn)."" This changes would allow an indoor kennel in someone's old outbuilding...or that it be rented for such a use."" To this section add: Allow Industrial/Production uses as follows: wood, metal and stone crafts. Allowing wood, metal, stone crafts would allow such uses, which is something often considered in an old barn/outbuilding."
#11459	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:7/13/2022	Staff did not add indoor kennel to the list. Kennel applications (indoor and outdoor) are typically contentious; therefore, staff did not find it appropriate to allow this use outside of the districts where it is currently permitted. Staff added the Wood/metal/stone crafts use.
#11051	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	Table 5.10-1 Uses Permitted as Adaptive Reuse. Recommend allowing additional density except in cases with an absentee landlord.
#11050	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	5.10.C.1. ADAPTIVE REUSE STANDARDS AND REQUIREMENTS. Add to first sentence - "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."
#11049	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.10.C.1. ADAPTIVE REUSE STANDARDS AND REQUIREMENTS. It is agreed that the setting of a historic property warrants protection, but that can still be done with some flexibility. Many old properties do not have space available on side or rear areas for parking so front parking should be acceptable to maintain usefulness of a structure. Changes to primary front facade may be necessary to keep a property in use Allow more options when making changes as some historic buildings and sites don't lend themselves to traditional zoning set-backs or off-street parking spaces. Where there are questions, we recommend the Zoning Administrator consult with the HDRC."
#11048	10.05 Adaptive Reuse

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.10.B. ADAPTIVE REUSE ELIGIBILITY. Begin each numbered criteria using similar context language 1. Identified as historically significant 2. Located in a village Conservation Overlay District 3. Greater than 50 years old. Delete the rest of #3 (a. 1-5, b.1, and c.1-3) through to C. Standards. Why would we discourage Adaptive Reuse by having these expensive and burdensome requirements? Reuse of an old structure should be encouraged and applauded."
#11466	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:7/13/2022	Revised 10.05.B.1 as suggested. Response to suggestion to remove 10.05.B.3 provided to similar comments on this section.
#11045	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	5.10.B.1. ADAPTIVE REUSE ELIGIBILITY. Add e. Designated a Loudoun County Heritage Site by the Heritage Commission
#11044	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	5.10.B. ADAPTIVE REUSE ELIGIBILITY. The list of eligibility reasons indicates "OR" in B.1.c. which is easily missed in review. Recommend stating: "To be eligible for adaptive reuse, a structure must be one of the following:" Clarify "at least one" or "one or more" Needs to be clear that structure must only meet one of the 3 criteria.
#11470	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:7/13/2022	Clarifying language added to Section 10.05.B.1.
#11043	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	5.10.B. ADAPTIVE REUSE ELIGIBILITY. Broaden 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.
#11042	10.05 Adaptive Reuse

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	5.10. ADAPTIVE REUSE STANDARDS - PURPOSE BULLETS #7 -- Add "Encourage sustainability" before the statement, "prolong building lifespans, encourage reuse of existing resources, generate activity, and facilitate market alternatives rather than demolition of existing, structurally sound historic structures, especially if they are vacant or in underutilized areas, especially by allowing use that may not otherwise be allowed."
#11041	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	5.10. ADAPTIVE REUSE STANDARDS - PURPOSE BULLETS #5 -- "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)."
#10511	10.05 Adaptive Reuse
By: russ forno Tags: zoc russ.forno@ofplaw.com Date:7/5/2022	Can we consider the re-location of a historic structure as another way to preserve?
#11555	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:7/13/2022	Relocation of a building in order to adaptively reuse it would not achieve the intent of allowing a use not allowed in the district where the building is located. Also, moving historically significant buildings is typically discouraged and a last resort in the field of historic preservation.
#9303	10.05 Adaptive Reuse
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:3/29/2022	While the purpose states that it is the goal to foster adaptive reuse of existing obsolete, underutilized, or historically significant structures, the regulations seem geared toward historic buildings to the exclusion of simply underutilized ones. Can the text be adjusted to address buildings which do not fall into the category of historically significant or contributing to historic districts? Such buildings could/should require architects or engineers, but should not require expertise in historic preservation as such.
#9311	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/30/2022	These regulations are geared toward reuse of historic buildings. The redevelopment standards to be developed by a consultant will address how non-historic buildings can be reused. We do not want to allow any building to be reused at anytime, especially if it would be more appropriate to be rezoned. Also, if the use is permitted, then they would not have to meet the requirements, the building could simply change uses.

ID	Section
#7680	10.05 Adaptive Reuse
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:1/24/2022	While adaptive reuse allows an existing nonconforming building to be used without a limit on density, required parking or open space, I would think any expansion should meet minimum setback standards.
#7832	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Section 5.09.C. requires that adaptive reuse projects comply with the requirements of this Zoning Ordinance, except as set forth in Sections 5.09.C and D below. Therefore, any new parking setback requirements must be met. Open space requirements may be very restrictive especially considering this requirement is being updated with this rewrite.
#7679	10.05 Adaptive Reuse
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:1/24/2022	Adaptive reuse should be able to make enhancements to the structure such as a new entrance or fenestration. Any historic structures should be reviewed by the HDRC.
#7833	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	The regulation does not limit changes to fenestration. It disallows an addition to the front of a building, which is the most prominent aspect to the public and should be protected. Also, if a historic structure is designated as an HOD, then the HDRC would review. This is addressed in Section 4.07. A new entrance addition could be added to the side of the building.
#7678	10.05 Adaptive Reuse
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:1/24/2022	5.09-2 Same issue with loading spaces. There should be no requirement. If they need one they can build one.
#7834	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	There is no requirement for a loading space if the building is not expanded. If they want to use an existing space, or want to provide a loading space, then the ZO regs apply. These regulations will prevent the use of existing loading space from being in a buffer, in the front yard, on the sidewalk, etc.
#7677	10.05 Adaptive Reuse
By: John Merrithew Tags: zoc	5.09-2 If the intent is to minimize parking, why not say parking will be limited to the lesser of existing parking or that required by Ordinance.

ID	Section
john.merrithew@loudoun.gov Date: 1/24/2022	
#7835	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/25/2022	I believe it does say this.
#7675	10.05 Adaptive Reuse
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 1/24/2022	5.09.A. These requirements are waaaay over the top. Many old buildings work well for adaptive reuse, but would never be considered historic and would not qualify for any historic register. The 50-year rule may be too restrictive. Consider past-their-prime shopping centers. They should be candidates for reuse.
#7836	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/25/2022	Not all buildings must be considered historic - this is only one category. And, we want to be careful not to allow every single building to be adaptively reused under these criteria. Buildings can be retrofitted for another use permitted in the district where it is located. This is to address buildings important to a community, but hard to retrofit to a use permitted in the district where it's located. Redevelopment standards currently in development by our consultant should address the reuse of non-historic buildings.
#7673	10.05 Adaptive Reuse
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 1/23/2022	Applicability: Expanding on John Merrithew's comments, I suggest adding that county facilities should always be considered for adaptive reuse over sale/demolition due to the sunk costs/sustainability benefits. This should also be expanded to branded stand-alone buildings (big box, drug stores, etc). In legislative applications, could the county ask for/require a cost/benefit modeling/analysis of reuse versus demolition/new construction in an effort to promote discussion around increasing sustainability and reducing energy consumption?
#7842	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/25/2022	We want to be careful not to allow every single building to be adaptively reused under these criteria. Buildings are allowed to be retrofitted for another use permitted in the district where it is located. This is to address buildings important to a community, but hard to retrofit to a use permitted in the district where it's located. Also, want to be careful that people are simply adaptively reusing buildings to circumvent a rezoning and increase density. Redevelopment standards currently in development by our consultant should address the reuse of non-historic buildings.

ID	Section
#7672	10.05 Adaptive Reuse
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 1/23/2022	Purpose: Suggest adding an additional bullet referencing a major value of adaptive reuse here and in the redevelopment section. There are sustainability and energy benefits of using existing buildings versus tear-down/new construction: reduced construction waste; reduced demand for new materials and the environmental cost of raw material loss, and the cost to create man-made materials and the overall cost of transporting those materials. Adaptive reuse of commercial buildings for affordable housing can also reduce the cost to provide affordable housing and should be mentioned in the purpose section here and in the redevelopment section.
#7843	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/25/2022	In this case, we want to be careful not to allow every single building to be adaptively reused under these criteria. Buildings are allowed to be retrofitted for another use permitted in the district where it is located. This is to address buildings important to a community, but hard to retrofit to a use permitted in the district where it's located. Also, want to be careful that people are simply adaptively reusing buildings to circumvent a rezoning and increase density. Redevelopment standards currently in development by our consultant should address the reuse of non-historic buildings and can include a sustainability statement.
#7533	10.05 Adaptive Reuse
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date: 1/20/2022	A. Applicability is contrary to the purpose statements, which appear to come from the Plan. AR should not be limited to historic properties. We need to be able to accommodate reuse of schools, office buildings, and data centers (when that internet fad fades).
#7844	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/25/2022	You are correct that AR is largely limited to historic properties, because we want to be careful not to allow every single building to be adaptively reused under these criteria. Buildings are allowed to be retrofitted for another use permitted in the district where it is located. This is to address buildings important to a community, but hard to retrofit to a use permitted in the district where it's located. Also, want to be careful that people are simply adaptively reusing buildings to circumvent a rezoning and increase density. Redevelopment standards currently in development by our consultant should address the reuse of non-historic buildings.
#7532	10.05 Adaptive Reuse
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date: 1/20/2022	The bulleted list may confuse people into thinking the AR is intended only for historic properties when as you go down the list it can be used for any vacant building.

ID	Section
#7845	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Revised to largely apply to historic properties. Non-historic properties will be addressed in redevelopment standards in development by our consultant.
#7354	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09.2.Table. D. ADAPTIVE REUSE INCENTIVES. LHVA find this table confusing, asking, "How is this table interpreted and how can it be implemented? Hard to determine what the incentives are?"
#7846	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	5.09 D provided directions on how to use the table. Will determine a better term than "incentives."
#7353	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09-2. ADAPTIVE REUSE. PARKING STANDARDS: Can all parking standards be waived for Adaptive Reuse Projects? It is often impossible for historic properties/districts to meet parking standards because parking was not an issue when these properties were built on. Historic districts each deal with parking in way that works for them. Issue for Small Area Plans but what will be done in the meantime if Small Area Plans are years off for evaluation and implementation?
#7847	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	As currently drafted, if there is no parking there would be no requirement to provide parking since 0 would be less than any requirement.
#7352	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09-2. ADAPTIVE REUSE. DENSITY. LHVA asks, "Does this allow mixed use then? Retail and residential on same property not bound by underlying per acre zoning density?"
#7849	10.05 Adaptive Reuse

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	It is possible, but the uses would have to comply with those permitted in Table 5.09-2.
#7351	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09.C. ADAPTIVE REUSE STANDARDS. PERMITTED USES. Table 5.09-1. What does the acronym "HPO" stand for?
#9312	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/30/2022	revised to HOD
#7350	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09.C. ADAPTIVE REUSE STANDARDS. PERMITTED USES. Table 5.09-1. VCOD/Village Small Area Plan spec uses permitted by right with exceptions does not take into consideration the INTENSITY of other use types and impacts to comply with the purpose to "Maintain compatibility of the adaptively reused building or structure with a surrounding neighborhood, community, Place Type, village, or historic district."
#7848	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Incorporating how things are approved, e.g. by special exception, and requiring use specific standards to apply should address this comment. Also, they will only be allowed to expand the footprint by 1/3, not add on to the front, will be limited by yard requirements except in the rear.
#7349	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09.C. ADAPTIVE REUSE STANDARDS. PERMITTED USES. Table 5.09-1 Commercial Uses -- Permitting all commercial uses except kennels, dry cleaning, convenience store and gas/automotive does not take into consideration the INTENSITY of other use types and impacts to comply with the purpose to "Maintain compatibility of the adaptively reused building or structure with a surrounding neighborhood, community, Place Type, village, or historic district."
#7850	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff	Incorporating how things are approved, e.g. by special exception, and requiring use specific standards to apply should address this comment. Also, they will only

ID	Section
kate.mcconnell@loudoun.gov Date: 1/25/2022	be allowed to expand the footprint by 1/3, not add on to the front, will be limited by yard requirements except in the rear.
#7348	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.09.C. ADAPTIVE REUSE STANDARDS. PERMITTED USES. Table 5.09-1. Lodging Uses -- how will constraints be implemented per ZOAM-2018-0001 (Short Term Residential Rentals/Commercial Whole House) for Adaptive Reuse?
#7851	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/25/2022	If STRR, especially whole house, is classified as a Lodging use, which it likely will be, then it would be allowed. Additional use standards are being proposed. If they are adopted, then they would apply.
#7347	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.09.B.1 & 2. ADAPTIVE REUSE. STANDARDS. LHVA: Historic properties usually can not meet parking standards. It's our understanding that Parking will be handled by Small Area Plans as each situation is unique in RHV, but what happens in the meantime?
#7852	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/25/2022	See Table 5.09-2, Parking.
#7346	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.09.A.4. ADAPTIVE REUSE. APPLICABILITY. LHVA: How does this relate to RHVs/VCOD and small area plans yet to be developed? The building or structure is located in a Priority Commercial Redevelopment Area or qualifies as a redevelopment project pursuant to Section 5.0x.
#7853	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/25/2022	Priority Commercial Redevelopment Areas are designated in the 2019 GP. Redevelopment standards and regulations are to be developed by a consultant, so this is TBD, but generally villages and redevelopment areas are not coincident/the same thing.

ID	Section
#7345	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09.A.3.c. ADAPTIVE REUSE. APPLICABILITY. LHVA: Why is this costly requirement necessary, it only adds more of a deterrent to anyone attempting to save an historic property?
#7854	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	The documentation "may be required." Also, to ensure that not every single building qualifies to be an adaptive reuse project.
#7344	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09.A ADAPTIVE REUSE. APPLICABILITY. LHVA does not see the need for #1, 2, & 5 If the property meets req 3 & 4, what purpose are 1, 2, & 5?
#7856	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	I don't understand this question. There is no 5.
#7343	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09.01. ADAPTIVE REUSE STANDARDS. PURPOSE.. 8th bullet – Renovations per the Secretary of Interior Standards for Rehabilitation?
#7857	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Consulted with Historic Preservation Planner. This proposal creates 2 problems. First, not all adaptive reuse projects should have to (or can) meet the SoIS. Also, it would not be appropriate for County staff to decide if the Standards are met for a project. In addition, properties listed on the National Register are currently not required to meet these standards unless the work is tied to a federal project, such as a permit or tax credit.
#7342	10.05 Adaptive Reuse

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09.01. ADAPTIVE REUSE STANDARDS. PURPOSE. 7th bullet - How does this relate to RHVs/VCOD and small area plans yet to be developed? Increase and improve the variety and affordability of housing stock in locations consistent with the General Plan and where permitted.
#7858	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	It is possible that a building in a village could be adaptively reused to provide affordable housing. Any housing in a village would need to adequately served by public water and sewer and if there is not adequate service, then the residential use would not be feasible.
#7341	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09.01. ADAPTIVE REUSE STANDARDS. PURPOSE. 6th bullet - Generate activity within vacant buildings and underutilized areas. What are the specifics of "generate activity" and "underutilized areas"?
#7872	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Language comes directly from the 2019 GP Infill and Redevelopment Chapter. It means that the purpose of Adaptive Reuse is to start using (activate) vacant and underutilized (not used to it's full potential) buildings.
#7340	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.09.01. ADAPTIVE REUSE STANDARDS. PURPOSE. 5th bullet - How does this relate to RHVs/VCOD and small area plans yet to be developed? Facilitate redevelopment in the priority areas identified on the Priority Commercial Redevelopment Areas Map and other qualifying projects pursuant to Section 5.0x Redevelopment Standards.
#7873	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Priority Commercial Redevelopment Areas have been removed. They will be addressed through redevelopment standards in development by our consultant, so this is TBD, but generally villages and redevelopment areas are not coincident/the same thing.
#7339	10.05 Adaptive Reuse
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com	5.09.01. ADAPTIVE REUSE STANDARDS. PURPOSE. 2nd bullet – What is a Legacy Village Core?

ID	Section
Date:1/16/2022	
#7874	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Legacy Village Cores are designated in the 2019 GP. See Legacy Village Core, Map Number 2019-148 in Chapter 2.
#7338	10.05 Adaptive Reuse
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.09B2a Parking Screening Is clause needed? isn't it covered by the general landscaping requirements? If anything, there should be provisions for reduced standards. The general standards do not require landscaping if there are 10 or fewer parking spaces
#7875	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will revise text to remove repeated requirement, but also to ensure parking is scaled in a manner that is subordinate to the existing building or structure and must be compatible with and not adversely impact the character.
#7336	10.05 Adaptive Reuse
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.09B1a Sometimes don't have any reasonable option except parking in front - Aldie Mill?
#7876	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Provision applies to new parking. The parking referenced in the example currently exists and would not be required to be removed.
#7332	10.05 Adaptive Reuse
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.09A3 b1 & c3 These seem redundant. Could combine
#7877	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov	5.09.B.3.b.1. requires determination of whether a building that is 50+ years old is eligible for listing and if it is, then the adaptive reuse needs to follow certain

ID	Section
Date:1/25/2022	requirements. 5.09.B.3.c.3 states the professional certifications a person needs to meet to provide documentation that may be requested to determine eligibility. They are 2 different things.
#7329	10.05 Adaptive Reuse
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.09A3 Existing Use non-viable Eliminate this criteria. It is just a barrier to re-use. Subjective
#7878	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	It is only one of several criteria that need to be met. The regulation identifies methods to determine if the use is non-viable. We want to be careful not to allow every potential building to be adaptively reused under these criteria. Buildings can be retrofitted for another use permitted in the district where it is located. This is to address buildings important to a community, but hard to retrofit to a use permitted in the district where it's located.
#7328	10.05 Adaptive Reuse
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.09A2 ADAPTIVE REUSE What about free-standing structures that are not within historic districts. Don't we want to preserve these as well?
#7879	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	The building has to meet 1 of the criteria, not all of them. A freestanding structure could be a building in a VCOD/village, a building that is 50+ years old, as well as being a stand alone historic structure/building. Also, these regulations are geared toward reuse of historic buildings. The redevelopment standards to be developed by a consultant will address how non-historic buildings can be reused. We do not want to allow any building to be reused at anytime, especially if it would be more appropriate to be rezoned. Also, if the use is permitted, then they would not have to meet the requirements, the building could simply change uses.
#7254	10.05 Adaptive Reuse
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/16/2022	Why are uses so limited? Shouldn't any use in the underlying zoning district be permitted in adaptive reuse? Why even list the uses at all, unless it is to offer the incentives for certain uses? If that is the goal, make it clear. But do not limit uses that do not seek incentives.
#7880	10.05 Adaptive Reuse

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	If the use is already allowed in the underlying zoning district, then adaptive reuse regulations would not be necessary because they could simply change the use. I edited to make this more clear. The point is to allow other uses in buildings that are not permitted in the district to increase the options for the building (as an adaptive reuse).
#7238	10.05 Adaptive Reuse
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	5.09.A.1.d. I cannot find the "Loudoun County Historic Register." Does such a thing exist?
#7881	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	This was a placeholder and language from the Heritage Preservation Plan. There will be a future proposal to the BOS, likely from the Heritage Commission, to establish a County Historic Register. We will revise the text then to include it in the list.
#7229	10.05 Adaptive Reuse
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/15/2022	A common adaptive reuse in AR districts is to convert a barn into residential. Is that allowed by the language here? If not, is there some reason?
#7882	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	If a residential use is permitted in the district where the barn is located, then conversion from the barn to the residence would be allowed under current regulations. However, we will further evaluate whether it is needed and how to allow the retrofitting of nonconforming lots to allow a new use.
#7228	10.05 Adaptive Reuse
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/15/2022	5.09.B.2. Is it necessary to reference Parking & Lighting Standards? Wouldn't they be required to be met anyway?
#9221	10.05 Adaptive Reuse
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/23/2022	Deleted

ID	Section
#13927	Chapter 10: Nonconformities and Adaptive Reuse
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/18/2022	Language is Section 2.a Nonconforming Lots, should be expanded to include more than just "lot area". if the lot and the development on the lot meets criteria under current ordinance (open space, setbacks, etc.....) and new ZO is more prohibitive, there needs to be a path for these landowners to make adjustments to the property without wholesale alignment with new ordinance.
#9655	Chapter 10: Nonconformities and Adaptive Reuse
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:4/12/2022	9.01.C.3 I read this as an all or nothing provision. Would prefer to see us accept a relocation that does not increase the level of nonconformity.
#13485	9.02 Unmet Housing Needs Unit Program
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	8.02.H Could the covenants add for a provision(s) that would allow the County (or its designee) to purchase/receive those UHNU rental or sale units for ownership and to provide for a shared equity opportunity in the case of "for sale" units?
#13483	9.02 Unmet Housing Needs Unit Program
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	F.1 & 2. Can this be somewhat relaxed to allow more (but not above a certain %) adjacency--particularly in MF buildings?
#13481	9.02 Unmet Housing Needs Unit Program
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	C. Can there be a requirement added that a certain percentage of UHNUs are in the 0-30% AMI? Could these be made available to the county or its designee (i.e. a community land trust) for ownership?
#13462	9.02 Unmet Housing Needs Unit Program
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	8.02.A.2. Should this be pointing to Section 8.01.J-Modifications to the ADU program or K-Affordable Housing Unit (AHU) Programs?
#11104	9.02 Unmet Housing Needs Unit Program

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"8.02.D.5.a UNMET HOUSING NEEDS UNIT PROGRAM - DENSITY BONUS/ADD'L REGULATORY ADJUSTMENT - PD-MUB Zoning District How does the density bonus affect the budget, housing, and population projections? Does this increase counter the guidelines and projections of the 2019 General Plan? 2022 Round 3 Input: Staff commented to ZOC that increasing density is a longstanding practice, especially as an incentive to increase ADUs in the SPA and UPA where increased density is anticipated."
#11103	9.02 Unmet Housing Needs Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"8.02 C.2. UNMET HOUSING NEEDS UNIT PROGRAM: C.2. Does Chapter 1450, as currently written, include provisions on how many UHNUs are to be provided? It is very difficult to review the entire section without that information. Can those calculation formulas be provided? 2022 Round 3 Input: Staff pointed out in response to ZOC that the number of UHNUs required depends on the sub-area or the Residential Design Type where they will be applied. Staff provides the calculations in their response. It would be helpful if these calculations could be included as an example in the DRAFT text."
#11102	9.02 Unmet Housing Needs Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"8.02 C.2. UNMET HOUSING NEEDS UNIT PROGRAM: C.2. Does Chapter 1450, as currently written, include provisions on how many UHNUs are to be provided? It is very difficult to review the entire section without that information. Can those calculation formulas be provided? 2022 Round 3 Input: Staff pointed out in response to ZOC that the number of UHNUs required depends on the sub-area or the Residential Design Type where they will be applied. Staff provides the calculations in their response. It would be helpful if these calculations could be included as an example in the DRAFT text."
#8118	9.02 Unmet Housing Needs Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	C.4.b. UHNU Requirements. Are the required accessible unit percentages across the board (not just for UHNUs) noted in Chapter 1450 of the codified ordinance?
#8156	9.02 Unmet Housing Needs Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	Accessible units are a building code and/or financing program requirement. They are not in 1450. County requirements may be elsewhere in the Codified Ordinances but I'm not sure where.
#8175	9.02 Unmet Housing Needs Unit Program
By: Kate McConnell Tags: staff	This section may need some refinement to clarify intent, which I read a more UHNUs than required are provided and they are accessible.

ID	Section
kate.mcconnell@loudoun.gov Date:2/1/2022	
#8817	9.02 Unmet Housing Needs Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/23/2022	Revised to clarify % of accessible units is higher than required by building code or financing program.
#8117	9.02 Unmet Housing Needs Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	C.3.b. UHNU Requirements Suggest that sales prices for UHNUs for purchase should be controlled for longer than 20 years.
#8157	9.02 Unmet Housing Needs Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	This is a change staff is considering.
#8818	9.02 Unmet Housing Needs Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/23/2022	Office of Housing Staff will be considering revisions to all covenants as part of an amendment to the Section 1450 of the Codified Ordinances. These covenants lengths will be considered at that time.
#8101	9.02 Unmet Housing Needs Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.02.D.6, 7, & 8 UNMET HOUSING NEEDS UNIT PROGRAM - Density Bonus Calculation, Calculation of Required UHNUs. Does adding ADUs to the allowable density create disproportionately create more need for ADUs? In other words, does not an increase in housing density create the need a corresponding exponential need for more affordable housing?
#8158	9.02 Unmet Housing Needs Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	I'm not sure I understand this question.
#8174	9.02 Unmet Housing Needs Unit Program

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/1/2022	I also am not sure I understand the question, but will try to answer what I think it's asking. The PD-MUB standards will include when the UNHUs are required, which is when the density exceeds 20 du/acre, but not if the density is exceeded because ADUs were required. So, it depends. If the density increase provided due to ADUs starts after a project meets 20 du/acre, then it could mean that the additional density will result in a requirement for more ADUs.
#8100	9.02 Unmet Housing Needs Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.02.D.5.a UNMET HOUSING NEEDS UNIT PROGRAM - DENSITY BONUS/ADD'L REGULATORY ADJUSTMENT - PD-MUB Zoning District How does the density bonus affect the budget, housing, and population projections? Does this increase counter the guidelines and projections of the 2019 General Plan?
#8159	9.02 Unmet Housing Needs Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	An optional density increase that exceeds the planned density has been a longstanding practice in the County.
#8173	9.02 Unmet Housing Needs Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/1/2022	In addition, it will only apply if an applicant elects to provide UNHUs as an incentive in certain districts in the SPA and UPA where plan policy anticipates increased density.
#8099	9.02 Unmet Housing Needs Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.02.C.3.a & b UNMET HOUSING NEEDS UNIT PROGRAM - UHNU REQUIREMENTS. Does the County see housing conditions getting better in the future? In other words, why is the control for a finite period of time (i.e., 30 and 20 year control period)?
#8160	9.02 Unmet Housing Needs Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	The control periods are set to ensure that the unit stays affordable and that a buyer cannot sell the unit for a market-rate price in the short-term.
#8098	9.02 Unmet Housing Needs Unit Program
By: Maura Walsh-Copeland Tags: zoc	8.02.C.3 UNMET HOUSING NEEDS PROGRAM. UHNU Requirements point 3. Is a covenant in the land records sufficient protection for a 30 year constrain on

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:1/31/2022</p>	<p>price appreciation? How will that be enforced? What if any are the penalties for not abiding by the covenants?</p>
<p>#8161</p>	<p>9.02 Unmet Housing Needs Unit Program</p>
<p>By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022</p>	<p>Recording a covenant is common practice for enforcing affordability restrictions. The affordability restrictions runs with the land, and is how most affordable homeownership and rental production programs are managed. Chapter 8.01 provides penalties for tenants or owners who do not meet the affordability requirements. Future revisions will add edited ADU Program requirements that would also apply to UHNUs to this section and will include such a provision.</p>
<p>#8097</p>	<p>9.02 Unmet Housing Needs Unit Program</p>
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022</p>	<p>8.02 C.2. UNMET HOUSING NEEDS UNIT PROGRAM: C.2. Does Chapter 1450, as currently written, includes provisions on how many UHNUs are to be provided? It is very difficult to review the entire section without that information. Can those calculation formulas be provided?</p>
<p>#8162</p>	<p>9.02 Unmet Housing Needs Unit Program</p>
<p>By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022</p>	<p>The amount of UHNUs depends on why a project needs to provide them. For FAR in the UM Subarea - it's a 15% requirement. For the SCN alternative criteria, it's 10% for multifamily or 15% for single family. For PD-MUB, it's 6.25%.</p>
<p>#8172</p>	<p>9.02 Unmet Housing Needs Unit Program</p>
<p>By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/1/2022</p>	<p>The sections referenced in 8.02.A.1, 2, 3, and 5 provide the amount of UHNUs required as incentives. They will be linked both ways in the public facing version of EnCode. For 0.2 increase in FAR in UM or SM district, At least 15% of the application's total single family or MF stacked dwelling units are for purchase UHNUs affordable to households in the 71% to 100% of the AMI and/or At least 15% of the application's total MF attached dwelling units are for rent UHNUs affordable to households in the 0% to 30% of the AMI. UHNUs must be provided pursuant to Section 8.02. For 0.1 increase in FAR in UM or SM district, At least 10% of the application's total dwelling units are for rent UHNUs affordable to households in the 0% to 30% AMI. As noted in 8.01 response - staff is coordinating with Community Planning regarding SCN locational criteria and CPAM for revising this criteria.</p>
<p>#8096</p>	<p>9.02 Unmet Housing Needs Unit Program</p>
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com</p>	<p>8.02 UNMET HOUSING NEEDS UNIT PROGRAM. PURPOSE: bullet one creates two parts of the AMI to be the focus (under 30% and 70% to 100% of AMI). Although not directly a zoning issue, is it the intent for (or should) the county subsidies and funds be used for those households already capable of</p>

ID	Section
Date:1/31/2022	renting market rate housing? Is the County's objective to provide "safe, decent, and sanitary" housing to all or to facilitate wealth accumulation for upwardly mobile young families?
#8163	9.02 Unmet Housing Needs Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	The intent is to provide 0-30% rental units which is the area of greatest housing need in the County and to provide 70-100% homeownership units as families earning even 100% AMI cannot afford to purchase a home in the County. The UHNSP describes why affordable homeownership is also an important policy goal. Also, unmet housing needs range from 0-100% of AMI in the County.
#8095	9.02 Unmet Housing Needs Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.02 UNMET HOUSING NEEDS UNIT PROGRAM. PURPOSE: bullet one creates the impression that there are two separate programs. Is this the intention or should the County be clear there is one Attainable Housing program with separate program implementations?
#8164	9.02 Unmet Housing Needs Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	The intent is to bring attainable housing programs together for the first time in the ordinance. ADUs are required, and UHNUS are optional, depending on how the developer is choosing to apply the ordinance so they are two separate programs.
#8073	9.02 Unmet Housing Needs Unit Program
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/30/2022	Are density increases in 8.02 in addition to those listed in 8.01? If not can a developer substitute UHNU's for ADU's? Can this be clarified in the text?
#8176	9.02 Unmet Housing Needs Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/1/2022	The only time this would occur is in PD-MUB. See response to Comment 8101 (Comment 8174). The standard UHNU program is related to FAR increase in SM or UM districts or locational criteria for SCN district, so there is no dwelling unit per acre density increase.
#13450	9.01 Affordable Dwelling Unit Program
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	H.2. As long as all ADU units are not clustered on a single floor or only in one building, can these regulations be somewhat relaxed? Seems overly restrictive.

ID	Section
#13426	9.01 Affordable Dwelling Unit Program
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	J.6.c. Strongly support land in lieu, but not cash in lieu, now that the county has a dedicated funding stream for affordable housing. Strike references to cash-in-lieu.
#13414	9.01 Affordable Dwelling Unit Program
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	8.01.3, 4 and 5 The bonus density allowed in every case should match the percentage of ADUs provided (10% or 15%) as provided in 8.01.6
#13390	9.01 Affordable Dwelling Unit Program
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	8.01.B.2 A link to Chapter 1450 of the codified ordinance would be helpful.
#13384	9.01 Affordable Dwelling Unit Program
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	8.01.A.6 Should clarify that "for sale" ADU units can only be substituted with "for sale" AHU units and that the minimum price-controlled timeframe is longer than that for ADU units.
#13357	9.01 Affordable Dwelling Unit Program
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	A.4.a Strongly support eliminating the exception of 4+ story buildings with an elevator from the ADU requirement.
#11101	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"8.01 K.5.d.1. AFFORDABLE HOUSING UNIT (AHU) PROGRAM: 5.d.1. In an AHU project, building plans and elevations are prepared in parallel with other entitlement steps. It is not reasonable to demand that architectural plans be complete to a high level of detail, sufficient to confirm "substantial conformance" before other key steps can proceed. Instead, can/will Staff revise this so that the Zoning Administrator must confirm "substantial conformance" (via an informal determination) prior to the issuance of Building Permits? 2022 Round 3 Input: In cases where the Zoning Administrator is required to opine on substantial conformance to design guidelines, the deadline for that opinion must be before the issuance of Building Permits for the AHUs. Staff comment to ZOC

ID	Section
	<p>that it is standard practice to demonstrate compliance with material requirements at the time of Site Plan approval. However, recent experience at Building and Development has shown that tying this approval to Site Plans or Subdivision Plats can inadvertently mess up the AHU funding approval process at Virginia Housing. This is especially true for 4% Bond Deals, which run on a different approval schedule at Virginia Housing than do 9% or Hybrid deals. Please consult with B&D staff as part of rewriting this part of the DRAFT Ordinance."</p>
#11100	9.01 Affordable Dwelling Unit Program
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"8.01 K.5.d. AFFORDABLE HOUSING UNIT (AHU) PROGRAM: 5.d. In the case of AHU funding provided by Virginia Housing, each project must meet minimum building standards required by Virginia Housing and, in many cases, meet even higher standards for building materials used in order to win points in the funding competition. Per AHU experts, in some cases, these materials are of higher quality than materials used by the market rate developer. It is not reasonable to require ""similar"" building materials from both developers.</p> <p>In cases where the master developer has proffered design criteria or sample elevations, it is reasonable to require that the ADU building(s) be in ""substantial conformance with the proffered design guidelines."" However, in instances where there are no proffered design guidelines, this requirement cannot be implemented. AHU funders will not close on any project that requires future approval (or not) by County officials against unspecified design guidelines. 2022 Round 3 Input: The recent revision of this text recognizes that exterior building materials used in AHUs may be similar to or superior to the exterior materials used by the market rate developer. However, staff has not proposed any language to clarify how the Zoning Administrator may assess ""an architectural style compatible with the market rate dwelling units within the development"" if the master developer has not proffered any design guidelines. Virginia Housing will not allow this to be open ended. The text must clarify that if no design guidelines are proffered that no design approval is required from the Zoning Administrator. However, if design guidelines are proffered, approval of ""compatibility"" must be provided by the Zoning Administrator prior to the issuance of the AHU Building Permits."</p>
#11099	9.01 Affordable Dwelling Unit Program
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"8.01 K.5.b.4. AFFORDABLE HOUSING UNIT (AHU) PROGRAM: 5.b.4. If, as proposed, the county permits proof of AHU funding be sufficient to release the Market Rate developer from any further linkages between AHU and Market Rate Occupancy Permits, then the level of reporting required for each Market Rate Occupancy Permit is very burdensome both for the applicant and for staff and unnecessary. Can the county eliminate this reporting completely and if not, why not?</p> <p>2022 Round 3 Input: Staff's concern is that AHUs actually be provided. As stated in the comment above, production of the AHUs is the responsibility of the AHU contractor responding to the requirements of the AHU funding program. The master developer has no part of this relationship. If the County wishes to have progress reports, they should be from the AHU developer."</p>

ID	Section
#11098	9.01 Affordable Dwelling Unit Program
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"8.01 K.5.b. AFFORDABLE HOUSING UNIT (AHU) PROGRAM 5.b. Attainable units provided with AHU funding are typically in one building or, at most, two. The ""linkages"" proposed here, between AHU Occupancy Permits and Market Rate Occupancy Permits are an artifact of when ADUs were provided by the developer as affordable for-sale units within a market rate development. In AHU buildings, Occupancy Permits go from 0% to 100% within 2-3 months. When an AHU building receives funding, construction and occupancy are on a schedule set by the AHU funder. As proposed in Section K.5.c (below) AHUs are verified when the applicant provides proof of funding to the Zoning Administrator. The Market Rate developer no longer has any control over the delivery of the AHUs. Therefore -- Why not let proof of AHU funding be sufficient to release the Market Rate developer from any further linkages between AHU and Market Rate Occupancy Permits? 2022 Round 3 Input: The current DRAFT of Section 8.01.K.5.a. and c. is based upon a view looking backward to lessons learned from the County's administration of the County ADU program and does not reflect the realities of building AHUs with state and Federal funds. These sections need to be redrafted based on more detailed discussions of how Virginia Housing, HUD, and other state and Federal programs work. Consider the following three key points: 1) It is reasonable and fair to require the master developer to be responsible for providing ADUs until the AHU financing is closed and Federal funds begin to flow. It is true that the ""allocation"" of funds does not confirm that AHUs will be delivered. Prior to closing, the AHU deal can still fall apart. For this reason, section K.5.a. should be revised to read....""The applicant must provide proof of closing....including state or Federal funding....."" 2) However, once this closing occurs, and state or Federal funds begin to flow, the milestones and schedules of those state and federal program administrators take over and the master developer no longer has any control whatsoever of the AHU project. At this point, it is unreasonable and unfair to require any linkage between the master developer's Occupancy Permits and the AHU's Occupancy Permits. 3) So, what assurance does the County have that the AHUs will be provided? Take, for example, Virginia Housing. They now require a Letter of Credit from the project's General Contractor insuring completion. This is far more restrictive even than Performance Bonds, which the County still requires. If the General Contractor fails, Virginia Housing exercises the Letter of Credit and finishes the project. Because Federal funds have been expended, the County can be assured that Virginia Housing will not allow anything to happen that might reflect badly on them. For this reason, Section 5.c. should be removed from the DRAFT Ordinance. "</p>
#11097	9.01 Affordable Dwelling Unit Program
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"8.01.J.6.c. AFFORDABLE DWELLING UNIT PROGRAM. MODIFICATIONS. The implication appears to that land made available in lieu of ADU's would be utilized at the same density. Assuming this land could be sold to an alternative affordable housing developer, should a potential increase in density be allowed? 2022 Round 3 Input: Staff respond to ZOC that donating land in lieu of units is allowed only in single family detached (SFD) situations. This appears to limit it as a strategy to increase ADUs. This topic deserves more discussion as others in the community believe it is an ADU/AHU strategy worth pursuing."</p>

ID	Section
#11096	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"8.01.J.4 AFFORDABLE DWELLING UNIT PROGRAM. MODIFICATIONS. The text is somewhat ambiguous: "The Board of Supervisors must find, upon recommendation of the Planning Commission..." This suggests that the Board must follow the recommendations of the Planning Commission which is not correct. Suggest new language:"...after consideration of the recommendation of the Planning Commission..." 2022 Round 3 Input: Staff responds that this comment was under consideration before the 4/18/22 draft text. To date, language in the original DRAFT remains unchanged, but should be reviewed/considered before the second draft."
#11095	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"8.01.H.3 AFFORDABLE DWELLING UNIT PROGRAM. Are the requirements for "dispersion" of ADU's within a project so restrictive that they limit good overall design options and add to construction costs? Is there any analysis on the proposed regulations as to cost and design limitations? 2022 Round 3 Input: Staff responded to ZOC that dispersion has been a longstanding regulation in the ADU Ordinance (though it does not apply to AHUs) and was further clarified by a memo dating back to 2007. However, to date, staff has provided no analysis of the impact of ""dispersion"" requirements on either good design or cost of construction. Nor has there been any analysis of the funding lost from Virginia Housing, and other funders, because of the policy of dispersion. This is a topic which deserves further analysis. How/will this analysis be done before finalizing ZOR and if so when?"
#11094	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"8.01.H.1 AFFORDABLE DWELLING UNIT PROGRAM, Approved Site Plans & Subdivision Plans. Should the ordinance empower ADUAB, an advisory body, to set the specifications without some form of review or appeal process? 2022 Round 3 Input: Staff commented in the responses to ZOC that they will consult with the Office of Housing and Community Development. What is the outcome and how/will it have any impact on Draft Zoning Ordinance text?"
#11093	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"8.01.A.4. AFFORDABLE DWELLING UNIT PROGRAM, APPLICABILITY, EXEMPTIONS. What factual grounds have been established to justify the proposed "Exemptions"? 2022 Round 3 Input: The Loudoun Board of Supervisors requested and TLUC has received and reviewed a study about the impact on developers of removing the current exemption for 4-story, elevator residential buildings from the requirement to provide 6.25% ADUs. However, at the TLUC discussion, Board members asked that this study be extended to look at the impact of removing the exemption to provide 10% ADUs, as proposed in this Zoning Ordinance rewrite. That study has not yet been provided, so this item must remain open pending that study."

ID	Section
#11092	9.01 Affordable Dwelling Unit Program
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"8.01 AFFORDABLE DWELLING UNIT PROGRAM, PURPOSE. The last bullet in Purpose refers to "areas currently served by or planned for mass transit and proximate to major employment centers." Why is there this limitation placed on project location when the objective is to maximize the total number of attainable housing in Loudoun? How can it be justified to require private developers to provide affordable housing in their projects wherever they are located at the same time limiting the location of one type of affordable housing to these very small land areas? 2022 Round 3 Input: This line in the statement of ""Purpose"" is implemented not here, in Section 8.0, but in other sections of the Zoning Ordinance. For example, in Table 2.02.01-3 Dwelling Unit Type Mix, it appears very clear in Reference 5 that SCN-24, with 100% ""Attached Multifamily,"" is a very likely place to put ADUs/AHUs. However, a few lines later in Section 2.02.02 L., Criteria 2 makes it clear these multifamily units must be ""located within 1/2 mile of a mixed use development or along a transit corridor...."" This application of distance limitations will greatly reduce the land available for the construction of ADUs/AHUs, which is contrary to the stated purpose, throughout Chapter 8, of increasing the number of ADUs/AHUs. This proposed language must be further discussed, and impacts quantified, before it is accepted into the final Ordinance."</p>
#11091	9.01 Affordable Dwelling Unit Program
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"8.01. AFFORDABLE DWELLING UNIT PROGRAM. Have the proposed specific requirements of when, where, and how many "attainable housing units" are required from the private sector development applications been analyzed as to their cost and impact on overall project costs? 2022 Round 3 Input: To date, the County has hired a consultant to study and report on the cost burden on housing developers of eliminating the ADU exemption for 4-story, elevator buildings. However, as requested in this comment, staff has so far provided no study of the cost burden on housing developers of implementing this Zoning Ordinance rewrite. Staff did comment that they have requested data from developers to do this type of analysis but, so far, have not been successful in getting that data. How and will this be completed before ZOR is approved?"</p>
#11090	9.01 Affordable Dwelling Unit Program
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"Comment from knowledgeable resident: "c. Simplifying the Zoning Ordinance to make it more user friendly." This section of the rewrite could not be further from that goal. 2022 Round 3 Input: Although the new software platform, enCodePlus, does provides a more user friendly GUI (graphical user interface) than the current 1100 page pdf document, the content for this chapter is more complex than the current Ordinance. "</p>
#11089	9.01 Affordable Dwelling Unit Program

ID	Section
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"8.01 ATTAINABLE HOUSING -- PARKING. 5.05.03 C. PARKING REQUIREMENTS FOR ADUS, USE & POLICY AREA. When discussing Parking Ratios previously for Chapter 5 (Dev. Stds, Parking), the discussion of Parking Ratios for ADUs/AHUs was put off until the drafting of Section 8.01. This important component is missing from this draft for review and discussion. When will proposed text for Parking Ratios for ADU/AHU buildings be presented? 2022 Round 3 Input: Staff has attempted to address this issue in Section 5.05.08 I. However, when the percent reductions presented in this section are applied to the Parking Ratios presented in Table 5.05.134-1, the resulting effect is so de minimis as to not at all reflect the true and measured parking ratios that apply to ADUs/AHUs.</p> <p>Consider this example For a 100-unit, 4% Bond Deal in the Suburban Policy Area with 20 1-BR units, 60 2-BR units, and 20 3-BR units. Applying the ""Minimum"" Parking Ratios from Table 5.05.134-1 would result in requiring 200 parking spaces for this property. Because this is a Bond Deal, all units will be affordable at 60% AMI. Applying the allowed parking reduction from Section 5.05.08.I (5%) to the required 200 parking spaces, would result in the reduction of 10 parking spaces. The Parking Ratio would be reduced from 2.0 parking spaces per DU to 1.9 spaces/DU.</p> <p>In contrast to this, actual application results include: A Parking Study submitted to the Board of Supervisors resulting in their approval of a reduction to 1.5 parking spaces/DU for an AHU project (M. Capretti). Further, a Parking Study put on records of three constructed AHU projects in Loudoun County, with over 300 dwelling units, where the average Parking Ration is 1.2 parking spaces/DU (K. Hart). Finally, the current 5th Edition of the Parking Generation Manual, published by the Institute of Transportation Engineers (ITE) states that for Land Use Code 223 (Affordable Housing) the Parking Demand Ration (parking spaces/DU) should be 0.99. Clearly this topic requires further review and further revision to the proposed Zoning Ordinance."</p>
#8357	9.01 Affordable Dwelling Unit Program
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:2/9/2022</p>	<p>8.01 C. As drafted, this section briefly says who is eligible (which is defined as income in a designated range of percentages of AMI,) and then prescribes what ADU units look like, how many there'll be, etc. The section DOES NOT DEFINE AFFORDABILITY. For home purchases, affordability is usually defined as mortgage payments that do not exceed 30% of gross income. Mortgage payments, in turn, vary according to market interest rates. Suggested language: "Affordable' shall mean a purchase price of a home that results in a monthly mortgage payment that is equal or less than 30% of the eligible buyer's monthly income." Note that this can vary if there is an equity contribution. There may also be public policy benefits of requiring at least nominal down payments, such as 2% of the purchase price.</p>
#8783	9.01 Affordable Dwelling Unit Program
<p>By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/22/2022</p>	<p>For consistency with the UHNU regulations, I revised the heading of Section 8.01.C from "Affordability Requirements" to "ADU Program Income Requirements" (Section 8.02.B is "UHNU Program Income Requirements"). Your question did make me realize that the initial heading name did not accurately reflect the regulation. Since the term "affordability" has been removed from the text, there is no reason to define it in the zoning ordinance.</p>

ID	Section
#8180	9.01 Affordable Dwelling Unit Program
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:2/2/2022	8.01.H.3 states ADU's **MUST** only have one in each stick or row. This language creates no flexibility. Plus if the stick or row has over 8 units you start to reach a point that you can not meet the ordinance as far as number of units required. By codifying a policy or current standard this creates an impossibility. Affordable units may work well in the situation of more than one per building. It happens now. Especially in stacked buildings. The flexibility of the current program can not be codified to an absolute MUST. Continue to provide the flexibility of today. Don't change the results of the current program.
#8189	9.01 Affordable Dwelling Unit Program
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:2/5/2022	Noted. Staff will take this feedback under consideration.
#8234	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/8/2022	Included options that can be used to meet interspersions and compatibility requirements. These options come from the ADU Design Program Book developed by ADUAB and approved by the BOS on July 15, 2015 to be implemented as an administrative tool under the Zoning and Codified Ordinances.
#8179	9.01 Affordable Dwelling Unit Program
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:2/2/2022	8.01.H.2 states ADU's **MUST** be similar in mass, size, shape, etc. to market units. The list is all encompassing. To the point this language is basically saying an ADU must be the same as the market rate units. By codifying a policy or current standard this creates an impossibility. Affordable units can not be the same or they won't be affordable. The flexibility of the current program can not be codified to a must.
#8190	9.01 Affordable Dwelling Unit Program
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:2/5/2022	Noted. Staff will take this feedback under consideration.
#8233	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/8/2022	Included options that can be used to meet interspersions and compatibility requirements. These options come from the ADU Design Program Book developed by ADUAB and approved by the BOS on July 15, 2015 to be implemented as an administrative tool under the Zoning and Codified Ordinances.

ID	Section
#8114	9.01 Affordable Dwelling Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	J. Modifications (second 7) Perhaps this could be modified, i.e. If a modification to section 8.01.H is requested:
#9308	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/29/2022	Addressed
#8113	9.01 Affordable Dwelling Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	J.Modifications--Numbering is off. After 9.e, it jumps back to 7.
#8120	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	This is correct Section 8.01.J.6.c.9.e vs 8.01.J.7
#8112	9.01 Affordable Dwelling Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	J.7.Modifications Again, suggest removing cash-in-lieu and expand the types of housing applications that can provide land.
#8122	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	Cash in lieu is only for SFD ONLY developments. This option has rarely been used in the past. We revised buyout with ZOAM approved in 2020 to an amount that does not incentivize buyout. We are ok with giving a developer options.
#8111	9.01 Affordable Dwelling Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	J.6.c. Modifications Consider removing all references to cash-in-lieu and stick with developable land. Add reference to any land criteria--i.e. not on moderate or very steep slopes, not in floodplain or otherwise hard to develop locations, etc.

ID	Section
#8121	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	See previous comment for response on cash in lieu. Any land dedication would have to demonstrate the required # ADUs can be developed will address this. It will have to meet all other regulations, e.g. steeps slopes, FOD. We do not need to state this.
#8110	9.01 Affordable Dwelling Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	J.6.a Modifications I realize this may make sense to those who provide ADUs, but I am having trouble understanding both the description of changes to this section, and the section itself. Please consider providing examples like you did above in sample calculations, or in what a creative design might be?
#8123	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	Good suggestion. Will revise to include an example.
#8109	9.01 Affordable Dwelling Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	E.2.c. Standards for ADU Calculations. Recommend that the provision of land (minus the cash-in-lieu provision) be an option for SFA, MF stacked and MF attached housing types as well.
#8168	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	Will consider suggestion.
#8784	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/22/2022	Consulted with Office of Housing. The ADU Program for these unit types is successful as is. Also, we incorporated the flexibility to provide AHUs if for sale units do not work for the developer.
#8107	9.01 Affordable Dwelling Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	E.2.c. Standards for ADU Calculations. Assume that 8.01.1.6.c is coming? Recommend that cash-in-lieu option be struck, while keeping provision of land. The County has more options with provision of land. The County can and should do more to partner/participate in a community land trust that can keep housing

ID	Section
	affordable in perpetuity. Owning the land base for affordable housing makes that a possibility.
#8143	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	Will consider further, but initial thought is that we would like to provide options to the developer. This will only apply in SFD only developments.
#8785	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/22/2022	Consulted with Office of Housing, and preference is to give developer options.
#8106	9.01 Affordable Dwelling Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	Table 8.01.d-1. and E.2.a Standards for ADU Calculations. A footnote in the table that references E.2.a could help orient the reader that there's more relevant information following.
#8126	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	Will consider suggestion.
#8241	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/8/2022	Since this table is only for density increase, it would not be appropriate to add a footnote about calculating required ADUs.
#8105	9.01 Affordable Dwelling Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	Table 8.01.D-1. What are the projected density ranges for UT/UM and SM FAR limits?
#8125	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov	We are calculating MF attached density using FAR in accordance with 2019 GP Policy. I will discuss anticipated density further with Community Planning, but I

ID	Section
Date:1/31/2022	imagine a maximum number of dwelling units will have to be provided at the time of rezoning for tracking and CIF purposes.
#8242	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/8/2022	Max number of units will have to be provided at the time of rezoning. Regulating MF attached by FAR will only apply to UT/UM and SM zoning districts.
#8104	9.01 Affordable Dwelling Unit Program
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/31/2022	A.Applicability f.4.a. Kate, thank you for your explanation of why this exemption is still in place. This is a valuable opportunity to get affordable units intermixed with market rate units that should be included.
#9309	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/29/2022	Acknowledged
#8094	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.01.L. AFFORDABLE DWELLING UNIT PROGRAM. VIOLATIONS AND PENALTIES. All the penalties listed essentially provide no disincentive to the applicants as they are no worse off than their previous situation. Why are there no cash fines or other penalties included? Are they included in Chapter 7?
#8124	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	This comment is not related to implementing the 2019 GP. However, penalties are located in a different section of the ordinance (new section TBD) and maximums are mandated by state code.
#8093	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.01 K.5.d.1. AFFORDABLE HOUSING UNIT (AHU) PROGRAM: 5.d.1. In an AHU project, building plans and elevations are prepared in parallel with other entitlement steps. It is not reasonable to demand that architectural plans be complete to a high level of detail, sufficient to confirm "substantial conformance" before other key steps can proceed. Instead, can/will Staff revise this so that the Zoning Administrator must confirm "substantial conformance" (via an informal determination) prior to the issuance of Building Permits?

ID	Section
#8127	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	It is standard practice for applications with materials requirements and/or commitments to demonstrate this type of information at site plan.
#8092	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	"8.01 K.5.d. AFFORDABLE HOUSING UNIT (AHU) PROGRAM: 5.d. In the case of AHU funding provided by Virginia Housing, each project must meet minimum building standards required by Virginia Housing and, in many cases, meet even higher standards for building materials used in order to win points in the funding competition. Per AHU experts, in some cases, these materials are of higher quality than materials used by the market rate developer. It is not reasonable to require ""similar"" building materials from both developers. In cases where the master developer has proffered design criteria or sample elevations, it is reasonable to require that the ADU building(s) be in ""substantial conformance with the proffered design guidelines."" However, in instances where there are no proffered design guidelines, this requirement cannot be implemented. AHU funders will not close on any project that requires future approval (or not) by County officials against unspecified design guidelines."
#8128	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	This comment is not related to implementing the 2019 GP. However, will consider adding phrase that exterior building materials are similar to or higher quality than the market rate dwelling units to address this concern. The applicant will already know if they are receiving funding when they apply for a site plan, so they should know what is expected by the program providing the funding. Meanwhile, the County needs assurances that a quality product will be provided.
#8140	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	We're suggesting additional programs that could count which would not all require VH financing/LIHTC. This language is to ensure quality of the AHUs. Could consider how to add a little more flexibility.
#8091	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.01 K.5.b.4. AFFORDABLE HOUSING UNIT (AHU) PROGRAM: 5.b.4. If, as proposed, the county permits proof of AHU funding be sufficient to release the Market Rate developer from any further linkages between AHU and Market Rate Occupancy Permits, then the level of reporting required for each Market Rate Occupancy Permit is very burdensome both for the applicant and for staff and unnecessary. Can the county eliminate this reporting completely and if not, why not?
#8129	9.01 Affordable Dwelling Unit Program

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/31/2022	This comment is not related to implementing the 2019 GP. However, ensuring AHUs are delivered as the market rate development builds out is critical to ensuring that required affordable units are provided. A simple approval does not provide the County with a sufficient assurance that AHUs will be provided, regardless of any contractual obligations related to the provision of AHUs.
#8090	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/31/2022	"8.01 K.5.b. AFFORDABLE HOUSING UNIT (AHU) PROGRAM 5.b. Attainable units provided with AHU funding are typically in one building or, at most, two. The ""linkages"" proposed here, between AHU Occupancy Permits and Market Rate Occupancy Permits are an artifact of when ADUs were provided by the developer as affordable for-sale units within a market rate development. In AHU buildings, Occupancy Permits go from 0% to 100% within 2-3 months. When an AHU building receives funding, construction and occupancy are on a schedule set by the AHU funder. As proposed in Section K.5.c (below) AHUs are verified when the applicant provides proof of funding to the Zoning Administrator. The Market Rate developer no longer has any control over the delivery of the AHUs. Therefore -- Why not let proof of AHU funding be sufficient to release the Market Rate developer from any further linkages between AHU and Market Rate Occupancy Permits?"
#8130	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/31/2022	This comment is not related to implementing the 2019 GP. However, ensuring AHUs are delivered as the market rate development builds out is critical to ensuring that required affordable units are provided. A simple approval does not provide the County with a sufficient assurance that AHUs will be delivered, regardless of any contractual obligations related to the provision of AHUs. If a development/er wants to meet their ADU requirement by substituting AHUs, then part of their process will be ensuring AHUs are delivered in a way that meets the requirement. Also, K.5.c. acts as an initial check for the County and is only one step in demonstrating the intent to provide AHUs (at site plan). It does not ensure delivery of the units.
#8089	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/31/2022	8.01.J.6.c.4 AFFORDABLE DWELLING UNIT PROGRAM - MODIFICATIONS. How can/will the County assure that the environmental impact of the land will follow the protocol for the applicable section of the 2019 General Plan?
#8131	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/31/2022	All applications will have to follow environmental regulations included in the Zoning Ordinance. A requirement repeating this does not need to be stated here. Legislative applications are also reviewed for consistency with the 2019 GP.

ID	Section
#8088	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/31/2022	8.01.J.6.c.3. ATTAINABLE HOUSING. MODIFICATIONS. States "construction cost of a prototypical SFD ADU must be the "vertical cost" of an ADU as established on a semiannual basis by the ADUAB." Where is this information made available on a semiannual basis?
#8132	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/31/2022	This comment is not related to 2019 GP Policy. However, ADUAB determines the vertical costs and it is available in the staff reports/minutes/reports associated with determining the vertical cost, as well as upon request.
#8087	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/31/2022	8.01.J.6.c. AFFORDABLE DWELLING UNIT PROGRAM. MODIFICATIONS. The implication appears to that land made available in lieu of ADU's would be utilized at the same density. Assuming this land could be sold to an alternative affordable housing developer, should a potential increase in density be allowed?
#8133	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/31/2022	Not likely because the only time land in lieu of units is allowed is when the development of single family detached (SFD) only. Based on the development pattern of the County, the only time SFD development will occur will be when that is the only unit type permitted, typically in a by-right development, and would not be subject to a rezoning.
#8086	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/31/2022	8.01.J.6.c. AFFORDABLE DWELLING UNIT PROGRAM. MODIFICATIONS. Can the applicant propose land for affordable housing that is not contiguous to their market rate project? If not, why not?
#8134	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/31/2022	The land should be in the development using the provision. Providing land in another location could result in consolidating affordable units in one location. It would also be overly complicated logistically since the offsite land should have to have all approvals and entitlements in place; this responsibility should not be placed on the County or some other organization that would development the land. Additionally, without entitlements in place, the County has no assurance they can or will be obtained.
#8142	9.01 Affordable Dwelling Unit Program

ID	Section
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	Agreed - also we want affordable housing integrated into communities. If off-site is allowed, integration would be much harder to achieve.
#8085	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	"8.01.J.4 AFFORDABLE DWELLING UNIT PROGRAM. MODIFICATIONS. The text is somewhat ambiguous: "The Board of Supervisors must find, upon recommendation of the Planning Commission..." This suggests that the Board must follow the recommendations of the Planning Commission which is not correct. Suggest new language: "...after consideration of the recommendation of the Planning Commission..."
#8135	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	Will consider revision.
#8084	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.01.H.3 AFFORDABLE DWELLING UNIT PROGRAM. Are the requirements for "dispersion" of ADU's within a project so restrictive that they limit good overall design options and add to construction costs? Is there any analysis on the proposed regulations as to cost and design limitations?
#8136	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	This comment is not related to 2019 GP Policy. However, this has been a longstanding regulation and is not proposed for deletion. Further, staff included regulations that have been applied through a memo of clarification since at least 2007. And, we will be developing additional language re: the consideration of case by case creative design and alternative dwelling unit types.
#8083	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.01.H.1 AFFORDABLE DWELLING UNIT PROGRAM, Approved Site Plans & Subdivision Plans. Should the ordinance empower ADUAB, an advisory body, to set the specifications without some form of review or appeal process?
#8138	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff	Comment not related to 2019 GP Policy. Will consider in consultation with Office of Housing and Community Planning staff.

ID	Section
<p>kate.mcconnell@loudoun.gov Date:1/31/2022</p>	
#8141	9.01 Affordable Dwelling Unit Program
<p>By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022</p>	Agreed - not related to 2019 GP. In case it's helpful though, there's a public comment opportunity at every ADUAB meeting.
#8786	9.01 Affordable Dwelling Unit Program
<p>By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/22/2022</p>	Deleted referenced section. It is outdated since affordability is now determined by AMI.
#8082	9.01 Affordable Dwelling Unit Program
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022</p>	8.01.E.2.c. AFFORDABLE DWELLING UNIT PROGRAM - STANDARDS FOR ADU CALCULATION. How can/will the County assure the locations of the donated land will not negatively impact the quality of life of the clients by being proximate to data centers? Reference: Washington Business Journal: www.bizjournals.com/washington/news/2022/01/28/loudoun-county-development-plan.html
#8137	9.01 Affordable Dwelling Unit Program
<p>By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022</p>	If a residential development is permitted proximate to data centers, then the development could include ADUs. Any additional Use Specific Standards that would apply if a data center is adjoining a residential property would apply.
#8081	9.01 Affordable Dwelling Unit Program
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022</p>	8.01.D.4. AFFORDABLE DWELLING UNIT PROGRAM, ADU Requirements and Optional Increases in Density for MF Attached Dwelling Units: There has been confusion on this point at recent TLUC meetings. This text makes it clear that the required number of ADUs for this building type is 10% (and not 10% on top of the previous ADU requirement). With this requirement clear, how are developers expected to reach the goal of 20% ADUs per project, as stated in the UHN Strategic Plan?
#8144	9.01 Affordable Dwelling Unit Program
<p>By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022</p>	TLUC has recently been discussing the Suburban Compact Neighborhood place type and when developers choose to apply it, what criteria they need to meet. The upcoming item on Feb. 16 at TLUC will clarify the affordable units expected. These revisions increase the ADU requirement for residential development of 24 units or more to 15% for single family or 10% for multifamily. This will be an

ID	Section
	ongoing discussion that Zoning Staff is aware of and will coordinate with Community Planning as the CPAM progresses. The UHNSP sets a goal of 20% affordable units. This is not ADUs only but within the spectrum from 0-100% AMI. The UHNSP does not make this 20% goal a requirement of all residential development applications.
#8080	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/31/2022	8.01.D.3. AFFORDABLE DWELLING UNIT PROGRAM, ADU Requirements and Optional Increases in Density for SFD, SFA and MF Stacked Dwelling Units: There has been confusion on this point at recent TLUC meetings. This text makes it clear that the required number of ADUs for these building types is 15% (and not 15% on top of the previous ADU requirement). With this requirement clear, how are developers expected to reach the goal of 20% ADUs per project, as stated in the UHN Strategic Plan?
#8145	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date: 2/1/2022	TLUC has recently been discussing the Suburban Compact Neighborhood place type and when developers choose to apply it, what criteria they need to meet. The upcoming item on Feb. 16 at TLUC will clarify the affordable units expected. These revisions increase the ADU requirement for residential development of 24 units or more to 15% for single family or 10% for multifamily. This will be an ongoing discussion that Zoning Staff is aware of and will coordinate with Community Planning as the CPAM progresses. The UHNSP sets a goal of 20% affordable units. This is not ADUs only but within the spectrum from 0-100% AMI. The UHNSP does not make this 20% goal a requirement of all residential development applications.
#8079	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/31/2022	8.01.D AFFORDABLE DWELLING UNIT PROGRAM, ADU Requirements and Optional Increases in Density. Has any analysis been done to compare the “life time cost” of the market rate house allowed through increased density with the value of the ADU? Would it be cheaper for the County and taxpayers to provide alternative incentives to increase ADU’s without increasing density beyond the limits of the Loudoun 2019 Plan Place Type?
#8149	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date: 2/1/2022	1) Not sure I understand the question and 2) The state enabling legislation only allows an ADU program that provides for an optional density increase. Therefore, density increase is the only incentive the County is allowed to use. And an optional density increase that exceeds the planned density has been a longstanding practice in the County.
#8078	9.01 Affordable Dwelling Unit Program

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.01.A.4. AFFORDABLE DWELLING UNIT PROGRAM, APPLICABILITY, EXEMPTIONS. What factual grounds have been established to justify the proposed "Exemptions"?
#8139	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/31/2022	This comment is not related to implementing 2019 GP Policy. However, when time is available, staff is intending to revisit the exemptions to determine if all of the exemptions are still necessary.
#8077	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.01 AFFORDABLE DWELLING UNIT PROGRAM, PURPOSE. The last bullet in Purpose refers to "areas currently served by or planned for mass transit and proximate to major employment centers." Why is there this limitation placed on project location when the objective is to maximize the total number of attainable housing in Loudoun? How can it be justified to require private developers to provide affordable housing in their projects wherever they are located at the same time limiting the location of one type of affordable housing to these very small land areas?
#8146	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	This is language to implement the 2019 GP and UHNSP. Additionally, the program has 7 items specified as part of the program purpose. It is not solely about location and ADU requirements are not limited to developments near mass transit or employment. However, as these are areas where future development is planned, this addition makes it clear that ADUs are a County priority for residential development in those areas.
#8076	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.01. AFFORDABLE DWELLING UNIT PROGRAM, PURPOSE. The bullet points in the PURPOSE refer to "moderate" income and "moderately priced dwelling units," and the last bullet refers to housing for between 30% and 70% of AMI. Is there are a difference in the AMI target between "moderate" priced housing and income and the 30%-70% range listed? If so, what is the difference?
#8147	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	To meet ADU requirements, developers can provide ADUs for rent at 30-50% AMI OR for homeownership at 50-70% AMI. The ADU rental units serve a lower income group.
#8171	9.01 Affordable Dwelling Unit Program

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/1/2022	2nd bullet (moderate income) comes from state code. Income ranges the County has been using since inception of the ADU Program address this income.
#8075	9.01 Affordable Dwelling Unit Program
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022	8.01. AFFORDABLE DWELLING UNIT PROGRAM. Have the proposed specific requirements of when, where, and how many “attainable housing units” are required from the private sector development applications been analyzed as to their cost and impact on overall project costs?
#8148	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	Could we say some of this question is addressed in the forthcoming MF feasibility study? It does look at impact on cost. Additionally, we often request proformas from developers to understand the impact of providing ADUs but have not been successful to date at getting that information.
#8170	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/1/2022	This question is not related to implementing 2019 GP policies.
#8256	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/8/2022	<p>Staff conducted research on ADU Programs throughout the country. A 2017 Grounded Solutions Network paper did an exhaustive review of existing inclusionary zoning (IZ) programs across the country. Their research found over 1,379 programs in 24 states and Washington, D.C. This research covered program elements like: affordability requirement, minimum unit threshold, affordability period, incentives and options for compliance. The lowest requirement for affordable units is typically 10 percent. The average range is 10-20 percent. Loudoun County is well within the range of the typical ADU requirement, if not on the lower end.</p> <p>In addition, the feasibility study analyzing the removal of the exemption of the multifamily buildings evaluates the impacts on MF buildings with 4+ stories and an elevator. This study will presented at an upcoming TLUC meeting.</p>
#8072	9.01 Affordable Dwelling Unit Program
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/30/2022	Sample calculation E. shows $90 \times 20\% = 108$. Clearly wrong. $90 + 90 \times 20\% = 108$ would be correct. or $90 \times 120\% = 108$...Check and or clarify all of the sample calculations.

ID	Section
#8151	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	Unclear on this question - as I read the sample calculation $90 + (90 \times 20\%) = 108$ dwelling units is correct
#8071	9.01 Affordable Dwelling Unit Program
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/30/2022	8.01.E.2.c. Refers to 8.01.I.6.c. which does not exist? What is the proper reference?
#8150	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	Good catch; should be 8.01.J.6.c
#8070	9.01 Affordable Dwelling Unit Program
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/30/2022	Can the appropriate/applicable definitions be made available with this section, so that those unfamiliar are better able to comment?
#8152	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	Staff have some definitions drafted for inclusion in Chapter 11. If terms in question can be specified, we can provide definitions where we have them.
#8240	9.01 Affordable Dwelling Unit Program
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/8/2022	As part of ZOC Subcommittee packet, we will provide all applicable definitions.
#8069	9.01 Affordable Dwelling Unit Program
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/29/2022	8.01.L.1. Once again, "ADU Program" needs a precise definition. Here's the problem: Your words and terms are ones that you use in regular discourse. However, for the ZO to work, all these familiar terms need full, precise legal definitions.

ID	Section
#8165	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	ADU Program is more fully defined in Chapter 1450. In addition, the first purpose statement uses the language of the state code - Affordable Dwelling Unit Program - and the regulations of 8.01 specifically detail how the ADU Program works, and, therefore, what it is.
#8068	9.01 Affordable Dwelling Unit Program
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/29/2022	8.01.K. 5. c. "applicable affordable housing program" needs a good definition.
#8155	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	Currently, only 2 programs are applicable to AHUs as defined in the ordinance : HUD 221d4 and LIHTC. Staff will be proposing to add some additional programs to the definition in the ordinance in Chapter 11.
#8067	9.01 Affordable Dwelling Unit Program
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/29/2022	8.01.K.4 "Rules and Regulations" and "funding Programs" need to be better defined.
#8154	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	In the current zoning ordinance, AHUs are defined as A dwelling unit for rent or for sale developed pursuant to A. a Virginia Housing (VH) Low Income Housing Tax Credit (LIHTC) program; B. or a U.S. Department of Housing and Urban Development (HUD) 221(d)(4) program that meets the Definition of Affordable Housing included in the HUD Multifamily Accelerated Processing (MAP) Guide, Revised January 29, 2016, as amended, from the Office of the Assistant Secretary for Housing – FHA Commissioner (“HUD 221(d)(4) Affordable”); These units are governed by these programs and the rules of the administering agencies.
#8066	9.01 Affordable Dwelling Unit Program
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/29/2022	8.01.J. Is ADUAB defined somewhere?
#8153	9.01 Affordable Dwelling Unit Program

ID	Section
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	ADUAB is the Affordable Dwelling Unit Advisory Board and is governed by Chapter 1450 of the Loudoun County Codified Ordinances (1450.10(c)).
#8065	9.01 Affordable Dwelling Unit Program
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/29/2022	8.01.F.1 and 2. "Type" is defined for MF as being based on bedroom count. Is "Type" for SFD defined?
#8169	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	The term is "dwelling unit type" and include single family detached, single family attached, MF Stacked and MF Attached. This is further clarified for MF Stacked and MF attached because it is important to ensure a range of affordable unit sizes (by bedrooms) is made available in MF projects.
#8064	9.01 Affordable Dwelling Unit Program
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/29/2022	F.11. Is "market rate dwelling unit" defined?
#8167	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	I don't believe the ordinance currently defines "market-rate unit" nor does Chapter 1450. Staff will consider adding this definition.
#8063	9.01 Affordable Dwelling Unit Program
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/29/2022	8.01.C.1. How is "affordable" defined? (This may be answered later, in sections I've not yet read.)
#8166	9.01 Affordable Dwelling Unit Program
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/1/2022	Affordable is defined by the income of the households being served so 30-70% AMI. Chapter 1450 provides guidance on how to determine pricing, and ADUAB follows Chapter 1450 to set prices.
#8108	Chapter 9: Attainable Housing

ID	Section
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 1/31/2022	Looking at the potential number of units that would come from ADUs, AHUs and UHNUs, the county clearly won't have enough attainable housing simply by relying on incremental increases in bonus density incentives for new development, nor will it continue to be attainable in perpetuity without a paradigm shift in the way the county works to achieve this goal. A look back over the last 20 years worth of growth demonstrates how this approach has failed.
#8119	Chapter 9: Attainable Housing
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/31/2022	Gem is absolutely correct. Analysis of the County housing units by assessment value shows the total quantity of units less than \$350K (the level considered to be "affordable" in Loudoun) is approximately 15%. The data indicate that the current program approach has generally produced a low volume of "affordable" houses. See page 14 for a diagram: https://loudouncoalition.org/wp-content/uploads/2020/04/UHN-Committee-BRIEFING-July-2020-HANDOUT.pdf
#8187	Chapter 9: Attainable Housing
By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date: 2/5/2022	By increasing the requirement for ADUs up to 10% for multifamily and 15% for single family, when using recently adopted legislative applications as an example, the increase is significant in terms of ADUs created. AHUs are provided in place of ADUs because a developer usually provides more AHUs than required. The zoning ordinance is one tool described in the Unmet Housing Needs Strategic Plan. The UHNSP lays out numerous strategies to increase housing affordability in the County. It will take multiple tools being implemented to make progress on meeting housing needs in the County. Only in recent years has the County started adding to its toolbox. Housing will be reporting to TLUC quarterly on progress to meet UHNSP goals.
#8103	Chapter 9: Attainable Housing
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/31/2022	"The January 28, 2022 WASHINGTON BUSINESS JOURNAL article, ""Why Loudoun County's Development Strategy is Not Working Out as Planned,"" directly relates to this week's ZOC subject of Attainable Housing. It also quotes a number of people including: Supervisor Matt Letourneau, Supervisor Mike Turner, Chair Phyllis Randall, ZOC members Colleen Gillis and Gem Bingol, DED Director Buddy Rizer, Chamber CEO Tony Howard, industry experts Mike Romeo, Kim Hart and Stewart Schwartz, and Planning Commissioner Chair Forest Hayes. Reference: Washington Business Journal: www.bizjournals.com/washington/news/2022/01/28/loudoun-county-development-plan.html For anyone unable to access the article online a copy is attached to my pdf submission, and is well worth reading before our ZOC discussion."
#8102	Chapter 9: Attainable Housing
By: Maura Walsh-Copeland Tags: zoc	8.01 ATTAINABLE HOUSING--PARKING

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:1/31/2022</p>	<p>5.05.03 C. PARKING REQUIREMENTS FOR ADUS, USE & POLICY AREA. When discussing Parking Ratios previously for Chapter 5 (Dev. Stds, Parking), the discussion of Parking Ratios for ADUs/AHUs was put off until the drafting of Section 8.01. This important component is missing from this draft for review and discussion. When will proposed text for Parking Ratios for ADU/AHU buildings be presented?</p>
#8186	Chapter 9: Attainable Housing
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:2/4/2022</p>	Staff are receptive to suggestions regarding appropriate parking ratios.
#8188	Chapter 9: Attainable Housing
<p>By: Rebekah King Tags: staff rebekah.king@loudoun.gov Date:2/5/2022</p>	5.05.09 does address parking reductions for including affordable units. They are not specified as ADUs/AHUs but ADUs/AHUs would qualify; the reductions are based on income limits.
#8074	Chapter 9: Attainable Housing
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/31/2022</p>	Comment received from a knowledgeable resident: "'c. Simplifying the Zoning Ordinance to make it more user friendly.' This section of the rewrite could not be further from that goal."
#6477	8.10 Sign Measurements
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021</p>	6.10 SIGN MEASUREMENTS. Currently the County allows additional material attached to the sign making it appear, sometimes, twice as big as that allowed. Because the County does not count it as part of the sign, we are seeing extra-large signs appear around the County. How will the regulations stop signs from adding additional material and "pretending" that it is not part of the sign?
#6805	8.10 Sign Measurements
<p>By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021</p>	This draft eliminates the "background structure" and measures the entire sign face and background as a whole.
#6492	8.09 Sign Permits and Administration
<p>By: Gem Bingol Tags: zoc</p>	I agree with John on when the zoning administrator should be able to use discretion in granting a minor modification.

ID	Section
gbingol@pecva.org Date:12/13/2021	
#6734	8.09 Sign Permits and Administration
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	Noted-thanks!
#6476	8.09 Sign Permits and Administration
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	"6.09 SIGN PERMITS AND ADMINISTRATION. C. Sign Development Plan (SIDP) What is an example for 4.c. ""The plan must demonstrate compatibility with, and be subordinate to, the structures and land uses referenced by the sign""?"
#6735	8.09 Sign Permits and Administration
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	As part of a sign plan application, the applicant must demonstrate that the size, location, and type of sign are compatible with and subordinate to the development they will advertise. Signs should use materials, size, and location that are harmonious or consistent with the development. For example, a plastic-cabinet pole sign with a face that extends 10' above the front brick building facade is not compatible or subordinate to the facade. However, a monument sign that is only 10' tall and 50' in area with a brick background structure and a small digital portion of the face in front of a 35' tall brick structure is subordinate to that structure, and likely compatible with it.
#6440	8.09 Sign Permits and Administration
By: John Merrithew Tags: zoc Date:12/9/2021	Legislative review of sign plan or minor revisions is a terrible waste of time and money in my opinion, particularly when it comes to number and size of signs. The Zoning Administrator should be given more discretion to grant revisions and allow an applicant to appeal to the BZA or PC.
#6736	8.09 Sign Permits and Administration
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	Noted - thanks!
#6475	8.08 Illuminated and Digital Signs
By: Maura Walsh-Copeland Tags: zoc	"6.08 ILLUMINATED AND DIGITAL SIGNS. Digital signs should not be allowed to change messages continuously; this is a dangerous type of sign because of their distractive nature. Many jurisdictions do prohibit them. Constituent

ID	Section
Maura@Walsh-CopelandConsulting.com Date:12/12/2021	Comment: ""I recently saw a truck at the intersection of King and Market Streets with the whole side of the truck (mid-sized) a digital screen. Try not looking at it!""
#6803	8.08 Illuminated and Digital Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	This draft establishes a hold time consistent with VDOT standards. It's certainly common to have longer hold times - such as 8 seconds (instead of 4).
#6437	8.08 Illuminated and Digital Signs
By: John Merrithew Tags: zoc Date:12/9/2021	I forget the correct term but should we or do we have a limit on the rate at which a display sign changes messages?
#6804	8.08 Illuminated and Digital Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Yes - hold time (see C.2).
#6513	8.07 Historic Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	6.07 B and C. I see now that you are considering a sign to be an Historic Landmark. Any example of one? Weird.
#6801	8.07 Historic Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Some communities protect signs in historic areas or on landmarks (such as painted "ghost" signs for businesses or institutions that were part of the building or area's history).
#6512	8.07 Historic Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	6.07 A. Is not written well. It should read more like this: "...have a sign to designate a Historic Landmark..."
#6802	8.07 Historic Signs

ID	Section
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	This language reads that the sign designates the landmark? I don't follow. The draft allows a property owner to apply to designate a sign as a landmark.
#6511	8.06 Incidental Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Temp. Signs - 8 feet high? Too much.
#6792	8.06 Incidental Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Noted for discussion. This is consistent with the current standard (Table 5-1204(D)(5)).
#6510	8.06 Incidental Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	An 8 sf banner on every lamppost? Sounds crazy.
#6793	8.06 Incidental Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Noted for discussion. This is consistent with the current standard (Table 5-1204(D)(7)(h)).
#6509	8.06 Incidental Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	6.06 A 2. It's "De Minimis."
#6893	8.06 Incidental Signs
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/3/2022	corrected. thank you.
#6491	8.06 Incidental Signs

ID	Section
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:12/13/2021	Table 6.06-1 Banners. Is it possible for a vinyl, fence-mounted banner to be considered as a substitute for a pole-mounted, freestanding sign?
#6794	8.06 Incidental Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	It's possible, but that would not allow much sign area (unless you mean that they could have a ground sign, but not a pole sign). Is that the intent here?
#6474	8.06 Incidental Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	<p>"6.06-4 INCIDENTAL SIGNS. Residential (a.k.a. ""neighborhood"") areas are not allowed to use Incidental signs, while Rural areas, with many residences, are allowed up to 6. Although 6 are allowed at 2 sf each, the cumulative area is 32 sf which could be construed to mean 16 signs. Is this an error? Line #6 has no title.</p> <p>Constituent Comment: ""Yards with many signs could detract from their neighbor's property values. Who would buy a home next to a neighbor using multiple signs?""</p> <p>How do Incidental signs differ from De Minimus signs? Can a homeowner or business use both? This would allow 6 Incidental signs plus 2 De Minimus signs plus unlimited temporary signs (for 120 days each). "</p>
#6795	8.06 Incidental Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	There was an internal conflict for neighborhood signs, which said "N" but then had maximum area and height. This is corrected to "Y." For the RPA, only 2 incidental signs (at 2 sf, or 4 SF total) may be attached, and the cumulative area applies to freestanding signs. So, if there are 2 x 2 attached incidental signs, up to 4 incidental freestanding signs are allowed (which could be 8 SF apiece). The temporary sign regulation is in the current regulations and the concerns are noted. We have to allow a reasonable number of incidental/temporary signs for free speech purposes - for example, during elections, while a house is for sale, to express an opinion, etc. This sets a limit on those.
#6473	8.06 Incidental Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	<p>"6.06-3 INCIDENTAL SIGNS. Temporary Signs. How does this category make sense? The section allows for 32 sf signs anywhere in the County including town houses and other residential districts; these would be larger than some of those allowed in Commercial/Industrial areas. There is no limit to the number of signs and no cumulative area. Although the description at the top describes a limit of 120 days a year, what would prevent a second sign to be put up for 120 days, and the third, etc., meaning that multiple signs could be up all year? Temporary signs should not be allowed; signs should follow the other sections only. This is a remnant of the Board's problems with those who wanted to express their opinions in signs in an unlimited manner. The Consultant's Report</p>

ID	Section
	(p. 14) states, ""Courts have upheld reasonable restrictions on size, height, setback, spacing, and the color of signs as well as bans on temporary, overhanging, free-standing, rooftop, windblown, moving, flashing, and illuminated signs."" Additional review, clarification and regulations should be applied to ""temporary"" signs. Will this be done before the 90-day ZOR public review?"
#6796	8.06 Incidental Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	The concerns are noted, and this is consistent with the current regulations (Table 5-1204(D)(5)). As to placing multiple temporary signs during successive 120-day periods, this seems to be allowed by the current regulations and the regulations could resolve this with a limit on their number. The incidental sign section below debits the temporary signs toward the maximum number of incidental signs, so putting too many temporary signs on a property would limit the ability to place other incidental signs.
#6472	8.06 Incidental Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	"6.06-2 INCIDENTAL SIGNS. De Minimis Signs. -- The cumulative area for sf is 2 sf, with individual sign area max is 1sf, but the number allowed is blank. Shouldn't the number allowed be 2 to help folks understand the limit? -- Although the cumulative area is listed under Dimensions is 2 sf (line 4) under Design (line 7), digital signs are allowed ""max percent of sign area or 30sf, whichever is greater"" Surely this is either in error and digital signs are /should not be allowed as De Minimis Signs, or this inconsistency needs to be clarified?"
#6797	8.06 Incidental Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	The number is left blank because the sign area is the controlling factor. So, 4 0.5 sf de minimus signs are allowed, for example. The max percent for digital is an inconsistency and is eliminated - thanks for catching that!
#6471	8.06 Incidental Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	"6.06-INCIDENTAL SIGNS. Banners. The Consultant reports indicates that, ""Loudoun County does not generally allow balloons, banners, pennants, or inflated devices (Section 5-1202(A)(5)). An exception is ornamental/seasonal banners are allowed on lamp posts in PD-CC, PD-SA, PD-TC, PD-TREC, PD-TRC, and PD-MUB (Sign Matrix, Table 5-1204(D)(7)(h))."" Why then, are banners now being allowed without similar type and location restrictions?"
#6798	8.06 Incidental Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Table 6.06-1, line 3 limits banners to lamp posts with the same restrictions provided in Table 5-1204(D)(7)(h).

ID	Section
#6470	8.06 Incidental Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	6.06 INCIDENTAL SIGNS. Can and will matrices for Banner Incidental Signs, Generally (E.) differentiate the lump category of "Rural" and "Rural Res" and Rural Econ/comm/biz"?
#6799	8.06 Incidental Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	All of the tables can differentiate residential and non-residential uses in the RPA, as discussed in the other sections.
#6436	8.06 Incidental Signs
By: John Merrithew Tags: zoc Date:12/9/2021	Do banners include the festival, seasonal banners attached to light poles? If not how are such banners permitted?., Temporary signs line 6 typo - should be 8 ft. Incidental signs Line 6 add the word height. Lines 3, 4, and 5 - if we are allowing one incidental sign per entrance and limiting the individual signs to 2 square feet than we would need 16 entrances to meet the maximum cumulative sign area. - just doesn't seem right. Maybe we could drop the cumulative total?
#6800	8.06 Incidental Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Banners are addressed in Table 5-1204(D). Typos for temporary (line 6) and incidental signs (line 6) are fixed. The maximum cumulative area is for freestanding signs, and the individual area applies only to attached signs. So, if you have two building entries you can have one 32 sf freestanding sign, or two 16 SF signs.
#13952	8.05 Attached Signs
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Table 6.05-3 Murals In keeping with the rural environs, murals should not be lit at night.
#6521	8.05 Attached Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Allowing 4 window signs per facade in the Urban area, PLUS wall-mounted signs of up to 200 sf per facade is a nasty recipe!
#6778	8.05 Attached Signs

ID	Section
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Do you have examples of buildings meeting these existing standards (some uses get up to 6 wall signs) that are unacceptable?
#6520	8.05 Attached Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Item 6 Wall signs must not extend beyond the edges of the façade, including the building's parapet. Question: If there's an enclosed mechanical room on the roof, can a wall sign be placed upon it? suggest not, but that should be stated.
#6779	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Clarified here that the facade does not include any rooftop structure (this is a term defined by the International Building Code, which is incorporated by reference as part of the state building code). Also added a definition of "facade" to Chapter 11 ("The exterior wall of a building exposed to public view or a wall viewed by persons not within the building").
#6519	8.05 Attached Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	I would not allow digital wall signs anywhere.
#6780	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Noted for discussion.
#6518	8.05 Attached Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Wall signs in Urban area: The number of facades per building is good. Thanks.
#6781	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Thanks!

ID	Section
#6508	8.05 Attached Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Why allow ANY window signs? And if you do, why on earth would a property in the RPA need three? Under Design, show LED and show LED as not being allowed in the RPA.
#6782	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Window sign are common forms of expression, even in residential areas. Banning them would be unusual. They are very restrict (1.5 sf) in rural areas. LED is already prohibited in the rural districts because it's a form of digital sign.
#6507	8.05 Attached Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Wall signs in RPA. The word "Building" is problematic. Logically it would include barns. Here's an example using our farm: 4 barns + 1 house = 5 buildings, so we could have 15 signs! That's nuts. Just change Building to Lot. The sizes areas seem fine.
#6783	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Change made. According to staff, the County recently processed a Board Member Initiative (BMI) to allow greater flexibility in signage for rural businesses to address concerns that rural businesses are located on such large properties that limited sign allowances are inadequate. However, the definition of "farm sign" currently only includes freestanding signs, so restricting wall signs by lot still provides flexibility for sign displays.
#6490	8.05 Attached Signs
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:12/13/2021	Table 6.05-1 Wall Signs When rural signs enforcement was triggered in a complaint, I think that a barn mural was also cited. The suggestion of a artwork/mural category seems like it would be helpful to be a separate category as suggested.
#6784	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Noted - thanks!
#6469	8.05 Attached Signs

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	"6.05 ATTACHED SIGNS, Wall Signs. Greatly appreciate having no animated signs which really distract drivers attention from the road. Larger signs are allowed in rural areas than in other residential areas. Residential areas in the rural areas are not protected. Will this inconsistency be reviewed and rectified by before the 90-day referral?
#6785	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Noted for discussion.
#6468	8.05 Attached Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	6.05 ATTACHED SIGNS. Can and will matrices for Wall and Window signs differentiate the lump category of "Rural" and "Rural Res" and Rural Econ/comm/biz"?
#6786	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Yes - we can create separate categories for residential and non-residential in rural. This already has separate allowances based on lot size.
#6435	8.05 Attached Signs
By: John Merrithew Tags: zoc Date:12/9/2021	Window sign - number allowed - am I correct the standard is 4 per facade or 4 per tenant space? Is there a need to restrict the number if the area limit is 25% of the window area? Is 25% based on local applications? I suggest removing the 10 sf maximum. It seems arbitrary and small. Just go with a % of window area.
#6787	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Window signs are 4 per tenant space per the current standards, but if there are no "tenants" it's 4 per facade. The suggestion to eliminate the number and 10 SF max is noted for discussion. These limits are consistent with the current standards in Table 5-1204(D).
#6434	8.05 Attached Signs
By: John Merrithew Tags: zoc Date:12/9/2021	Cumulative and Individual sign area ()lines 4 and 5 - is there a need for a limit ion individual sign area if we have a cumulative maximum? Some of our larger individual user buildings could use a single logo that is 20% of the wall area. I do think 20% is a high number. Are these based on actual sign plan applications?

ID	Section
#6788	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	The cumulative and individual sign area categories are based on the current standards (Table 5-1204(D)).
#6433	8.05 Attached Signs
By: John Merrithew Tags: zoc Date:12/9/2021	Wall signs in rural area - are these commercial signs or home address signs? I don't see the relationship between lot acreage and number or size of signs. Wouldn't the number of signs be based on number of entrances or buildings; and shouldn't the size be based on setbacks from the road or some function or visibility-related measure?
#6789	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	Wall signs are not tied to message (such as a "commercial" message or an address), as constitutionally required. Tying the signs to lot acreage allows the signs to scale to lot size (allowing for wider spacing between signs, for example). Some codes to allow larger signs if they are set back further from the road. Does the ZOC or staff support that approach in the RPA? To what maximum sign area?
#6430	8.05 Attached Signs
By: John Merrithew Tags: zoc Date:12/9/2021	The County has permitted digital signs in several commercial areas. If the goal is to not create nonconforming signs, should we permit digital signs in commercial, employment and mixed use areas?
#6790	8.05 Attached Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/27/2021	This draft does allow digital signs in commercial, employment and mixed use areas (see Table 6.05-1, line 7).
#13979	8.04 Freestanding Signs
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Table 6.04-1 and 2 are missing the cumulative total of signage allowed on lots less than 5 acres. This total should be the same as that of lots over 5 acres.
#13966	8.04 Freestanding Signs

ID	Section
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Table 6.04-1 and 2 . Individual sign sizes, whether freestanding or pole, in the rural area should be limited to the size for parcels under 5 acres at a max of 20 ft. Signs for the traveling public are at entrances which generally are relatively the same despite differences in parcel size. Smaller is better whether for ground or pole signs if they are appropriately located at an entrance. If a property owner needs to provide signage internal to the property to direct people to different activities that are not visible offsite, that can be up to the property owner as long as they stay within the max cumulative area.
#13949	8.04 Freestanding Signs
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	In table 6.04-1 and 2, externally lit signs should be prohibited.
#11064	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	6.04-1-2. Ground and Pole Signs: Currently, Home Occupations have a 2 sq ft limit on size for signs. Changes to allow up to 60 sq ft on lots over 5 acres are am immense change and will clutter our residential areas.
#11063	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	6.04-1 and 6.04.2 Ground Signs and Pole Signs: The 45 sq ft sign area proposed for rural areas is the same size as signs in commercial areas. Do not clutter our rural areas with huge signs.
#11062	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	6.04 1-6.06-2 The total number of signs allowed under this proposal will make a serious detrimental degradation of our rural areas. We believe the rural business will succeed only if the rural atmosphere is maintained. The sign sizes and numbers should be reduced.
#11061	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	6.04 1 & 2 Many lots in the rural area are made up of developments with 3 acres or more. House are close together, especially in cluster developments. Homeowners agreements could protect them where present; we don't believe residents in these areas would want 40 sq ft of signs plus wall and mural signs in their neighbor's yards.

ID	Section
#11060	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	6.04 1 & 2 There is no cumulative total for lots of less than five acres leading us to believe they could have a total of 20 sq ft of ground and and 20 sq ft of pole signs plus 10 sq ft each for wall and mural signs. Lots over 5 acres are limited to 60 sq ft for pole and ground signs in the proposal, so little difference: 40 sq ft or 60 sq ft. We believe these signs would degrade our countryside and especially villages where homes are close together.
#11059	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	6.04-1 and 6.04-2 The height limits on Ground and Pole signs would produce signs of this size: Ground signs limited to 4' high would be 11.2 ft long and 4' high; Pole signs limited to 5' high would be 9 ft long and 4 ft high. These dimensions seem more like banners. Are these the intended dimensions?
#11057	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	6.04-1 and 6.04 2 Lighting these large signs in the rural areas will change the whole atmosphere. Please do not allow lighting of signs.
#11056	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	6.04-1 and 6.04.2 Ground Signs and Pole Signs: The wineries we have passed by which have signs meeting the current ordinance are full of people. Who comes out to the country to see what signs are up? Now, and more so in the future, folks use the Internet. Google Maps and other Loudoun internet sites show the wineries giving links to web-sites and information of directions, travel time, and hours of operation. Driving out, a voice warns you when you are approaching and tells you when to turn. This is the future, not signs which clutter our beautiful rural areas.
#11055	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	6.04-1 Ground Signs: Signs of 45 sq ft are way too large for rural residential areas....we just live here. Combined with other signs, we could have 60 sq ft of ground and pole signs plus numerous small signs and a 60 sq ft mural. This will be a blight on our rural areas. Homes and farms are the reason we have a rural area. Large signs are not needed. Signs are easy to see in the un-blighted rural areas.
#6703	8.04 Freestanding Signs

ID	Section
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:12/19/2021	I agree with Maura that in essence, the allowed sign sizes in the Rural area are too large. They are not consistent with the rural environs and detract.
#6763	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/26/2021	According to staff, the County recently processed a Board Member Initiative (BMI) to allow greater flexibility in signage for rural businesses to address concerns that rural businesses are located on such large properties that limited sign allowances are inadequate. Suggestion: provide a smaller allowance for residential property or property that is < 5 acres, and a larger allowance for non-residential property with > 5 acres (including farms)?
#6702	8.04 Freestanding Signs
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:12/19/2021	The Zoning District Categories in the Tables should exactly parallel those identified in 6.01.E Categories. They do not. Is it correct to presume that "Residential" shown on the Table is the same as "Neighborhood" in 6.01.E? If so, please adjust.
#6764	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/26/2021	Good catch - "Residential" is changed to "Neighborhood" throughout.
#6516	8.04 Freestanding Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Why is halo lighting not permitted for ground signs in Urban areas? (Perhaps I don't know what halo lighting is, which reinforces my previous comment that definitions and examples are sorely needed.)
#6765	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/26/2021	"Halo lit" is defined in Chapter 11 ("Halo Lit: Illumination created by concealing the light source behind three-dimensional opaque letters, numbers, or other characters of a sign, resulting in the nighttime perception of a halo around the silhouette of each character. This is also referred to as "reverse channel" or "reverse lit" illumination. A halo lit sign is not considered an internally illuminated sign.") We will add graphics in later drafts. Meanwhile, here's an article that has some examples of halo lit signs: https://www.davessigns.com/5-benefits-of-halo-lit-channel-letters/ These are common for wall signs, but are added here ground signs at your suggestion.
#6515	8.04 Freestanding Signs

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Ground signs in Urban areas should be held to 86 or 8 feet high, not 15 feet.
#6766	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/26/2021	Change made
#6506	8.04 Freestanding Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Pole Signs in RPA. The permitted sizes are way too big. A 45 sf sign could be 5' x 9'. That's enormous.
#6767	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/26/2021	According to staff, the County recently processed a Board Member Initiative (BMI) to allow greater flexibility in signage for rural businesses to address concerns that rural businesses are located on such large properties that limited sign allowances are inadequate. Signs on lots < 5 acres are reduced to 20 sf, but are kept at 45 sf on larger lots pending further discussion.
#6505	8.04 Freestanding Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Suggest only external illumination for ground-mounted signs in RPA. Then define this as a ground-mounted floodlight with no light spread beyond the sign it illuminates.
#6769	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/26/2021	Change made, and limits on external illumination are added to 6.08 (not to the definitions).
#6504	8.04 Freestanding Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Individual signs in RPA: 30/45 sf are much to big. Suggest 20 sf on small lots, 30 sf on larger.
#6768	8.04 Freestanding Signs

ID	Section
By: Mark White Tags: staff mwhite@planningandlaw.com Date: 12/26/2021	According to staff, the County recently processed a Board Member Initiative (BMI) to allow greater flexibility in signage for rural businesses to address concerns that rural businesses are located on such large properties that limited sign allowances are inadequate. Signs on lots < 5 acres are reduced to 20 sf, but are kept at 45 sf on larger lots pending further discussion.
#6503	8.04 Freestanding Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 12/13/2021	These are Ground signs, and their height limit should be 4 feet or less; 5 feet is too massive.
#6770	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date: 12/26/2021	Change made (Rural ground signs from 5' to 4').
#6489	8.04 Freestanding Signs
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 12/13/2021	6.04-2 Pole signs Same question as in the residential category--how would free-standing interpretive signs that provide environmental or historic information for the public be handled? These might occur after the original plan that maxxed out the number of permitted signs.
#6771	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date: 12/26/2021	I suggest adding a subdivision entry sign category (based on location and not message). To accommodate other types of signs, we could include a freestanding sign allocation for subdivisions or larger properties (maybe > 5 acres as in the rural category). That could accommodate a range of functions on a larger sign that is general out of scale with a residential lot.
#6488	8.04 Freestanding Signs
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 12/13/2021	Table 6.04-2 Are interpretive signs considered pole signs? If a neighborhood wants to provide permanent environmental or historic information on an interpretive sign, does this mean that only two such signs would be possible in a community that may not be a PD neighborhood with a master plan?
#6772	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date: 12/26/2021	"Interpretive signs" are not defined in the current regulations, but I assume from the comment (#6488) that this means signs that provide environmental or historic information. Those messages could occur on any kind of sign - ground, pole, sidewalk, or any attached or incidental signs. This draft does not define signs by their message, as generally required by law.

ID	Section
#6467	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 12/12/2021	"6.04- FREESTANDING SIGNS. Commercial, Employment/Industrial and Urban/Mixed Use By lumping all in one category, this draft allows for the large signs now allowed in our biggest heavy use district to be used in all of them. Constituent comment: ""We hope these will be restricted to viewing within the complex and not viewable from any road. Digital signs are very distracting for drivers, especially those with changing messages. We note the fact that our eyes are torn from the road unwillingly to the ever-changing digital signs at schools. Such signs are frequently followed by stoplights, or, school children walking where they should not be.""
#6773	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date: 12/26/2021	Noted. Digital signs are currently allowed by SIDP, and this draft provides standards for them in 6.08 with standards such as hold time provisions to minimize distractions.
#6466	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 12/12/2021	"6.04-1 FREESTANDING SIGNS. Pole Signs, Rural The section permits 45 sf (almost 7 sq feet) for all uses (with over 5 acres); the same as allowed in Commercial areas of the County. This drives up the rural clutter and interferes with the rural nature for the many, and rising, number of homeowners. Our rural areas would be greatly changed by these large signs. Lighting of these signs would be allowed just as it will be in heavy use areas such as Commercial."
#6774	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date: 12/26/2021	According to staff, the County recently processed a Board Member Initiative (BMI) to allow greater flexibility in signage for rural businesses to address concerns that rural businesses are located on such large properties that limited sign allowances are inadequate. The draft provides a smaller allowance for smaller lots and is revised to eliminate backlighting per other comments.
#6465	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 12/12/2021	"6.04-1 FREESTANDING SIGNS. Ground Signs, Commercial Commercial signs total more square footage than currently allowed especially for some commercial entities. Constituent Comment: ""It seems that because we now need everyone in one ""pot"" so to speak, we are changing the ordinance to allow for the biggest sign allowed now to be allowed for everyone. The entire character of the County would change from one where without knowing why, we feel more comfortable in Loudoun than in nearby Fairfax where signs assault the eye in Commercial areas. We breath a sign of relief when we get to Loudoun. Don't change that.""
#6775	8.04 Freestanding Signs

ID	Section
By: Mark White Tags: staff mwhite@planningandlaw.com Date: 12/27/2021	Noted. This draft avoids user preferences for sign allowances, and we are in the process of benchmarking allowances in similar communities. The current ranges in commercial districts range widely between uses, so maybe we can divide the range at a finer level of detail based on lot or building size?
#6464	8.04 Freestanding Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 12/12/2021	<p>"6.04-1 FREESTANDING SIGNS. Ground Signs, Rural Rural sign allowances are a huge increase over what is allowed now. For example, home occupations are allowed 2 sf and B&Bs, 4 sf in the current ordinance and would be allowed up to 45 sf in this proposal. Signs of 4 sf are easily seen on rural roads; there is no other human clutter to interfere with the view. One might think that signs of almost 7 ft by 7 ft would be appropriate for farms of 100 acres or more. However, these proposals would allow these large signs anywhere in the Rural areas. Categorizing all of ARN, ARS and A-10 as ""rural"" in the Rural areas is a misnomer. Although many areas are still generally rural, there are more and more smaller lots (many grandfathered A-3 and newer cluster lots) and many more coming. These are ""suburban-like"" type developments within the Rural districts. Would 45 sf signs be appropriate in these development areas? Would housing developments in the other Neighborhood/Residential/Suburban areas (UPA/SPA/TPA) want signs this big in neighbors yards? (No, they would not.) Many of these suburban incursions in the rural areas look like developments in Suburban districts, houses all along the roads and acreage out back. In addition, lighting of these signs would be allowed just as it will be in heavy use areas such as Commercial. If a residence on 25 acres, with neighbors on 3-5 acre lots closer to the road put up a 45 sf sign, would it impinge on the ""rural"" nature? Yes. In a similar manner, would such a sign for a rural business on 25 acres with neighbors on 3-5 acre lots also impinge on the rural character as described in the Purpose section? Also, yes. Are large signs needed or should they be allowed with the increased use of GPS and internet ""tour maps"" to locate Loudoun's great farm markets, wineries, breweries and such rather than the possibility of large signs? This points to the need for additional sign regulation review and categorization for ""rural."" Large signs in rural ""residential"" areas would add to the woes of many narrow dirt roads. Constituent comment: ""Let's not throw out the baby with the bath water and clutter our rural areas so much that they become unattractive. That will hurt businesses as well as homeowners.""</p>
#6776	8.04 Freestanding Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date: 12/27/2021	According to staff, the County recently processed a Board Member Initiative (BMI) to allow greater flexibility in signage for rural businesses to address concerns that rural businesses are located on such large properties that limited sign allowances are inadequate. Signs on lots < 5 acres are reduced to 20 sf, but are kept at 45 sf on larger lots pending further discussion.
#6463	8.04 Freestanding Signs

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	6.04 FREESTANDING SIGNS. Can and will matrices for Ground Signs, Pole Signs and Sidewalk Signs differentiate the lump category of "Rural" and "Rural Res" and Rural Econ/comm/biz"?
#6844	8.04 Freestanding Signs
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/3/2022	Staff and the consultant are contemplating further division of "Rural."
#6701	8.03 Prohibited Signs
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:12/19/2021	If the definition of a sign is: "Any visual display that comprises letters, words, numerals, figures, logos, trademarks, symbols, emblems, devices, or illustrations, or any combination thereof, which identifies a property, business, product, service, person, or entertainment, but not including, when standing alone, a flag, emblem, badge, or insignia of any governmental unit.", which is found in the '93 ordinance, then a Mural is not necessarily a sign and could be allowed without a sign permit--just as any other work of public art. Do we have a mechanism for controlling what is displayed as public art? Where would that be in the ordinance? What is the impact upon public health, safety or welfare?
#6755	8.03 Prohibited Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	Murals include illustrations, and often include text, so they would qualify as a wall sign as currently defined. Per the ZOC discussion, I'll work on regulations that involve design review for these.
#6502	8.03 Prohibited Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Attention-getting devices. Prohibit feather signs. They are intrusive and tacky.
#6837	8.03 Prohibited Signs
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/3/2022	Feather signs added to 6.03.F
#6501	8.03 Prohibited Signs

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	6.03 The prohibition against signs on trees and fences may not be fair. For example, land trusts usually place signs on the fences of properties on which they hold conservation easements.
#6756	8.03 Prohibited Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	We could count signs placed on fences toward a project's incidental sign allocation.
#6500	8.03 Prohibited Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Include LEDs along with neon.
#6757	8.03 Prohibited Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	LEDs are digital signs. These are regulated by the draft, rather than outright prohibited or left to the SIDP process. If the committee prefers a different approach, let's discuss.
#6462	8.03 Prohibited Signs
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	6.03 PROHIBITED SIGNS, F. Attention-Getting Devices. How is a "feather flag" classified? Should Feather flags be included in the list of prohibited signs as they have been increasing used all over the County and are a distraction to drivers and cause clutter?
#6758	8.03 Prohibited Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	Feather signs are added to the list of prohibited signs (see Charlie's comment).
#6428	8.03 Prohibited Signs
By: John Merrithew Tags: zoc Date:12/9/2021	Will or does the ordinance distinguish between signs and artistic murals? Would like to see murals permitted as public art.
#6759	8.03 Prohibited Signs

ID	Section
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	"Art" is considered a form of speech, and murals are legally considered signs/speech. I am drafting language for those based on the 12/15/21 discussion with ZOC and comments.
#6427	8.03 Prohibited Signs
By: John Merrithew Tags: zoc Date:12/9/2021	I think we should rethink the neon light prohibition in transit and mixed use centers. Such lighting van add to the dynamic of the community.
#13809	8.03 Prohibited Signs
#6499	8.02 General Sign Requirements
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	6.02 - General. I would like to regulate entry features to projects, which makes sense in that they are signifiers just like signs. There should be size limits, lighting specs, etc.
#6752	8.02 General Sign Requirements
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	Most project entry features would qualify as ground signs (example: these images popped up in a Google search of "project entry features", and would all qualify as ground signs - https://www.secplanning.com/project/entry-feature-design/). It does make sense to regulate subdivision entry signs separately, as they are typically ground signs are are not permitted or customary on a residential lot.
#6487	8.02 General Sign Requirements
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:12/13/2021	6.02 C If a community wants to add interpretive signs (as an example) then would they need to amend their original master plan and go through the sign-permitting process?
#6753	8.02 General Sign Requirements
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	6.02 C If a project wants to add a sign, it would need to amend the existing master plan unless that sign is already permitted by the terms of the master plan.
#11054	8.01 Application of Sign Regulations

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"6.01 APPLICATION OF SIGN REGULATIONS As indicated in the comments to the Consultant's report, there may be a significant inconsistency/conflict or fatal flaw in the proposed ZOR Sign Ordinance. The ""Purpose"" section includes -- ""Ensure the compatibility of signs with land uses,"" -- ""Protect property values by facilitating the harmony between residential and commercial uses"" -- ""Complement the character of the comprehensive plan policy areas"" and -- ""Preserve the residential character of residential neighborhoods."" However, it has applied only one sign category to over 200,000 acres covering ARN, ARS, and A-10, all lumped as ""rural."" This lump ""rural"" categorization is conflicting and inconsistent with other policy areas/districts that identify sign regulations in the matrices differently for ""residential"" versus ""commercial."" This is where ""residential"" as a ""use"" creates a major problem, because applying only one set of regulations for all ""rural"" completely ignores/negates the fact that there are both residential and rural economy/business/commercial uses outside of the Suburban Commercial (SC), Rural Commercial (RC), and Village Commercial (VC) districts. Can Rural as a category be further broken down with two columns for all matrices? RURAL Rural Res Rural Econ/Comm/Bus ROUND 3 PUBLIC INPUT: Rural areas like other residential areas must be protected."</p>
#6498	8.01 Application of Sign Regulations
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Delete A. Content Neutral. In fact, a number of signs have limitations specifically because of their content, such as real estate signs and political signs. As I suggest, the easiest solution is just to delete this paragraph. It's not necessary anyway.
#6739	8.01 Application of Sign Regulations
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	This draft deliberately does not make content distinctions, as those are generally prohibited by First Amendment caselaw.
#6497	8.01 Application of Sign Regulations
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Findings, 2nd sentence. It should be "Protect" plural.
#6836	8.01 Application of Sign Regulations
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/3/2022	Changed to "protects."
#6496	8.01 Application of Sign Regulations

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	I compliment Mark for his excellent work on this.
#6740	8.01 Application of Sign Regulations
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	Thank you, Charlie!
#6495	8.01 Application of Sign Regulations
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Purpose statement: I strongly caution you NOT to use purpose language, or to use it only if there is a disclaimer early in the ZO that says it's for guidance only and that text controls. If you do not do this, I guarantee that there will be litigation when an applicant wants to find a loophole. Worse, a court may say that Purpose equals intent, an that intent supersedes text.
#6741	8.01 Application of Sign Regulations
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	I think it's a good idea to include a rule of interpretation about the role of purpose statements in Chapter 11. Purpose statements are commonly used to explain the intent of regulations, and with regulations that have First Amendment implications this is important to clarify the underlying public purposes.
#6486	8.01 Application of Sign Regulations
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:12/13/2021	6.01 E. Categories--I don't see CR districts. Will signage be regulated through VCOD?
#6742	8.01 Application of Sign Regulations
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	The current CR districts correspond to Village Residential (VR) in the draft ZO.
#6461	8.01 Application of Sign Regulations
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	"6.01 APPLICATION OF SIGN REGULATIONS As indicated in the comments to the Consultant's report, there may be a significant inconsistency/conflict or fatal flaw in the proposed ZOR Sign Ordinance. The ""Purpose"" section includes -- ""Ensure the compatibility of signs with land uses,"" -- ""Protect property values by facilitating the harmony between residential and commercial uses"" -- ""Complement the character of the comprehensive plan policy areas"" and --

ID	Section
	<p>""Preserve the residential character of residential neighborhoods."" However, it has applied only one sign category to over 200,000 acres covering ARN, ARS, and A-10, all lumped as ""rural."" This lump ""rural"" categorization is conflicting and inconsistent with other policy areas/districts that identify sign regulations in the matrices differently for ""residential"" versus ""commercial."" This is where ""residential"" as a ""use"" creates a major problem, because applying only one set of regulations for all ""rural"" completely ignores/negates the fact that there are both residential and rural economy/business/commercial uses outside of the Suburban Commercial (SC), Rural Commercial (RC), and Village Commercial (VC) district. Can Rural as a category be further broken down with two columns for all matrices? RURAL Rural Res Rural Econ/Comm/Bus"</p>
#6743	8.01 Application of Sign Regulations
<p>By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021</p>	<p>Yes - the sign regulations can distinguish rural residential from rural commercial districts. We will work on revising the tables to do that.</p>
#6460	8.01 Application of Sign Regulations
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021</p>	<p>"CONSULTANT'S REPORT, p. 20 Just to see if you're reading comments, my favorite sentence for this topic -- Pedestrian and Transit Users: ""... pedestrians tend to move at much slower speeds than motorists . . ."" I sure hope so, unless you've been watching too many superhero movies?!?"</p>
#6744	8.01 Application of Sign Regulations
<p>By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021</p>	<p>In addition to superheroes, some pro athletes can approach about 18 mph. Mortals like me move at much smaller speeds, especially when walking!</p>
#6459	8.01 Application of Sign Regulations
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021</p>	<p>"CONSULTANT'S REPORT, p. 15. Consultants confirm that, ""the County can set different sign type, dimensional and design standards by zoning district. This should reflect the district character, which in turn relates to the policy area and place types established by the Comprehensive Plan."" The ZOR draft does provide different sign regulation categories at a lower level than zoning district for TPA, SPA and UPA (i.e., the categories of commercial vs. employment/industrial vs. urban/mixed use. Therefore, why were similar sub-categorizations not applied to Rural?"</p>
#6745	8.01 Application of Sign Regulations

ID	Section
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	The rural districts tend to include a different range of uses than most residential districts to accommodate the County's agricultural economy. However, some are more residential in character, and I'll work on splitting those as well.
#6458	8.01 Application of Sign Regulations
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	"CONSULTANT'S REPORT, pp. 10 and 23. DARK SKY ORDINANCES. The report references to the night sky and other ""Dark Sky Ordinance"" impacts are important. Where and when will we see the regulations for ZOR/ZOC review and comment?"
#6746	8.01 Application of Sign Regulations
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	Exterior lighting standards are in section 5.12 of the draft. These do not include detailed foot-candle or related provisions found in more detailed "dark sky" ordinances. Section 6.08 has brightness standards, and lighting types are addressed for each sign type/district in 6.04 through 6.06.
#6457	8.01 Application of Sign Regulations
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021	"CONSULTANT'S REPORT, p. 7 Farm Signs -- The report defines ""Farm signs"" as "" Sign erected or maintained on any farm by the owner or tenant of such farm and relating solely to farm or horticultural produce, livestock, silviculture, or services sold, produced, manufactured or furnished on such farm."" We are back again to the question, ""What is the definition of a FARM?""IF any type of business operation is required by Code of Virginia (e.g., Sec. 4.1-206.1) to -- be located on a farm in the Commonwealth on land zoned agricultural and owned or leased, and -- agricultural products, including barley, other grains, hops, or fruit, used by such brewery in the manufacture of its beer are grown on the farm"" But does NOT produce the requirements outlined in Code of VA, then -- does it qualify as a ""farm""? and -- if not, should the business operation be reclassified as a commercial business instead of a ""farm"" for the purposes of sign regulations?"
#6747	8.01 Application of Sign Regulations
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	While staff is working on an updated definition of "farm," the sign report simply recognizes the existing definition of a "farm sign." The revised draft distinguishes between districts (recognized by the concurrence in Reed v. Town of Gilbert as a legitimate way to distinguish sign regulations) but not between users.
#6456	8.01 Application of Sign Regulations
By: Maura Walsh-Copeland Tags: zoc	"CONSULTANT'S REPORT, p. 5, footnote 1 states, ""Sign regulations do not define what constitutes an ""R"" DISTRICT. It is assumed for purposes of this discussion that this refers to "residential" districts other than those enumerated

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:12/12/2021</p>	<p>for the A-3 through CR category (R-1, R-2, R-3, R-4, R-8, R-16, R-24, PD-H, and PD-AAAR)." How does this ""discussion definition"" adequately address all the residential ""uses"" and locations in other districts, specifically ARN, ARS, A-10, JLMA? "</p>
<p>#6748</p>	<p>8.01 Application of Sign Regulations</p>
<p>By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021</p>	<p>The ARN, ARS, and A-10 districts are not described as residential districts, however, in the Categories (6.01.E) we include JLMA-1, JLMA-2, JLMA-3, JLMA-20 and JLMA-LN in the "Neighborhood" category.</p>
<p>#6455</p>	<p>8.01 Application of Sign Regulations</p>
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:12/12/2021</p>	<p>"CONSULTANT'S REPORT, p. 4 states for the, ""first category residential/ agriculture), it is not clear whether the category refers to districts (i.e., residential districts) or residential/agricultural uses (such as farms, regardless of a farm's zoning district)."" However, 1993 ZO Section 5-1200 clearly shows for - Residential/ agricultural: HOA activity signs, Farm signs, and wayside stand (incl. Christmas Tree, Vineyard/wineries) in this category are a combination of residential and commercial uses.-- Business signs: Bed & Breakfast Inn and Homestay, Country Inn, Guest Farm or Ranch, Rural Retreat, Rural Resort, and Rural Agricultural Corporate Retreat, with no reference to many other business types.1. The current ZO 1993 acknowledges business/commercial signs in the rural area; why does the ZOR draft not include the same categorization? 2. The current ZO 1993 identified vineyard/winery sign requirements by example for residential/agricultural. Why does ZOR draft for those and other specific uses that are clearly non-residential business operations required to be on a ""farm"" not make an equivalent/consistent categorization?"</p>
<p>#6749</p>	<p>8.01 Application of Sign Regulations</p>
<p>By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021</p>	<p>The draft avoids user-based categories or preferences. User preferences can have the same legal effect as content preferences, particularly when the use distinctions are so narrowly defined that they appear to preference some messages over others. That is why this draft draws distinctions between sign regulations based on districts or very broad categories (e.g., residential v. non-residential), rather than narrowly targeted uses.</p>
<p>#6839</p>	<p>Chapter 8: Signs</p>
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022</p>	<p>ENCODE COMMENTS FROM STAFF FOR: When will the Staff comments on the SIGNS packet be distributed?</p>
<p>#6897</p>	<p>Chapter 8: Signs</p>
<p>By: Ryan Reed</p>	<p>Comment report is currently being compiled.</p>

ID	Section
Tags: staff ryan.reed@loudoun.gov Date:1/3/2022	
#6517	Chapter 8: Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	Mark's paper suggested some good ideas, such as not allowing political signs more than 60 days before an election. I'd like to se ZOC brainstorm that part of the report. For example, is ANY flag permitted, or only those of a government? Can HOAs ban signs, and if so, what kinds of signs.Like many things brought to ZOC, this section would benefit from general discussion.
#6731	Chapter 8: Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	Noted. Political signs are folded into an overall temporary sign category because we cannot call signs out based on their message. However, we can establish content-neutral time limits for temporary signs in general. The same applies to flags - we have to treat flags the same way regardless of their message or user. HOA rules are not affected by the ZO - those are a matter of private contract.
#6514	Chapter 8: Signs
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/13/2021	This section badly needs a Definitions section, perhaps with illustrations.
#6732	Chapter 8: Signs
By: Mark White Tags: staff mwhite@planningandlaw.com Date:12/23/2021	Definitions are provided in Chapter 11. We'll add illustrations later. It probably makes sense to have those in the tables located in sections 6.04 - 6.06. In some sign codes, I embed the definitions in the tables, with a cross-reference in the definitions. This tends to keep most of the applicable regulations and definitions together. With enCode's hyperlinking capabilities, however, it probably makes sense to keep the definitions in Chapter 11.
#11014	7.09 Owners Associations
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	5.10.A.8 HOMEOWNER'S ASSOCIATION REQUIREMENTS. States that up to date contact information for the HOA must be provided to the County when approved or modified "whenever it changes," but within what timeframe?
#9980	7.09 Owners Associations
By: Packie Crown Tags: zoc	The County can obtain the contact information for OAs/HOAs from the SCC. Why add another layer of reporting on OAs/HOAs? More reporting requirements

ID	Section
<p>pcrown@bowman.com Date:5/11/2022</p>	<p>equates to additional costs to the OAs/HOA and to the respective OA/HOA. Has the County experienced significant issues with the current requirements for forming and recording OAs/HOAs. IF not, this section seems excessive.</p>
<p>#7681</p>	<p>7.09 Owners Associations</p>
<p>By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:1/24/2022</p>	<p>Can the County prohibit an HOA prohibition on connecting to streets and pedestrian trails?</p>
<p>#7745</p>	<p>7.09 Owners Associations</p>
<p>By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022</p>	<p>This will need consultation with County Attorney who has made a significant number of substantive comments.</p>
<p>#7331</p>	<p>7.09 Owners Associations</p>
<p>By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:1/16/2022</p>	<p>A.5 " by laws" find and replace with bylaws</p>
<p>#7746</p>	<p>7.09 Owners Associations</p>
<p>By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022</p>	<p>This can be done. There are a significant number of comments and this can be included when they are addressed.</p>
<p>#7330</p>	<p>7.09 Owners Associations</p>
<p>By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:1/16/2022</p>	<p>A.5 "Regulations" is too broad of a term and could fold in minutiae like design guide changes, creation of new committees, etc, which should not raise to the county level. Suggest that focus should be on changes/amendments to an HOA's Articles of Incorporation or Declaration documents. Should be confirmed with Loudoun legal dept. as well. Suggest 90 days for submission. Also, it would make sense to list where such notifications should be sent.</p>
<p>#7747</p>	<p>7.09 Owners Associations</p>

ID	Section
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	Acknowledged. Several ZOC members have made similar comments regarding being more specific about HOA regulation changes of interest to the County and others that are not. County Attorney will be consulted on many needed changes including this one.
#7327	7.09 Owners Associations
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.10 HOMEOWNERS ASSOCIATIONS How much of this is already in or should be in the LSDO instead of the Zoning Ordinance? With this designated section, eliminate the separate sections (or at least the common clauses)included under the zoning district and development option sections.
#7772	7.09 Owners Associations
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	HOA's appear to be "regulated" more by the Code of VA than the FSM or LSDO. County Attorney has made significant comments of a similar nature so these concerns will be addressed at the same time.
#7326	7.09 Owners Associations
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5-10A. HOMEOWNERS ASSOCIATIONS Aren't these state requirements of any HOA?Can't we just say HOA will meet state requirements and eliminate clauses 1,2,3,4,6 & 7 ?
#7773	7.09 Owners Associations
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	Pursuant to similar comments, revisions may be made to address repetition of requirements in Code of VA although some sections referenced here are not included in State code.
#7293	7.09 Owners Associations
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	"5.10.D.3.a HOA ESTABLISHMENT. States that, ""Membership in the HOA must be mandatory for all residential property owners, present or future . . . "" However, the definition states ""each lot and/or homeowner in a clustered or planned development is automatically a member."" There is an inconsistency in the language using ""lot,"" homeowner"" and ""residential property owner."" Example: clusters are planned to have Prime Farmland Lots (PFLs) and Rural Economy Lots, both of which may or may not have a home or ""residential"" property owner. Would all still be required to be members in the HOA? If so, language should be made more consistent."

ID	Section
#7749	7.09 Owners Associations
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	Inconsistencies in terminology will be addressed.
#7292	7.09 Owners Associations
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.10.C.4 HOA APPLICABILITY. "The landowner must submit documents for creation of the HOA . . ." This could be confused by resident landowner vs. developer landowner. Can the reference be made more clear?
#7750	7.09 Owners Associations
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	It applies to any landowner creating an HOA but this can be clarified.
#7291	7.09 Owners Associations
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.10.C.3 HOA APPLICABILITY. Typo? "The developer must 'finally' determine and make known the choice of an HOA . . ."
#7751	7.09 Owners Associations
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	It's intended to mean that the developer must make a final decision by record plat or site plan. It has been revised.
#7290	7.09 Owners Associations
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.10.C.2. HOA STANDARDS. HOA/Applicability. Word "space" missing after third word.

ID	Section
#7752	7.09 Owners Associations
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	Word inserted per comment.
#7289	7.09 Owners Associations
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.10.A.8 HOMEOWNER'S ASSOCIATION REQUIREMENTS. States that up to date contact information for the HOA must be provided to the County when approved or modified "whenever it changes," but within what timeframe?
#7753	7.09 Owners Associations
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	This item is likely to be revised per County Attorney comments and an appropriate time frame can be included if determined appropriate.
#7239	7.09 Owners Associations
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	HOAs. I strongly suggest that developers grant a permanent easement or a covenant that estops HOAs from imposing any strictures that prevent farming that is otherwise covered by the ight to Farm Act. (I believe that absent such document, HOA rules could trump the Right to Farm Act.
#7748	7.09 Owners Associations
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	Similar concerns raised by other ZOC members and the subject will be discussed with County Attorney.
#7528	7.08 Utilities
By: John Merrithew Tags: zoc Date:1/20/2022	5.a. Is the exemption for individual user, service connections consistent with past practice? I thought all utilities in a subdivision have to be underground?
#8003	7.08 Utilities
By: Mark Holland Tags: staff	This language, with exception to the 138 kV references, is carryover language from the current code.

ID	Section
mark.holland@loudoun.gov Date: 1/26/2022	
#7527	7.08 Utilities
By: John Merrithew Tags: zoc Date: 1/20/2022	4.a. And b. Another reference to public water and sewer in the rural area. Please confirm we are consistent with Plan policy.
#8004	7.08 Utilities
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date: 1/26/2022	This language is carryover language from the current code and should be consistent with plan policy.
#7526	7.08 Utilities
By: John Merrithew Tags: zoc Date: 1/20/2022	3. Refers to rural villages. Yet subsection b. permits public water and sewer systems. I thought the Plan opposes public/central sewer and water in the rural area except for specific purposes. Are we referring to communal systems operated by Loudoun Water?
#8006	7.08 Utilities
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date: 1/26/2022	This is carryover language from the current code. It's my understanding that although located within a Rural Policy Area a PD-RV would need to meet this requirement.
#7525	7.08 Utilities
By: John Merrithew Tags: zoc Date: 1/20/2022	C.2.d. In the JLMA there is no limit on the number of drain fields that can locate on the open space. Unlike the 70% cap on offsite drain fields in the rural area. Is the difference intentional?
#8007	7.08 Utilities
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date: 1/26/2022	This is carryover language from the current code. The understanding is this distinction was intentional.
#7524	7.08 Utilities
By: John Merrithew Tags: zoc	C.2.a. What is the objective of setting a 70% limit on offsite drain fields?

ID	Section
Date:1/20/2022	
#8008	7.08 Utilities
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:1/26/2022	This is carryover language from the current code. Staff can discuss any possible revisions to this percentage.
#7501	7.08 Utilities
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/19/2022	C.5.a. Exemptions is confusing: it says transmission lines are excluded, then says "but not including substations, transmission lines....."
#8001	7.08 Utilities
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:1/26/2022	Revised transmission line requirement to include those less than 138 kV. Transmission line of less than 138 kV can be located underground.
#7500	7.08 Utilities
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/19/2022	Transmission line exclusion should be 120kv or more, as the intent appears to exclude transmission lines
#8002	7.08 Utilities
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:1/26/2022	The 138 kV requirement is established by the Code of Virginia. Staff revised this section to be consistent with the state code.
#7303	7.08 Utilities
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.02.C.2 UTILITIES. SPECIFIC STANDARDS. Rural Policy Area District. As indicated for ZOAM-2020-0002, allowing, "a maximum of 70% of the lots may have primary and or reserve septic fields within common open space" is excessive and contrary to the goals of the ZOAM. If the ZOAM modifies this then it will also be changed here, correct?
#7396	7.08 Utilities

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	That is correct. The ZOAM will provide the guidance for changing this text. Currently this is carry-over language.
#7246	7.08 Utilities
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/16/2022	Offsite water and sewer is/will be allowed in Cluster Subdivisions, which is conflict this section. Are there other exceptions? Should they all be listed here?
#7397	7.08 Utilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	Approval of ZOAM-2020-0002 will supersede this text and will revise the conflicts in this section.
#7225	7.08 Utilities
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	4.b.1.a This should be for septic systems and for alternative systems' discharge areas.
#7398	7.08 Utilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	Language corrected to defined term "Individual sewage disposal system" which includes the septic tank, conveyance line and absorption field.
#7224	7.08 Utilities
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	4.a.1.a I like this language about individual wells. Why not use this language in cluster standards?
#7399	7.08 Utilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	Noted. Will pass this comment on the the ZOAM-2020-0002 project manager.
#7223	7.08 Utilities

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	3. Rural Villages. Many of the "village" terms used here are not in the existing ZO. Note that "Rural Village" is not a defined term in the old ZO. The definitions in the ZOR should mesh with language in this subsection.
#7400	7.08 Utilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	This term is found within existing Section 4-1200, but yes, agreed that all terms need to be consistent throughout the ZOR.
#7222	7.08 Utilities
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	C.1.b.2 There is a difference between "communal water" and a cluster of individual wells located on open space.
#7402	7.08 Utilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	Yes, a communal system is a owned or operated by Loudoun Water, from its source water, in this case a well or group of wells. Individual wells, if allowed and eased in open space, serve an individual lot and are not owned or operated by Loudoun Water.
#7221	7.08 Utilities
By: Charles Houston Tags: zoc cghnodrog@yahoo.com Date:1/15/2022	C.1.a. These standards should align with the new lot classifications for cluster projects - BDO, RCL, PFL, REL and OSL.
#7403	7.08 Utilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	When ZOAM-2020-0002 is adopted, this section will be revised accordingly.
#7220	7.08 Utilities
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	C.1.a.1.b. Make "system" plural -"systems." Here's why: A project may have smaller lots where water systems (in this case, multiple wells) are located in clusters on open space
#7404	7.08 Utilities

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/18/2022	We will review this language with Loudoun Water, but it is likely that multiple communal systems within a single cluster subdivision are a) not allowed by LW and b) cost prohibitive. It is more likely that a single system serving the community, but sourced by multiple wells would be used.
#7219	7.08 Utilities
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 1/15/2022	B.1.d. Does this apply to public utilities?
#7407	7.08 Utilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/18/2022	It applies to all utilities except those that are exempt in 5.02.05
#7218	7.08 Utilities
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 1/15/2022	B.1.a. Does this undergrounding requirement apply to public utilities as they pass by, or just to homeowners?
#7408	7.08 Utilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/18/2022	It applies to all utilities except those that are exempt in 5.02.05
#7217	7.08 Utilities
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 1/15/2022	B.1.a. Does this undergrounding requirement apply to public utilities as they pass by, or just to homeowners?
#7409	7.08 Utilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/18/2022	It applies to all utilities except those that are exempt in 5.02.05
#7682	7.07.04 Visibility at Intersections

ID	Section
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date: 1/24/2022	Why can't we simply refer to VDOT standards and require all streets, private or public need to meet the standards.
#7774	7.07.04 Visibility at Intersections
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/24/2022	Although VDOT standards seek to protect visibility at intersections, they are related to the road classification and speed limit. Depending on conditions and variables they can be much more restrictive. The current proposal is designed to preserve and clarify the current County methods.
#7295	7.07.04 Visibility at Intersections
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.11.B. VISIBILITY AT INTERSECTIONS. Standards. It is nice to know that "no impediment to visibility is to be placed, allowed to grow, erected, or maintained" but enforcement is terrible. How many intersections set signs and lines so far back or have landscaping obscuring the view that you can't see oncoming cross traffic? At times landscaping obscures the signed themselves too. How will County and VDOT enforcement be improved to ensure compliance?
#7775	7.07.04 Visibility at Intersections
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/24/2022	Improvements to enforcement would be included in Chapter 10 under Zoning Administrator duties which is still under development.
#7294	7.07.04 Visibility at Intersections
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.11. VISIBILITY AT INTERSECTIONS. PURPOSE. Add the same bullet as Open Space and Homeowner's Association Standards: "Promote the public health, safety and welfare."
#7776	7.07.04 Visibility at Intersections
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/24/2022	This statement is made in the Purpose statement for the entire Ordinance at 1-102. There is still debate about whether it should or needs to be restated in each chapter. The recommendation is noted.
#9576	7.07.04 Visibility at Intersections
By: Steve Goodrich	Revised

ID	Section
Tags: staff steve.goodrich@loudoun.gov Date:4/9/2022	
#7251	7.07.04 Visibility at Intersections
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/16/2022	Add language to say that in following these provisions, there is no requirement to remove existing stone walls or farm fences, nor to remove any tree with a caliper of 4" or more (measured 2' above grade,) nor to require any grading.
#7785	7.07.04 Visibility at Intersections
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	There may be merit in some additional exemptions and they will require careful consideration and construction of language since some will be existing and the requirements will apply to new applications. "Allowed to grow" and "maintained" will require special attention.
#7250	7.07.04 Visibility at Intersections
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/16/2022	EXECPTIONS: Please add these as other exceptions by saying the visibility triangles shall not apply to roads within a Historic Roadway District, within rural villages, or roads deemed eligible by the VA Dept. of Historic Resources as being eligible for listing on the National Register of Historic Places.
#7787	7.07.04 Visibility at Intersections
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	Acknowledged. We will be seeking input from historic district advocates.
#7249	7.07.04 Visibility at Intersections
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/16/2022	Until we see diagrams, the geometry of these visibility triangles is incomprehensible.
#7788	7.07.04 Visibility at Intersections
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	Fully intend to provide illustrations to clearly represent the simplified but expanded language.

ID	Section
#7248	7.07.04 Visibility at Intersections
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/16/2022	I AM VERY CONCERNED that these visibility standards could seriously damage many elements that add to the character of the RPA. I doubt if these strictures would be met by more than a few intersections and driveway entrances. See next comment.
#7791	7.07.04 Visibility at Intersections
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	It will be a difficult balancing act since it's a public safety concern. As with all revisions, it will receive serious consideration. These new standards will apply to new applications and there may be other options to removal.
#7240	7.07.04 Visibility at Intersections
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	5.11 Viz at Intersections. These should not apply in the RPA for single-family residential or farm uses if (1) the road is unpaved, and (2) less than 30 homes use that intersection.
#7795	7.07.04 Visibility at Intersections
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	This suggestion is acknowledged and appreciated and will be considered in any revisions or additions to this chapter intended to protect public safety. However it is a matter of safety that should apply everywhere.
#14141	7.07.03 Pedestrian and Bicycle Network
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.09.03.A.2.The only reference to adequate lighting for a bicycle and pedestrian network references underpasses or tunnels. There should be a requirement for ample and appropriate lighting for network paths that provide interconnections between uses in and between suburban and urban uses and in JLMA areas connecting to towns and developments in order to ensure safe passage at night.
#10462	7.07.03 Pedestrian and Bicycle Network
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/3/2022	I suggest dropping the "...and predominantly straight" term. Sidewalks will follow streets and when they do not, then design should be based on most direct, easily accessible connection, with least environmental disturbance. Table -1. Sets sidewalk widths that seem excessive (except for shared use paths) as a district wide standard. Not clear why the wider widths are needed. They will contribute to heat island effects in urban environments communities. Suggest why and when such widths are required.

ID	Section
#14015	7.07.02 Road Network
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.09.02.A.2 General Requirements Add 2.b.To the extent feasible, road networks should be designed to create intersections and blocks that maximize north/south building orientation and increase energy efficient design.
#13792	7.07.02 Road Network
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.09.02.A.2.b. Add new text to require compliance with VDOT wildlife collision avoidance guidelines.
#10999	7.07.01 Road Access
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.09. TRANSPORTATION, ROAD ACCESS STANDARDS. F. USE SPECIFIC ROAD ACCESS STANDARDS. The volume of traffic on all roads is directly dependent on the quantity of residential and commercial properties accessing the road, as well as the volume of patrons to commercial entities. The re-written footnote for Table 5.09.01Road Access Standards (former Table 5-654) no longer states that Vehicle trips Per Day are to be ""calculated,"" which is good. However, it now states that Vehicle Trips per Day (VTD) must be ""determined by traffic study if required or as estimated based on proposed use and most current edition of ITE Trip Generation Rate or an approved substitute. 2022 Round 3 Input. Reiterating Questions: 1. Traffic studies are common for large developments in SPA, TPA and possible large RPA. The primary issues causing complaints have been for commercial entities located on public unpaved roads or smaller paved roads. When in the process will the ""traffic study"" or equivalent be required in the permitting process? when evaluated? when is compliance confirmed? Or will it remain, as has been and problematic, only by complaint? 2. Whose responsibility will it be to estimate the VTD ""based on proposed use? 3. Whose responsibility is it to determine what is an ""approved substitute? 4. Whose responsibility is it to enforce when a Special Exception Review is required? Traffic caused by HIGH-INTENSITY USES has been an issue for many years, with poorly collected information during permitting, county approvals of permits without verification, and lax enforcement for traffic levels that should have required special exception review. "
#9981	7.07.01 Road Access
By: Packie Crown Tags: zoc pcrown@bowman.com Date:5/11/2022	Who determines the amount of the reserve fund that is required by Section 5.09.01.C.3?
#7683	7.07.01 Road Access

ID	Section
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:1/24/2022	Suggest the Ordinance rely on State standards for all roads and access easements...
#8036	7.07.01 Road Access
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	We will take this under consideration while revising.
#7674	7.07.01 Road Access
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	Road access and parking challenges are intertwined in SFA and MF stacked/attached neighborhoods. Staff thoughts on whether this need to be addressed solely in the parking section, or could it also be addressed through certain street width requirements in such neighborhoods?
#8037	7.07.01 Road Access
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Agreed, staff will specifically looking at most appropriate locations in the ordinance during the revisions.
#7325	7.07.01 Road Access
By: Eric Zicht Tags: zoc zicht@erols.com Date:1/16/2022	5.12 This largely seems redundant of the FSM, where such standards seem more appropriate. Other parts duplicate the LSDO
#7474	7.07.01 Road Access
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/18/2022	I agree. We should strive to eliminate ZO language when all its doing is repeating the FSM or LSDO. Duplicating the wording will ultimately create conflict when one is edited and the others are not. Or typos enter the picture.
#8038	7.07.01 Road Access
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Agreed. Staff will take under consideration during our revisions.

ID	Section
#7296	7.07.01 Road Access
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022</p>	<p>"5.12. ROAD ACCESS STANDARDS. F. USE SPECIFIC ROAD ACCESS STANDARDS. The volume of traffic on all roads is directly dependent on the quantity of residential and commercial properties accessing the road, as well as the volume of patrons to commercial entities. The re-written footnote for Table 5.12 Road Access Standards (former Table 5-654) no longer states that Vehicle trips Per Day are to be "calculated," which is good. However, it now states that Vehicle Trips per Day (VTD) must be "determined by traffic study if required or as estimated based on proposed use and most current edition of ITE Trip Generation Rate or an approved substitute. Questions: 1. Traffic studies are common for large developments in SPA, TPA and possible large RPA. The primary issues causing complaints have been for commercial entities located on public unpaved roads or smaller paved roads. When in the process will the "traffic study" or equivalent be required in the permitting process? when evaluated? when is compliance confirmed? Or will it remain, as has been and problematic, only by complaint? 2. Whose responsibility will it be to estimate the VTD "based on proposed use? 3. Whose responsibility is it to determine what is an "approved substitute? 4. Whose responsibility is it to enforce when a Special Exception Review is required? Traffic caused by HIGH-INTENSITY USES has been an issue for many years, with poorly collected information during permitting, county approvals of permits without verification, and lax enforcement for traffic levels that should have required special exception review. Why rewrite a Zoning Ordinance if the known issues will not be addressed and fixed?"</p>
#8039	7.07.01 Road Access
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/26/2022</p>	<p>Staff will take these comments under consideration.</p>
#7241	7.07.01 Road Access
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 1/15/2022</p>	<p>C. Private streets. Why don't these provisions apply to residential developments in the RPA? Private roads are the norm in clusters and common in Hamlets and AR-3. In my experience there is frequent squabbling among residents as to maintenance decisions and costs. The ZOR can help.</p>
#8040	7.07.01 Road Access
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/26/2022</p>	<p>Noted. Previous comments regarding the standards in the FSM and duplicative standards is pertinent.</p>
#13750	7.06.13 Specific Residential Design Type Parking
<p>By: Rich Brittingham</p>	<p>o Proximity reduction is insignificant - 15% reduction for 2 BR DU = 1.7 sp/DU</p>

ID	Section
Tags: zoc rbrittingham@dewberry.com Date:7/18/2022	- Compare to Fairfax County for parking in 'Planned Tyson's Corner' urban district: - 1/8th mile: min 1space for 1-3 BR DU -1/4 mile:min 1space for 1-3 BR DU -1/2 mile: 1.4 for 1 BR, 1.7 for 2 BR
#2455	7.06.13 Specific Residential Design Type Parking
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/20/2021	5.05.14.B.4. Rory (and others) - I'd like to remove on-street parking from counting towards parking requirements, in all policy areas. This will have aesthetic, safety and traffic benefits.
#2270	7.06.13 Specific Residential Design Type Parking
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/19/2021	SFA and multifamily typical layouts are not typical; SFA typically have a garage inside the unit and may also have a private driveway. Multifamily typical layouts do not encompass all of the various scenarios for parking, again some may have private garages and driveway spaces. Are these suggestions or changes to what we see today?
#2425	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/20/2021	Staff indicated that residential parking needed to be addressed. The goal is to limit residential parking where appropriate. Additional clarification can be made to the typical layouts.
#2269	7.06.13 Specific Residential Design Type Parking
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/19/2021	Why are we limiting single family detached dwellings? Does a 36-foot long driveway count as four spaces such that with two car garage a detached SFD would compute six parking spaces, which would be disallowed? What if someone wants to add a carriage house or accessory use that would provide space that would count for more parking?
#2427	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: rwilson@planningandlaw.com Date:7/20/2021	Accessory units will have their own rate. Accessory rates were omitted per internal discussion.
#2268	7.06.13 Specific Residential Design Type Parking
By: Matt Lawrence Tags: zoc	MF Parking table- #/BR seems incorrect as a 3 bedroom unit would require 6 spaces?

ID	Section
mlawrence@pennoni.com Date:7/19/2021	
#2435	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/20/2021	Can you explain how you got that number? If you have a 3 bedroom unit in the SPA, required parking would be 2.5 minimum and 2.75 maximum.
#2252	7.06.13 Specific Residential Design Type Parking
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.14(D) SPECIFIC RESIDENTIAL DESIGN TYPE PARKING MATRIX. An development industry expert found the Graphics in Section 5.05.14 are very confusing. Have these been reviewed outside of Staff? If not, I'm assuming they will be before 2022 public input. (UHN-C)
#2428	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/20/2021	This was an internal review to this point. Could you please provide more feedback regarding what was confusing about them so that appropriate revisions can be considered?
#2251	7.06.13 Specific Residential Design Type Parking
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	"5.05.14(C) SPECIFIC RESIDENTIAL DESIGN TYPE PARKING MATRIX--Table 5.05.14-1 Specific Residential Design Types Parking Ratios. Please see Section 5.05.09(I), above, for a discussion of why ""Use"" (Bedroom Types) may not be a useful metric for specifying parking required for multi-family affordable housing. For the reasons explained there, multi-family affordable housing should be considered for exemption from this table." (UHN-C)
#2437	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/20/2021	Affordable housing can opt for various the parking adjustment options.
#2230	7.06.13 Specific Residential Design Type Parking
By: John Merrithew Tags: zoc Date:7/17/2021	I suggest deleting this section.
#2429	7.06.13 Specific Residential Design Type Parking

ID	Section
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/20/2021	Could you please provide the reasoning so that we can respond?
#2229	7.06.13 Specific Residential Design Type Parking
By: John Merrithew Tags: zoc Date:7/17/2021	As stated before, setting maximum parking in residential areas is unnecessary. In rural areas in particular, setting maximums is unnecessary.
#2430	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/20/2021	That's fair. Maybe no max makes the most sense in rural areas.
#2225	7.06.13 Specific Residential Design Type Parking
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/15/2021	5.05.14-1 table. Even a maximum of 5 spaces per du is insufficient in the RPA, even for large homes on smaller lots. At a minimum, try an acreage solution: If a property is over 10 acres, then no maximum.
#2438	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/20/2021	I appreciate this response. Thanks for providing a potential solution from your lens. We'll discuss with staff.
#2224	7.06.13 Specific Residential Design Type Parking
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/15/2021	5.05.14.B.4. Do NOT allow on-street parking to count towards minimum parking in residential districts. It would be just another excuse by a builder to cut corners, leaving a neighborhood with cluttered and unsafe streets.
#2439	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/20/2021	Thanks for the response. Should on-street parking be removed as an option in every Policy Area?
#2119	7.06.13 Specific Residential Design Type Parking

ID	Section
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/10/2021	This section leaves me utterly confused. I do not understand the different design types referenced in 'A'. 'B' mentions garages, but 'D' shows no diagram with traditional garages below living units. I can imagine that in Urban districts we would want to eliminate multiple curb cuts for front loaded garages, but why would we eliminate them from the alley side? Then, our use tables in section 3.02 do not show these sorts of homes in the Rural areas except 'VC', yet this table implies their presence.
#2441	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/20/2021	These are only for SFA (townhomes) and Stacked MF units. Staff specifically asked for these residential development types to be accounted for. For the use table, we will continue to work with staff to get uses right.
#1898	7.06.13 Specific Residential Design Type Parking
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.14(B)(3) SPECIFIC RESIDENTIAL DESIGN TYPE PARKING. Draft text indicates garage and driveway parking spaces "MAY" count toward required spaces for res. dwelling units. When, how and where WILL this apply?
#2003	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	This could be revised to "must" however, the intent was to provide flexibility. Therefore, if an applicant may opt to use the garage or driveway to meet parking ratios, or they may provide the parking exclusive of these areas.
#1872	7.06.13 Specific Residential Design Type Parking
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:7/5/2021	There is significant focus to control overparking in single family attached and multifamily design types. This is not a problem that exists in Loudoun and the issue is quite the opposite with these communities being grossly underparked. Ratios need to be increased to accommodate reality. Because margins are skewed to favor development of housing over parking, builders will use the minimum parking standards to drive design. Accordingly, the minimums should be set to 2/DU for Single Family attached and stacked multi-family. Mutlti-family minimums should be 1BR/1.5, 2BR/2, 3BR/2.5 across all policy areas. Maximums are economically self-governing and the concept of managing them is questionable seemingly addressing a problem that does not exist. For commercial retail, past standards over prescribed parking which is now being addressed and adjusted to reality. The same consideration needs to be given to residential parking.
#2000	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff	Thank you for the detailed comment. In future iterations, the ratios will be further refined. Residential parking has been identified a significant concern but

ID	Section
rwilson@planningandlaw.com Date:7/6/2021	discussion necessary. While maximums may be self governing, which is the overall intent of not providing maximums in Rural Policy, maximums are mostly needed in Urban and Suburban Policy Areas where the intent is to promote density and walkability. Ultimately, we are trying to align parking ratios and methods with the goals of the Loudoun County 2019 General Plan. The Zoning Ordinance should provide regulations that achieve those goals.
#9280	7.06.13 Specific Residential Design Type Parking
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:3/28/2022	adjusted
#1862	7.06.13 Specific Residential Design Type Parking
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Like that single table includes all policy areas. Maximum # of vehicles is too low. Many families have more cars. Young couples in one-bedroom apartments often have to have two cars to commute to different work places. Illogical - a 3 bedroom apartment can have 7.5 parking spaces, but a one bedroom only 1.5. (If reversed, it would be three bedrooms 4.5 parking spaces, one bedroom 2.5 spaces)
#2001	7.06.13 Specific Residential Design Type Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	A 3 bedroom apartment should have 2 to 2.5 parking spaces. A different metric to measure or omit the BR metric in the apartment section to clarify may be appropriate. The intent was for it for it to read: 3+ bedrooms = 2 space minimum with a 2.5 maximum.
#13355	7.06.12 Village Parking
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	5.05.12 Village parking standards are too prescriptive in advance of small area plans for the individual villages to know what's appropriate in each case.
#2266	7.06.12 Village Parking
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/19/2021	5.05.13 VILLAGE PARKING. The Loudoun Historic Village Alliance (LHVA) would like to remind the county that the villages have survived just fine since the invention of the automobile. Bluemont Fair parks 600 -1000 cars daily, Philomont's VFD Pit BBQ parked 100 - 200 cars, Waterford Fair 3,000 cars daily, Lucketts events and Aldie Fair. The villages do not want any parking regulations. No parking minimums for non residential use in villages or off-street parking. Parking regulations would ruin our rural historic villages. For decades, businesses have come up with work arounds by working with their neighbors.

ID	Section
	We do not want staff to confuse towns with villages. WE OFFER VILLAGE TOURS IF NEEDED BY ANYONE. LHVA.
#2417	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Thank you for the comments. We will continue to refine the text to make parking regulations that fit the villages.
#2265	7.06.12 Village Parking
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/19/2021	When a Use for an historic property is proposed, it is often difficult to meet parking standards. There may be no area for on site parking, No access to the rear of the property, no space in front. So parking requirements need to be flexible in Villages. Zoning and the owner work out a solution that works for both parties in specific instances. Workarounds are happening for residents, but it is Uses of non-residential structures where there is sometimes a problem.
#2418	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Understood. The idea was that the shared parking allowed for in Section 5.05.13.C would help address this concern.
#2264	7.06.12 Village Parking
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	3D--This section is probably irrelevant for most villages, but why is it not mentioned for other policy areas that may need them?
#2419	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Please clarify the reference to the section "3D" so we may address this comment.
#2263	7.06.12 Village Parking
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	The table of uses for village parking is largely irrelevant and the section is as well. The Loudoun Historic Village Alliance will have input.
#2420	7.06.12 Village Parking

ID	Section
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	We would like to hear more information as to why the table of uses and the section is largely irrelevant so that we may address this comment.
#2236	7.06.12 Village Parking
By: John Merrithew Tags: zoc Date:7/17/2021	F. Compact/Walkable... refers to 5.05.11.E, which describes parking garages. Is that intended or desirable in a village?
#2421	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Agreed. The idea of compact/walkable villages is desirable but not parking garages. Draft text needs to be clarified.
#2235	7.06.12 Village Parking
By: John Merrithew Tags: zoc Date:7/17/2021	Suggest deleting D.3.d.
#2422	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Understood. Based on these comments, will consider whether RPPDs are appropriate in the villages.
#2234	7.06.12 Village Parking
By: john Merrithew Tags: zoc Date:7/17/2021	Suggest removing D.3.d.
#2423	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Understood. Based on these comments, will consider whether RPPDs are appropriate in the villages.
#2233	7.06.12 Village Parking

ID	Section
By: John Merrithew Tags: zoc Date:7/17/2021	How is a parking lot defined? Does it apply to a residence? Small commercial uses? There is no minimum number of parking spaces stated for E.3.
#2424	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	A parking lot will be defined and is currently defined in the Zoning Ordinance. A parking lot is not associated with a residence.
#2232	7.06.12 Village Parking
By: John Merrithew Tags: zoc Date:7/17/2021	Are the street sections proposed for the various onstreet parking scenarios the minimum required by the FSM and Fire Code?
#2426	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Yes. The Department of Building and Development and the Fire Marshall's Office will continue to be involved in the review of draft text.
#2128	7.06.12 Village Parking
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/11/2021	Having looked back at the 93 ordinance, I am reminded that the old PD-RV is now RV, and thus this section seems relevant to RV. Is that the case? It is not clear in the text.
#2155	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/12/2021	This section applies to the currently mapped Village Conservation Overlay Districts, not the PD-RV zoning districts.
#2125	7.06.12 Village Parking
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/10/2021	I really question whether this section is really necessary as a specific section...
#2156	7.06.12 Village Parking
By: Rory Toth	Understood. Perhaps it can be added to the Parking Ratios Section 5.05.03.

ID	Section
Tags: staff rory.toth@loudoun.gov Date:7/12/2021	
#2124	7.06.12 Village Parking
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/10/2021	Relative to the number of spaces per use in the table, why should the number of required spaces be any different than if the use were other than in a village? If not, why do we have a special table for village parking?
#2431	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	The idea was to create parking ratios and parking regulations that help fit to the villages uniqueness and not a one size fits all approach to parking in all parts of the County.
#2123	7.06.12 Village Parking
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/10/2021	Given my comments about breadth of uses in villages, villages needs to be studied better before parking in them is finalized.
#2433	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Understood.
#2122	7.06.12 Village Parking
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/10/2021	In a village, I would expect to find only on-street parking or parking in personal driveways/garages. This goes hand-in-hand with my previous comment about the breadth of uses. The uses should be severely curtailed to avoid need for off-street parking lots.
#2434	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Understood. The development of uses in the new zoning ordinance will drive the need for parking in the villages.
#2121	7.06.12 Village Parking

ID	Section
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/10/2021	I made a similar comment on the Use Table for villages -- This comprehensive list of uses does not sound like what you would expect in a 'village'. One living in a village would expect to go to town to find this broad list.
#2436	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Understood. The development of uses in the new zoning ordinance will drive the need for parking in the villages.
#1897	7.06.12 Village Parking
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.13 VILLAGE PARKING, Under review by LCPC member organization experts.
#1861	7.06.12 Village Parking
By: Eric Zicht Tags: zoc zicht@erols Date:7/3/2021	Village regulations merit a separate ZOAM with stakeholder meetings and provision for input from residents.
#2081	7.06.12 Village Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Thank you for the feedback. Villages will be discussed during the Zoning Districts discussion and revaluation of processes and review of potential small area plan updates for individual villages is a consideration.
#2267	7.06.11 Residential Parking Limitations
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/19/2021	Understand the 30% limitation is to prevent a sea of parking in the front yard, but this can encourage houses being set back further from the road to increase the yard area and discourage widths of the driveways being the same as the width of the garage for their entire length, which is an FSM requirement.
#2284	7.06.11 Residential Parking Limitations
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Understood. We will take this into consideration when drafting zoning district regulations.

ID	Section
#2250	7.06.11 Residential Parking Limitations
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.12 RESIDENTIAL PARKING LIMITATIONS. Parking in front yards. If limited to 30%, then most townhomes with garages would be eliminated. A 24' wide townhome with a 2-car garage (18-20' wide) and driveway (2-car width) would be more than 80% of front yard. They say there is an exemption but, again, why list a requirement and then later say that's ok, certain driveways' are exempt as long as they are 25' or less in length - so do not have a 26' long driveway. (UHN-C)
#2287	7.06.11 Residential Parking Limitations
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	This section is currently in the Zoning Ordinance. Also, the proposed language would only apply to SFD units, not townhouse units.
#2237	7.06.11 Residential Parking Limitations
By: John Merrithew Tags: zoc Date:7/17/2021	This may be a moot question in the suburbs but is there any benefit to allowing parking on properly stabilized gravel or impervious surfaces? If so, I suggest we remove the requirement for paved surfaces and allow impervious surfaces wherever they would be feasible.
#2289	7.06.11 Residential Parking Limitations
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Thanks for the comment. The idea was to limit parking in areas where this has been a problem and not increase parking.
#2432	7.06.11 Residential Parking Limitations
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:7/20/2021	Also, please find in Section 5.05.12.A.5 that the term "paved parking surface" includes impervious surfaces and some pervious surfaces as well.
#2126	7.06.11 Residential Parking Limitations
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/10/2021	This section needs some graphics to illustrate, for instance but not only A.2.b.1.
#2290	7.06.11 Residential Parking Limitations
By: Rory Toth Tags: staff rory.toth@loudoun.gov	Thank you for the comment regarding graphics. Will consider graphics to assist in the administration of these regulations.

ID	Section
Date:7/19/2021	
#1860	7.06.11 Residential Parking Limitations
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	These are new standards. Is there a need? The limits on pavement in a side yard are prohibitive if garages are located in the rear of a narrow residential lot - rear loading garage or detached garage. The driveway in such cases traverses the side yard. How is the side yard (rear yard) measured? Just the required yards (setbacks)? Or from front to rear? Irregular (non-rectangular) lots? For the most part, enforcement entails intervention in neighbor disputes. Have fun!
#1997	7.06.11 Residential Parking Limitations
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	These are the existing standards that have been tailored to the new context driven approach. We understand that this section will need work because of potential enforcement concerns. More input to come.
#13816	7.06.10 Parking Location and Design
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.05.10.C. & E. Provide an incentive for the addition of solar canopies over off-street and on structured parking facilities and built-in EV charging capability.
#2454	7.06.10 Parking Location and Design
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/20/2021	5.05.11(E) PARKING STRUCTURE DESIGN REQUIREMENTS: The General Plan wants us to encourage Quality Design. This is a difficult thing to accomplish in practice. I think we need a discussion in ZOC first, then a consensus on how to achieve it. Dressing up parking garages might be a good idea, but let's approach it as part of an overall program, not do it piecemeal as it's written here.
#2223	7.06.10 Parking Location and Design
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/15/2021	5.05.11.E b and c. Two prescriptive and also too limited - decks are complicated aesthetic problems. Simply calling for one level to be glazed is de minimis.
#2447	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Will continue to refine text to allow for flexibility in design options.

ID	Section
#2448	7.06.10 Parking Location and Design
By: Rhys Wilson Tags: zoc rwilson@planningandlaw.com Date:7/20/2021	Got it.
#2262	7.06.10 Parking Location and Design
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	We have parking garages that are on the street and have openings, not windows. Will this not be allowed going forward?
#2415	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	We can further refine the text to allow flexibility in the types of design features to minimize the visual impacts.
#2249	7.06.10 Parking Location and Design
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.11(E) PARKING STRUCTURE DESIGN REQUIREMENTS 1.b. and 1.c. For above-grade parking structures it is clearly desirable to avoid "long expanses of blank walls." However, "windows" is not the only possible architectural design solution to address this problem. Further, "windows" over 50% of ground floor wall area (after exclusions) is a very expensive solution. The current County process, where developers proffer elevations during the rezoning process, has been working well. These two sections should be removed as being far too specific and generally too costly. (UHN-C)
#2440	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	We can further refine the text to allow flexibility in the types of design features to minimize the visual impacts.
#2248	7.06.10 Parking Location and Design
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.11(E) PARKING STRUCTURE DESIGN REQUIREMENTS 1.b. and 1.c. For above-grade parking structures it is clearly desirable to avoid "long expanses of blank walls." However, "windows" is not the only possible architectural design solution to address this problem. Further, "windows" over 50% of ground floor wall area (after exclusions) is a very expensive solution. The current County process, where developers proffer elevations during the rezoning process, has been working well. These two sections should be removed as being far too specific and generally too costly. (UHN-C)

ID	Section
#2442	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	We can further refine the text to allow flexibility in the types of design features to minimize the visual impacts.
#2247	7.06.10 Parking Location and Design
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	"5.05.11(D) COMPACT/WALKABLE/URBAN (CWU). It is highly desirable to have pedestrian-friendly environments. However, design criteria cannot be so restrictive as to ignore site topography, existing or future roadways, or stormwater management. It is simply unreasonable to assume that every site will have ""alleys"" or ""side streets"" to provide special entrances to parking. Especially in the case of affordable housing properties, these design criteria cannot increase site costs so much as to make the project economically infeasible. For this reason, affordable housing properties should be considered for exemption from sections: 5.05.11 (D) 1.b.; 5.05.11(D) 1.c.; 5.05.11(D)2.; 5.05.11(D)3.; and 5.05.11(D)4." (UHN-C)
#2443	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Understood. We will continue to refine text to allow flexibility yet address concerns with project costs.
#2240	7.06.10 Parking Location and Design
By: John Merrithew Tags: zoc Date:7/17/2021	Is there a way to reduce the environmental impact of parking areas by requiring additional landscaping, LID or impervious surface? If a use wished to construct more than the minimum parking, the additional parking should be designed to a higher standard to reduce the heat island, minimize the land required, and reduce runoff.
#2444	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	We can consider this as a potential incentive in the draft text.
#2239	7.06.10 Parking Location and Design
By: John Merrithew Tags: zoc Date:7/17/2021	Are the FSM parking and loaner design standards current and best practices?

ID	Section
#2446	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Please explain what is meant by the FSM parking and loaner design standards?
#2222	7.06.10 Parking Location and Design
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/15/2021	I like 5.05.11E.a., but how in the world can it be enforced? This also gets to Quality Design per the GP, and how it would be implemented.
#2449	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	The idea is that this type of information would be provided with the site plan for review by staff.
#2221	7.06.10 Parking Location and Design
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/15/2021	5.05.11 D. I'm dumb. Is a CWU a use? A district? Where is it in our documents?
#2445	7.06.10 Parking Location and Design
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/20/2021	CWU is a development pattern. The Comp Plan discusses compact development patterns and how to implement that kind of development style.
#2450	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	It is not a use. As drafted, the text states the following: Compact/Walkable/Urban (CWU) development contexts include, but are not limited to the Urban Mixed Use, Urban Transit Center, and Suburban Mixed Use Districts.
#2127	7.06.10 Parking Location and Design
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/10/2021	Should 'E' be clarified to indicate that the referenced Parking Structures Design Requirements are those in CWU's? These requirements would not seem appropriate to garages in suburban settings where the garage itself may not even be fronting on a street.

ID	Section
#2416	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Perhaps we can add language similar to what is stated in 5.05.11.D, which says Compact/Walkable/Urban (CWU) development contexts include, but are not limited to the Urban Mixed Use, Urban Transit Center, and Suburban Mixed Use Districts.
#2049	7.06.10 Parking Location and Design
By: John Merrithew Tags: zoc Date:7/6/2021	All businesses that invite customers to play, shop or eat should have a designated drop off and pick up area. The growth in ride sharing and autonomous vehicles will make drop off areas more important. Perhaps we should consider less parking and more drop off.
#2076	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Noted. Staff looks forward to additional discussion.
#2044	7.06.10 Parking Location and Design
By: John Merrithew Tags: zoc Date:7/6/2021	Parking structure design seems like overkill. If anything we should be promoting crime prevention through design techniques such as open visibility into the garage at ground level, security lighting, visible stairwells, etc.
#2077	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Noted. Staff welcomes the discussion as such points are important.
#2039	7.06.10 Parking Location and Design
By: John Merrithew Tags: zoc Date:7/6/2021	Prohibiting surface parking lots within 1/4 mile of a transit station seems contrary to the concept discussed with the General Plan that urban centers “build from the outside in” and that interim uses such as parking lots are desirable and easily replaced when the land becomes more valuable. Urban centers are likely to build in phases and it may be desirable to allow surface parking.
#2078	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Perhaps they can be permitted on an interim basis. We welcome additional discussion on surface parking near our transit stations.

ID	Section
#2020	7.06.10 Parking Location and Design
By: John Merrithew Tags: zoc Date:7/6/2021	<p>There seems to be a lot of unnecessary and redundant language in the Location and Design Section. Sections A&C are repeated in D, for example. Conformance to the FSM does not need to be stated.</p> <p>B seems to go the long way to stay any off site parking must come with a lease or deed. Lease or deed seems more arduous than a parking agreement. Do we need a deed?</p>
#2079	7.06.10 Parking Location and Design
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Noted. Staff will review and revise accordingly.
#1859	7.06.10 Parking Location and Design
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	<p>Landscaping standards There is an entire section of the zoning ordinance dedicated to landscaping and landscaping standards for parking lots. It is problematic to have such standards in this section of the ordinance as well (and the subjective nature is troubling).</p>
#1994	7.06.10 Parking Location and Design
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	We agree to this should be removed. This was included by mistake.
#1858	7.06.10 Parking Location and Design
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	<p>Ban on off-street parking in front and rear yards. These facilities often compliment parking structures by providing easy-in&out capability for select parties - handicapped, drop-offs, short term, etc.</p> <p>For the most part, all of these types of projects require rezonings in which these types of issues can be discussed rather than establishing standards that will require many waivers.</p>
#1992	7.06.10 Parking Location and Design
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	<p>Note: these standards apply to dense, compact development that have an urban feeling. While off-street parking is not allowed in the front or side yards, it is allowed in the rear. Urban development tends to use on-street parking, parking garages, and rear yard surface parking to promote walkability and attention to</p>

ID	Section
	site design. Drop off lanes and the like are site design standards which would be found in the development standards section or FSM.
#1857	7.06.10 Parking Location and Design
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Parking Structures The requirements for structured parking will likely deter early and temporary development in the Urban Transit Districts. It will make it difficult to scale-up development.
#1993	7.06.10 Parking Location and Design
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	We welcome the discussion and direction. Should the requirement be eliminated? Why would it be difficult to scale up development?
#1856	7.06.10 Parking Location and Design
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Do we need this section? Some of the criteria appear very subjective and unenforceable ("have as low visibility as feasible)
#1995	7.06.10 Parking Location and Design
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	We're open for discussion and consideration.
#2498	7.06.09 Loading
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/27/2021	As discussed 7/21/21, please distinguish among similar uses to create 2-3 Loading per SF tables. Additionally; - Maintain 0 loading sp. requirement for up to 10k SF - No loading required for utilities(substations, etc... do not need loading paces)
#2453	7.06.09 Loading
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/20/2021	Loading - another useless section. Just leave it up to market forces. This is just like trying to set general parking limits - the developer has to provide the right number of loading spaces depending upon tenant mix and characteristics, the size of the building, the geographical area, etc. Providing too few - project won't lease. Provide too many - wastes money.

ID	Section
#13352	7.06.08 Parking Adjustments
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	5.05.08.I.1. Affordable Housing Reductions-Requirements. Consider an additional incentive that allows the reductions per the stated ratios if the developer is providing more than the basic requirement for affordable housing.
#3457	7.06.08 Parking Adjustments
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:8/25/2021	The parking requirements in urban area do not align with goals of comp plan. The density of parking required will not allow the development density goals of comp plan. The transit reduction is great concept but percentages need to be doubled or tripled. Fairfax is great example of successful parking ratio in areas around transit and there no reason Loudoun shouldn't match that in the areas 1/4 to 1/2 mile from metro. Fairfax requires 1.5 sp for 2 BR MF units and 1.6 spaces for 3 BR or more in the Transit Areas.
#2246	7.06.08 Parking Adjustments
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	<p>"5.05.09(I) AFFORDABLE HOUSING REDUCTIONS. There is very little available research that ties car ownership (and thus parking spaces) to levels of Area Median Income (AMI). This is not a reliable metric for tracking family size, number of drivers in the household, or car ownership. This approach is not recommended for calculating parking reductions. A better, and much simpler, approach is to set an average number of parking spaces per Dwelling Unit for the whole affordable building based on more relevant factors: actual measured parking usage in the area; walkability of the site; distance to MetroRail; and provision of a Transportation Demand Management Plan (TDM). The Institute of Traffic Engineers (ITE) Parking Generation Guidelines, based on 29 studies, specify 0.99 Parking Space per Dwelling Unit for Affordable Housing. A recent parking study of multi-family affordable housing properties, prepared by traffic engineers at Gorove Slade (available for review) provides parking ratios for eight (8) Northern Virginia affordable housing properties with parking ratios ranging, on average, from 0.71 parking spaces/DU to a high of 1.43 spaces/DU. This report also provides a useful chart comparing site Walk Score to Parking Ratio (spaces/Unit). These eight properties have a wide variety of unit types (1-BR, 2-BR, 3-BR) illustrating the difficulty of using this approach alone to set parking needs. The foillowing proposal is offered for discussion. Multi-family Affordable Housing properties should start at a base parking ratio of 1.5 parking spaces per Dwelling Unit (1.5/DU). (Note; this parking ratio was recently approved by the Loudoun Board of Supervisors for a MF Affordable project.) Based on Walk Score: for every score above 50, decrease the parking ratio by 0.1 spaces/DU. For every Walk Score above 75, decrease the parking ratio by 0.2 spaces/DU. Based on Distance to MetroRail: less than 1 mile, decrease parking ratio by 0.1 spaces/DU. For less than 1/2 mile, decrease by 0.2 spaces/DU. For less than 1/4 mile, decrease by 0.3 spaces/DU. Based on having a Transportation Demand Management Plan (TDM): reduce the parking ratio 0.1 spaces/DU if a TDM is provided. When combining all of the above strategies, the resulting parking ratio may not be less than 1.0 Parking spaces/DU. Further discussion, and research, are needed to determine what parking ratio reductions are reasonable in affordable housing properties other than multi-family configurations. This</p>

ID	Section
	proposal would be unique to Section 5.05.09 (H) and would be excluded from added reductions allowed under sections 5.05.09 (I),(J),(K), and (L)." (UHN-C)
#2410	7.06.08 Parking Adjustments
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Good points. Will consider these comments to further refine parking adjustments for affordable housing.
#2461	7.06.08 Parking Adjustments
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/21/2021	As indicated in the 7/18 comment and at the 7/21/21 ZOC meeting, the link below provides additional data regarding methods to calculate parking for developments with ADUs from industry experts for Staff's review and consideration: https://goroveslade-y.sharepoint.com/:f/p/alj/EvYOMWN4aAJGIpGItp82s4B0lsvl6XBh0D5ykiGxt9w2Q?e=LUt8L3
#2452	7.06.08 Parking Adjustments
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/20/2021	Re permitting reduction in required parking if put underground -- This is an incentive that would never be used. We developed underground parking only when absolutely necessary, as on tight urban sites. Underground parking costs a multiple of decked parking. While I'd eliminate this provision, you might as well leave it since it will never come into play.
#2261	7.06.08 Parking Adjustments
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	Structured parking reductions--Is the difference between above and below ground parking structure reductions to encourage below ground parking? If a structure has both then it would get the 10% reduction?
#2409	7.06.08 Parking Adjustments
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	The purpose of this reduction is to offer an incentive when developing above ground or below ground parking garages to reduce the number of required spaces, which also reduces the cost to construct. Regarding the percentages of reduction, the thought is that if a parking structure has both above and below ground parking, the applicant would be able to utilize both the 5% and 10% reductions
#2260	7.06.08 Parking Adjustments
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	F. Structured parking reductions--Is the difference between above and below ground parking structure reductions to encourage below ground parking? If a structure has both then it would get the 10% reduction?

ID	Section
#2408	7.06.08 Parking Adjustments
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	The purpose of this reduction is to offer an incentive when developing above ground or below ground parking garages to reduce the number of required spaces, which also reduces the cost to construct. Regarding the percentages of reduction, the thought is that if a parking structure has both above and below ground parking, the applicant would be able to utilize both the 5% and 10% reductions.
#2245	7.06.08 Parking Adjustments
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.09(I) AFFORDABLE HOUSING REDUCTIONS. Experts are bothered by the proposal saying that people making less than AMI have less cars without any relationship to proximity to public transport (just income level) as set forth below (is this discriminatory?). Any parking reductions should be directly related to proximity to public transport - not income. (UHN-C)
#2411	7.06.08 Parking Adjustments
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Good points. Will consider these comments to further refine parking adjustments for affordable housing.
#2244	7.06.08 Parking Adjustments
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.09(H) PROXIMITY REDUCTIONS [AFFORDABLE HOUSING] This section is confusing. Why would a non-residential development receive a parking reduction for being near affordable housing? Why must a development satisfy all three conditions to receive a parking reduction? It seems unlikely that many developments would be able to satisfy all three. (UHN-C)
#2412	7.06.08 Parking Adjustments
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	<p>Good points. We will continue to refine text to allow flexibility in the event a development would not meet all three criteria.</p> <p>The thought behind the reduction for affordable housing is by having less dependence on vehicles by both uses, each of them mutually benefit because they are using other modes of transportation.</p>
#2238	7.06.08 Parking Adjustments
By: John Merrithew Tags: zoc Date:7/17/2021	I agree with earlier statements about simplifying the parking adjustment process. As more and more development is occurring as single lot/single user projects, the cost of engineers and process time will severely impact these projects. Why can't two owners sign a zoning permit or site plan indicating the different uses, the individual parking demands vs available spaces, and agreeing to share the

ID	Section
	parking? We need to think more about individual lot/individual use projects and not the large scale mixed use of the past.
#2413	7.06.08 Parking Adjustments
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	The draft text 5.05.09.B.1 and 2 allow the sharing of parking for two or more lots (just like the existing text allows for today). However, parking information is necessary to determine if the shared parking exists and/or will remain available. That is where a parking study, as agreed upon by a signed scoping document, would specify the amount of information and analysis needed, so the Zoning Administrator could then review the parking study.
#2220	7.06.08 Parking Adjustments
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/15/2021	5.05.09 Parking Adjustments. I still have many fundamental problems with a lot of the idealistic standards (e.g., bike, EVs, car-shares, etc.) One way I could be satisfied would be to give the ZA the right to grant a "parking variance" relative to any ratio or standard.
#2414	7.06.08 Parking Adjustments
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Staff's goal is to implement the policies of the 2019 General Plan and 2019 CTP. Almost all of the parking adjustments in this section, except for 5.05.09.M, are to be done administratively via a request to the Zoning Administrator.
#1946	7.06.08 Parking Adjustments
By: John Merrithew Tags: zoc Date:7/6/2021	Don't understand the reduction for affordable housing or public open space. Is car pooling the same as car sharing? Does transit include bus lines? What's the basis for a maximum reduction of 35%? There is no real need for a scoping meeting if you require a professional do the study. The standards a for the study should be consistent.
#1896	7.06.08 Parking Adjustments
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.09(F) STRUCTURED PARKING REDUCTIONS. Is there a short reason for a 10% reduction for below-grade vs. 5% reduction for above-grade parking structures?
#1988	7.06.08 Parking Adjustments
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Below grade parking garages tend to cost more money to construct than above grade garages. Offering a developer more of an incentive to provide a below grade garage by allowing a 10% parking reduction instead of a 5% reduction for an above grade garage.

ID	Section
#1895	7.06.08 Parking Adjustments
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.09(D)(1) PARKING ADJUSTMENTS. How are driveway and/or garage parking spots in public or private right-of-way abutting the lot factor in the ratio calculation? Parking in HOA areas has been a problem due to how spots were included in ratios.
#1990	7.06.08 Parking Adjustments
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Is this question in reference to residential parking? If so, see section 5.05.14 for further clarity and open discussion.
#1855	7.06.08 Parking Adjustments
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	The TDM approach is appropriate for large, complex urban projects.
#1989	7.06.08 Parking Adjustments
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	We agree, thank you for the feedback.
#1854	7.06.08 Parking Adjustments
By: Eric Zicht Tags: zoc zicht Date:7/3/2021	It should not be necessary to retain professionals to apply for a simple parking adjustment. Say a homeowner who collects cars, or a B&B with fewer than 10 parking spaces.
#1991	7.06.08 Parking Adjustments
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Once deliberated and the appropriate ratios are found, most minimums and maximums should alleviate the need for adjustments. However, looking at the appropriate levels of justification for this section and discussing is welcome.
#11039	7.06.07 Oversized Vehicle Parking
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com	"5.05.12 VILLAGE PARKING. The Loudoun Historic Village Alliance (LHVA) would like to remind the county that the villages have survived just fine since the invention of the automobile. Bluemont Fair parks 600 -1000 cars daily, Philomont's VFD Pit BBQ parked 100 - 200 cars, Waterford Fair 3,000 cars daily,

ID	Section
Date:7/9/2022	Lucketts events and Aldie Fair. The villages do not want any parking regulations. No parking minimums for non residential use in villages or off-street parking. Parking regulations would ruin our rural historic villages. For decades, businesses have come up with work arounds by working with their neighbors. We do not want staff to confuse towns with villages. WE OFFER VILLAGE TOURS IF NEEDED BY ANYONE. LHVA. Staff Response: Thank you for the comments. We will continue to refine the text to make parking regulations that fit the villages" STATUS?
#3597	7.06.07 Oversized Vehicle Parking
By: john merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/1/2021	Can the owner of the RV park it behind his house for the winter? He should be able to. To repeat an earlier comment, guests should be allowed to park in my driveway for the weekend.
#9636	7.06.07 Oversized Vehicle Parking
By: Judi Birkitt Tags: staff judi.birkitt@loudoun.gov Date:4/11/2022	Agreed and edited.
#2259	7.06.07 Oversized Vehicle Parking
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	There is no mention of Tiny House type vehicles on wheels. Are they being considered the same as an RV, and if so, should they be?
#2405	7.06.07 Oversized Vehicle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	A "tiny house" is not considered the same as an RV. They require a building permit and zoning permit.
#2243	7.06.07 Oversized Vehicle Parking
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	"5.05.08(E)--5.05.08-1 TABLE 5.05.08-1 OVERSIZED VEHICLE PARKING MATRIX. It is expensive to build parking spaces. It is a significant waste of money to build parking spaces that will never be used. Paragraph D.4. specifies that Major Recreational Equipment may not park in a residential area for more than 24 hours. A parking space for Major Recreational Equipment will consume land equivalent to at least two (2), if not three (3) or four (4) regular parking spaces. Per the table, this will be double on a 2+ acre lot in the SPA. This requirement should be eliminated in the SPA. All three cells under ""Recreational"" and ""SPA"" should be zero ""0""." (UHN-Committee)

ID	Section
#2406	7.06.07 Oversized Vehicle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Good points to consider. We will reexamine this section and continue to refine text.
#2129	7.06.07 Oversized Vehicle Parking
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/11/2021	I am not entirely vehicle conversant, but the definitions seem to miss a broad category of vehicles--like 2-ton pick-ups and greater, i.e. less than 12,000 lbs and less than 8' tall...
#2407	7.06.07 Oversized Vehicle Parking
By: Rory Toth Tags: rory.toth@loudoun.gov Date:7/20/2021	Good points. We will try to clarify.
#1945	7.06.07 Oversized Vehicle Parking
By: john Merrithew Tags: zoc Date:7/6/2021	How does this apply to farmers in the rural area? Are we requiring they pave the parking area? Does this limit the number of tractors and hay wagons? Maybe Business and Commercial vehicle standards should not apply in the RPA?
#1987	7.06.07 Oversized Vehicle Parking
By: Rhys Wilson Tags: rwilson@planningandlaw.com Date:7/6/2021	See comment above. These rates shouldn't affect a farm. Farms are not located in residential districts unless we've updated the use table again. Maybe business and commercial vehicle standards shouldn't apply to the RPA to further clarify and ensure ag uses are protected.
#1894	7.06.07 Oversized Vehicle Parking
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.08(D) OVERSIZED VEHICLE PARKING REQUIREMENTS. What are the enforcement methods for #1 (oversized vehicle parking prohibited in residential districts). What are the enforcement procedures for #4 when major recreation equipment is parked on residential premises for over 24 hours?
#1985	7.06.07 Oversized Vehicle Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com	We will get feedback from enforcement staff and provide answers later regarding Loudoun's enforcement.

ID	Section
Date:7/6/2021	
#1853	7.06.07 Oversized Vehicle Parking
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	All the other regulations focus on the number of parking spaces. Here we suddenly are based on acreage. Why? How is this area measured? Does it include landscaped islands, entrances, pedestrian crossings, loading areas, fire aisles, etc? Too complex to administer
#1986	7.06.07 Oversized Vehicle Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	This measurement is based on the number of parking spaces in relation to lot acreage. The thinking is to better accommodate oversized vehicle parking for large tracts of land in a given policy area while limiting oversized vehicle parking for smaller lots in a given policy area. Note that this section only applies to Residential Districts within the Policy Areas. These regulations shouldn't be complicated to administer at all given that it only applies to Residential Districts. Also, lot acreage is a pretty standard measurement - it is the measurement of the lot's width and depth.
#2130	7.06.06 Car-Share Parking
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/11/2021	I agree with Charlie--leave this section out
#2350	7.06.06 Car-Share Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	This section was added to assist in implementing TDM policies called for in the CTP. Will be happy to discuss further with ZOC.
#2086	7.06.06 Car-Share Parking
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/7/2021	section 5.05.07 Suggest omitting car-share parking and adding it if and when it's a reality. Heck, a shared car just takes the same parking space as an un-shared car. This is basically planning-to-start-a-social-experiment. Leave it out.
#2458	7.06.06 Car-Share Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/20/2021	Comment noted. This section was drafted to help implement TDM policies called for in the 2019 CTP and implement transportation options, which is also called for by the 2019 CTP.

ID	Section
#1944	7.06.06 Car-Share Parking
By: John Merrithew Tags: zoc Date:7/6/2021	If a business normally requires 100 spaces, should we not be reducing the number of spaces based on them offering a car sharing program? Seems like we are asking for additional parking spaces for a program intended to reduce vehicles in the parking lot.
#1984	7.06.06 Car-Share Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	These requirements are not additions. If there's a development that requires 100 total parking spaces, 1 spaces must be dedicated as a car-share parking space. In C, if we're using the same example, 1 car share space within 100 ft of an entrance is equal to 3 spaces. That means if the site provides 97 car spaces and 1 car share space within 100 ft of an entrance, then that meets the 100 space requirement.
#1852	7.06.06 Car-Share Parking
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	What portion of actual parking demand are car-shares today? What is the demand (& availability) for such in western Loudoun? Overkill?
#1981	7.06.06 Car-Share Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	This is certainly open for discussion. In line with both the 2019 GP and the CTP, it is an anticipated future demand.
#2132	7.06.05 Motorcycle/Scooter Parking
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/11/2021	Motorcycles can park in car spaces. There is no compelling reason for this section to exist. Leave it out.
#2348	7.06.05 Motorcycle/Scooter Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	As multiple motorcycles could be parked in a motorcycle space and not take up a space for a car, the idea was to make this an option, especially in areas where parking is a premium. Happy to discuss further with the ZOC.
#2131	7.06.05 Motorcycle/Scooter Parking

ID	Section
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/11/2021	As I mentioned in our July 7 meeting, motorcycles, etc. can park in car spaces. It's not like the number of smaller, motorcycle spaces will make much difference in paved area and it only complicates things. Leave this section out.
#2349	7.06.05 Motorcycle/Scooter Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Would be happy to discuss further with ZOC.
#1943	7.06.05 Motorcycle/Scooter Parking
By: John Merrithew Tags: zoc Date:7/6/2021	What is the problem we are solving?
#1976	7.06.05 Motorcycle/Scooter Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Staff indicated the need for ways to address motorcycle/scooter parking. This section provides dedicated parking space for motorcycle/scooter parking.
#1922	7.06.05 Motorcycle/Scooter Parking
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:7/5/2021	What is the purpose of having a separate standard? Will the spaces be smaller? Will they be designated in a separate section for safety - to separate cycles from cars?
#1977	7.06.05 Motorcycle/Scooter Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	These questions will be tackled in the FSM. Usually motorcycle space dimensions are smaller than traditional car parking spaces.
#1851	7.06.05 Motorcycle/Scooter Parking
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Compliments on simplicity BUT are 2% of vehicles actually motorcycles? Are these spaces in lieu of or in addition to the required parking for autos?
#1980	7.06.05 Motorcycle/Scooter Parking

ID	Section
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	First question: a quick search shows that 3 to 4% of registered vehicles in America are motorcycles. Second question: no they aren't additions to the parking required for cars. Take an example that requires 50 total parking spaces. 2% of those 50 spaces is 1. So 1 space out of the 50 total spaces is specifically dedicated to motorcycles/scooters.
#14122	7.06.04 Electric Vehicle Parking
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.05.04 In appropriately dense areas, require/encourage installation of streetlight poles and fixtures that also provide electric vehicle charging capabilities and, in the FSM, spell out more detailed standard.
#13842	7.06.04 Electric Vehicle Parking
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.05.05.-1 Consider flexible parking percentages that can be reevaluated as the market adjusts, while expanding EV parking requirements and charging stations at a wider variety of uses including Government, Parking facilities and transit facilities.
#13838	7.06.04 Electric Vehicle Parking
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.05.05.C Ensure that regular handicapped parking facilities are not replaced with EV charging stations, and ensure that accessible EV charging facilities are also available.
#10025	7.06.04 Electric Vehicle Parking
By: William Junda Tags: zoc bjunda@gordon.us.com Date:5/26/2022	The EV parking for multi-family isn't differentiated between the different types of MF product. 8% EV spaces for MF stacked wouldn't be appropriate. 8% EV for traditional MF is also extremely high and would be cost prohibitive especially in the suburban policy area districts.
#9744	7.06.04 Electric Vehicle Parking
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/22/2022	shouldn't government facilities be required to provide electric vehicle charging spaces?
#3405	7.06.04 Electric Vehicle Parking

ID	Section
By: John Merrithew Tags: zoc Jm@lo.gov Date:8/25/2021	Why would an amphitheater require 2% ev parking and dinner theater and most other uses in this use category only require 1%. These numbers seem arbitrary so I'd like to know the logic behind the ratios and I would suggest starting out that we require a fixed percentage anywhere we want ev parking.
#2451	7.06.04 Electric Vehicle Parking
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/20/2021	I agree with Matt on removing some language. In many instances the draft standards are a confusing and unnecessary overreach. Bike and EV parking are examples.
#2271	7.06.04 Electric Vehicle Parking
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/19/2021	Suggest removing both EV and bicycle detailed requirements from the Zoning Ordinance and instead providing more general language to allow or promote the infrastructure. Each use and demand varies for the type of the infrastructure and has an impact on maintenance, assigning of units (multi-family situation), etc.
#2343	7.06.04 Electric Vehicle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Will consider these comments on EV and bicycle parking, however, having parking requirements too general could create inconsistency in administration and not implement 2019 Plan policies. Perhaps some of these requirements may better be located in the FSM.
#2258	7.06.04 Electric Vehicle Parking
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	Shouldn't there be EV parking at parking facilities and transit facilities?
#2344	7.06.04 Electric Vehicle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Agreed.
#2257	7.06.04 Electric Vehicle Parking
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	Manufacturing and Employment: Why would there be no need for EV parking at facilities in this category that have employees, i.e. data centers, media production, research and development and even flex buildings?

ID	Section
#2345	7.06.04 Electric Vehicle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Will consider adding EV to uses under this category.
#2134	7.06.04 Electric Vehicle Parking
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/11/2021	F. requires Accessible Facilities to be within 75' of the building entrance, but I do not see any requirement elsewhere for providing such charging stations.
#2346	7.06.04 Electric Vehicle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	The text also includes the words "or facility entrance". Would like to discuss further to ensure the clarification you suggest is understood.
#2133	7.06.04 Electric Vehicle Parking
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/11/2021	Good idea to begin to provide charging stations, but I think you need to establish minimum numbers. For instance, how many convenience stores have 100-car parking lots, or even 50-car lots, yet 1% is the number of charging stations? Reexamine the percentages in the light of real world parking lot sizes and set minimums of 1 or 2 and then base any additional on percentages.
#2347	7.06.04 Electric Vehicle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Will consider changes to Section 5.05.05 B. 1 and 2.
#1942	7.06.04 Electric Vehicle Parking
By: John Merrithew Tags: zoc Date:7/6/2021	What does the ratio apply to? Convenience store with gas pumps is 1%; of what? Should we be asking for charging stations equivalent to 20% of the number of conventional pumps?
#1974	7.06.04 Electric Vehicle Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	See section 5.05.05.B - "minimum percentages of electric vehicle parking are calculated based on the minimum number of required parking spaces for a use". So in your example, 1% of the total parking should be reserved for EV. Also note that EV parking only applies to developments more than 10,000 sf. EV rates

ID	Section
	probably won't apply to most convenience store gas stations. The question of "should we be" is certainly open for discussion.
#1941	7.06.04 Electric Vehicle Parking
By: John Merrithew Tags: zoc Date:7/6/2021	What are the ratios for hotels, multi family dwellings, office, etc. based on?
#1973	7.06.04 Electric Vehicle Parking
By: Rhys Wilson Tags: rwilson@planningandlaw.com Date:7/6/2021	Based on best practices and our experience. These ratios are open to discussion.
#13826	7.06.03 Bicycle Parking
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Table 5.05.04-1 The amount of bicycle space for MF in the UPA and SPA is too low/unit for long-term; missing s/t for government (General), parking facilities, transit facilities.
#9743	7.06.03 Bicycle Parking
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/22/2022	are there provisions for bike parking requirements to be reduced/shared in a mixed use setting?
#2256	7.06.03 Bicycle Parking
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	Wouldn't there be a need for bicycle parking at suburban parking facilities and transit facilities, as well as urban parking and transit facilities?
#2338	7.06.03 Bicycle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Good point to consider. Will consider bicycle parking options for uses across Suburban policy areas as well.
#2228	7.06.03 Bicycle Parking

ID	Section
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/17/2021	Need to increase the minimum required bicycle parking for multifamily. Many households may have one or more bicycles.
#2339	7.06.03 Bicycle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Will consider increasing minimums for bicycle parking for MF units.
#1940	7.06.03 Bicycle Parking
By: John Merrithew Tags: zoc Date:7/6/2021	I want to withdraw my comment about putting a cap on bike racks. I realize now it was short term versus long term facilities and not minimum and maximum.
#2073	7.06.03 Bicycle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Understood.
#1939	7.06.03 Bicycle Parking
By: John Merrithew Tags: zoc Date:7/6/2021	Shouldn't we require bike racks at transit stations and stops? Seems people who are close by the station might not want to take their bikes on metro all the way to DC.
#1970	7.06.03 Bicycle Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Thank you for bringing up this point. We will look at revising in future drafts.
#1938	7.06.03 Bicycle Parking
By: John Merrithew Tags: zoc Date:7/6/2021	Why would we ever put a cap on the number of bike spaces or bike racks a business wants to put on their property? What is the issue we are trying to address with these standards, Do we really care about the type of bike rack? Given the number uses with non required, It would seem we could limit this section to just those uses we think need bike racks.
#2074	7.06.03 Bicycle Parking

ID	Section
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Good point. We welcome additional discussion on bicycle parking.
#1893	7.06.03 Bicycle Parking
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.04 Bicycle Parking. Under review by LCPCC member organization experts.
#2075	7.06.03 Bicycle Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Noted.
#1850	7.06.03 Bicycle Parking
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Do we need parking standards for bicycles, motorcycles, car-share and oversized vehicles in other than dense urban nodes? We don't have such now. Are there significant problems? Seems to add a lot of complexity to little public benefit.
#1972	7.06.03 Bicycle Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Standards will be mostly addressed in the FSM, however, bikes and oversized vehicles standards in urban nodes would make sense given that space is at a premium and development is supposed to be dense. Staff input and ZOC discussion are welcome..
#1849	7.06.03 Bicycle Parking
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Can' bicycle, electric vehicle, motorcycle and oversize vehicle parking be addressed in the same table as cars?
#1971	7.06.03 Bicycle Parking
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	We can consider an approach like you're suggesting. I'm not sure if all of that information will fit into the table.

ID	Section
#14108	7.06.02 Parking Ratios
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.05.02.C. Consider eliminating the minimum parking requirements in some nonresidential uses adjacent to Metro stations. As an example, the Fairfax County Zoning Ordinance does not require minimum parking rates at hotel and office uses within one-half mile of a metro station (see below). This may necessitate parking districts to avoid a clash between residents and visitors.
#11038	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.05.02-4. RPA Table. WINERY, COMMERCIAL. This use is listed twice -- under Food & Beverage Sales with a minimum of 2/1000 sf and again under Agriculture with minimum of ""2/winery"" (seriously?). Was any consideration given to parking requirements for tasting rooms, event venues, and current, actual, parking at EXISTING commercial wineries? With the actual volume of patrons, and known overflow parking to inappropriate rural areas ratios may need to be more in line with Restaurant. Staff Response: We welcome the discussion on parking ratios for commercial wineries. Principal uses associated with wineries would be parked separately. 2022 Round 3 Input: Parking requirements for high-intensity uses (e.g., commercial wineries, event centers, and breweries with events) should be calculated based on outdoor licensed area square feet. If only by indoor square feet, parking may likely be insufficient for licensed area / outdoor activities at breweries and wineries."
#11036	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.05.02-5. JLMA Table. AGRITAINMENT. For the ratio of 3/1000 sf is this only for the building or does it include the agritainment area? If the latter, then should be more in line with outdoor recreation of 8/1000 sf. that indicates by area vs. building. Staff Response: Good point. Acreage may be a more appropriate parameter to utilize. We welcome additional discussion on agritainment parking ratios."
#11035	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.05.02-4. RPA Table. BREWERY, LIMITED. How was a minimum of 2/1000 sf determined? Why are ratios LESS than Craft beverage manufacturing in JLMA of 4/1000 sf? Was any consideration given to parking requirements for tasting rooms, event venues, and current, actual, parking at EXISTING Limited Breweries, especially those that regularly hold events and large fundraisers? This will need to be evaluated again AFTER review of performance standards in Section 3.06. Staff Response: We welcome additional discussion on limited breweries versus craft beverage manufacturing. Individual parking studies were not conducted. 2022 Round 3 Input: Although the parking ratio was increased to 8/1000sqft, it still does not address parking requirements for high-intensity additional uses/events that should be calculated based on outdoor licensed area

ID	Section
	square feet. If only by indoor square feet, parking may likely be insufficient for licensed area / outdoor activities at breweries and wineries."
#11034	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.05.03-4. RPA TABLE. 2022 Round 3 Input: Parking requirements for high-intensity uses (e.g., event centers, large wineries and breweries and those with events) should be calculated based on outdoor licensed area square feet. If only by indoor square feet, parking may likely be insufficient for licensed area / outdoor activities at high-intensity event and beverage manufacturing uses. "
#11033	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.05.02-3. TPA Table, 5.05.03-4. RPA Table. 5.05.03-5 JLMA Table. WINERY, VIRGINIA FARM. How (in the world) was a minimum of ""2/winery"" determined? Versus Qty/1000sf? Was any consideration given to parking requirements for tasting rooms and current, actual, parking at EXISTING Farm Wineries? With the actual volume of patrons, and known overflow parking to inappropriate rural areas ratios may need to be more in line with Restaurant. Staff Response: Thanks for pointing that out. We will continue to look into Virginia Farm Winery parking ratios and welcome the discussion. Other principal uses associated with wineries would be parked separately 2022 Round 3 Input: Although the parking ratio was increased to 8/1000sqft, it still does not address parking requirements for high-intensity additional uses/events that should be calculated based on outdoor licensed area square feet. If only by indoor square feet, parking may likely be insufficient for licensed area / outdoor activities at high-intensity beverage manufacturing uses. "
#11032	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.05.02-2 SPA Table. 5.05.02-3 TPA Table., 5.05.02-4 RPA Table. COUNTRY INN. Does the ratio apply to ""cottages"" and if so, will the quantity of bedrooms w/in a ""cottage"" count as .75 in RPA (vs. the .25 in SPA & TPA)? Staff Response: Further follow-up discussion is necessary on this question." STATUS?
#11031	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	5.05.02 -- PARKING RATIO TABLES. Please consider separating the Parking Ratio tables by Policy Area so that separate links can be provided for direct access to each table (versus the scroll up/scroll down method).
#11030	7.06.02 Parking Ratios

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.05.02(E). NEW CONSTRUCTION OR EXPANSION. How will this requirement apply to NEW construction of an ""ag barn"" that then becomes a Rural Use? Are all zoning permit requests reviewed for adequate parking requirements for ""ag barns"" converted to tasting rooms, event centers, agritainment venues, etc.? Staff Response: The idea is that parking would be reviewed when a change of use occurs 2022 Round 3 Input: Although an appropriate ""idea,"" all applications for ""ag barns"" should be more stringently reviewed for actual end use due to the known activities of applying for/building an ""ag barn"" for conversion to a high-intensity use. "
#11029	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.05.03-4. RPA TABLE. 2022 Round 3 Input: Parking requirements for high-intensity uses (e.g., event centers, large wineries and breweries and those with events) should be calculated based on outdoor licensed area square feet. If only by indoor square feet, parking may likely be insufficient for licensed area / outdoor activities at high-intensity event and beverage manufacturing uses. "
#10220	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:6/15/2022	Please consider separating the Parking Ratio tables by Policy Area so that separate links can be provided for direct access to each table (versus the scroll up/scroll down method).
#9938	7.06.02 Parking Ratios
By: William Junda Tags: zoc bjunda@gordon.us.com Date:5/2/2022	shouldn't Table 5.05.03-1 be referenced as 5.05.02-1?
#6834	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	Suggest a maximum of 20 cars per Country Inn, as a way to control the size of these often-misused category.
#6274	7.06.02 Parking Ratios
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/27/2021	5.05.03-4 Table a. BnB regulations require 1 + .75 parking spaces per bedroom. Why is Guest Farm or ranch only 1 + .5? b. Camping requires 5/campground? Should this be 1/DU (campsite) plus parking for staff? c. Why does accessory dwelling have no parking standard when tenant dwelling is 1/DU as a minimum and 2.5/DU as maximum and BnB regulations are as in question (a)? This

ID	Section
	<p>should reflect that accessory dwellings will/could be used as STR. d. Under Arts, Recreation and Entertainment 1. How was .33 of permitted capacity plus 1/employee calculated for equestrian event facility? e. Under Agriculture 1. Limited Brewery is 2/1,000sf, commercial and farm wineries are 2/winery. Similar uses are 5/1000sf for banquet facilities, 8/1000 for amphitheater and 8/1000sf for outdoor recreation. REDC asks why wineries and limited breweries are not 8/1000sf of building with 2 spaces being ADA? For standards, REDC requests that parking must be on-site on land contiguous to and owned by the facility and be permitted in fields so as not to require impermeable or permanent gravel parking spaces. There should be parking minimum of 8/1000 sf of building. Satellite parking may be allowed for special events as long as transportation to the facility is provided. 2. How was 1 space/4 stalls determined for stable private or stable livery?</p>
#2499	7.06.02 Parking Ratios
<p>By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/27/2021</p>	<p>There should not be a minimum required parking space at all for Major/Minor Utilities (reservoirs, substations, pumping stations, etc....) If one must be established then it should be by SF as many of these uses propose no actual SF of structure.</p>
#2457	7.06.02 Parking Ratios
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/20/2021</p>	<p>5.05.03-2 Suburban. Medical. While I'm chary of any commercial parking ratios, a medical facility needs at least 4.5 spaces/1,000 sf. I believe 5/1,000 is more appropriate. (I formed and ran a subsidiary division that became the country's 4th-largest medical office building developer, so my comment is based on extensive real-world experience.)</p>
#9694	7.06.02 Parking Ratios
<p>By: Judi Birkitt Tags: staff judi.birkitt@loudoun.gov Date:4/15/2022</p>	<p>Increased to a minimum of 3/1,000 for discussion purposes as part of the first draft ZO.</p>
#2272	7.06.02 Parking Ratios
<p>By: Matt Lawrence Tags: zoc mLawrence@pennoni.com Date:7/19/2021</p>	<p>In the TR Districts, it appears only Dwellings and Lodgings are limited. Does not seem equitable.</p>
#2297	7.06.02 Parking Ratios
<p>By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021</p>	<p>Would like some additional clarification on this comment.</p>

ID	Section
#2255	7.06.02 Parking Ratios
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	Table 5.05.03-1 2nd page has the wrong headers --Residential & Household living instead of retail which is on the bottom of the first page.
#2299	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	We will ensure table headings are corrected.
#2254	7.06.02 Parking Ratios
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:7/19/2021	5.05.03-A8c Typo--P is missing in Parking.
#2298	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Corrected.
#2242	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	5.05.03-2 SPA Table. Need to be careful with maximums. For instance, in the SPA, a single family detached unit is listed with a maximum of 3 parking spaces. But if an SFD has a 3-car garage, then house has 3 parking spaces in the garage plus at least 2-3 spaces in driveway.
#2231	7.06.02 Parking Ratios
By: John Merrithew Tags: zoc Date:7/17/2021	Sidebar comment: Rural land use is "limited brewery" but other districts allow "craft beverage manufacturing". Is there a difference? Should the terms be consistent?
#2241	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/18/2021	The terms are not the same. BREWERY, LIMITED is enabled through the Code of Virginia, with the requirement, "the brewery is located on a farm in the Commonwealth on land zoned agricultural and owned or leased by such brewery or its owner and (ii) agricultural products, including barley, other grains, hops, or fruit, used by such brewery in the manufacture of its beer are grown on the

ID	Section
	farm." CRAFT BEVERAGE MANUFACTURING was created for businesses outside of the RPA that cannot/do not comply with those Code of VA requirements.
#2296	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	These uses are two different uses.
#2227	7.06.02 Parking Ratios
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/17/2021	In the RPA the Live/work dwelling parking should be at least the same as single family detached dwelling. Or some other number greater than currently listed, as a live/work dwelling may have owners, employees, and clients/visitors correct? Maybe eliminate the maximum.
#2302	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Thank you for the input and consideration for changing this parking ratio.
#9695	7.06.02 Parking Ratios
By: Judi Birkitt Tags: staff judi.birkitt@loudoun.gov Date:4/15/2022	Agreed. Eliminated the maximum.
#2219	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/15/2021	Max office parking in UPA: 2/1000 is too low since Loudoun's Metro patterns are not robust. (I.e., the lines simply go towards DC and do not provide lateral connections.) Thus more parking may be needed AS DETERMINED BY DEVELOPER.
#2330	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Will take revising office parking ratios under consideration.
#9693	7.06.02 Parking Ratios
By: Judi Birkitt	Removed max parking in UPA zoning districts in first draft ZO.

ID	Section
Tags: staff judi.birkitt@loudoun.gov Date:4/15/2022	
#2135	7.06.02 Parking Ratios
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/11/2021	There is no need for parking requirements, either minimum or maximum for Household living in the RPA.
#2331	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Will consider revising parking ratios for min and max in RPA under consideration.
#1935	7.06.02 Parking Ratios
By: John Merrithew Tags: zoc Date:7/6/2021	It looks like there is more parking required for a transition area and rural area restaurants than for suburban and urban areas.Is this intentional?
#2002	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	The thought behind this was to require less parking in areas where there is more opportunity for different modes of transportation while in the transition and rural areas there is more reliance on vehicles. Staff welcomes additional discussion with ZOC.
#1934	7.06.02 Parking Ratios
By: John Merrithew Tags: zoc Date:7/6/2021	Virginia farm wineries usually include a retail and entertainment function. Have we distinguished the uses? 2 parking spaces per winery seems very low.
#2004	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Staff welcomes additional discussion on Virginia farm wineries if it is the desire of ZOC that this ratio needs adjusted.
#1933	7.06.02 Parking Ratios

ID	Section
By: John Merrithew Tags: zoc Date:7/6/2021	Is ground transportation referring to the terminal? If not is the parking requirement an acreage rather than a floor area?
#2007	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Good point. Parking ratio should be considered to be based upon acreage. We will revise future drafts.
#1932	7.06.02 Parking Ratios
By: John Merrithew Tags: zoc Date:7/6/2021	The difference between minimum and maximum permitted parking spaces is typically 100% and often more than double the minimum. That seems excessive. Can we hear how that was arrived at?
#2013	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	The min/max approach to parking was created to allow flexibility in parking ratios based upon context area, yet also implement policies regarding sustainability and reduction in impervious areas called for in the 2019 General Plan and 2019 CTP. Staff is open to additional discussion on these ratios.
#1931	7.06.02 Parking Ratios
By: John Merrithew Tags: zoc Date:7/6/2021	Farm co-ops are a form of ownership; not a use.
#2014	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Farm co-op is listed as a use in the draft language of the use matrix and a parking ratio was created for such use.
#1929	7.06.02 Parking Ratios
By: John Merrithew Tags: zoc Date:7/6/2021	Art studio and food store require the same parking. I need to hear more about the logic behind the GFA measurement for parking versus the activity of the use. For example, all schools and colleges require the same parking when the parking demand is clearly different and the parking-generation space versus non-parking-generating space is different based on the type of school.
#2015	7.06.02 Parking Ratios

ID	Section
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Additional discussion will be provided by the consultant regarding these two uses.
#1928	7.06.02 Parking Ratios
By: John Merrithew Tags: zoc Date:7/6/2021	I'm confused by the Manufacturing and employment requirements. Data Centers typically require few spaces. Are these standards based on our history? I also see less parking required for flex space than for data centers, Flex space usually includes retail and recreational uses. Seems the reverse of what we have done in the past.
#2016	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome additional discussion on these parking ratios and uses. Parking ratios for these uses fall under industrial or manufacturing in the ITE Manual.
#1927	7.06.02 Parking Ratios
By: John Merrithew Tags: zoc Date:7/6/2021	One space per five acres for farm market seems to be an odd ratio. How many 5-acre farm markets do we see and is the acreage all market? Seems like we are including the farming operation in the calculation? If you look at the Farmer John operation, it sits on less than an acre but the farm is 100's of acres.
#2017	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Good point of clarification. Additional discussion is warranted on this parking ratio.
#1926	7.06.02 Parking Ratios
By: John Merrithew Tags: zoc Date:7/6/2021	Do these standards apply only to customer parking or are they assumed to accommodate employees. I ask because daycares, animal hospitals and other uses have a high number of employees and basing the parking on Gia seems to under count the parking demand.
#2018	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	ITE looks at all three of these parameters. We can look at other parameters to see if basing such ratios on employees or the number of children is more appropriate.

ID	Section
#1925	7.06.02 Parking Ratios
By: John Merrithew Tags: zoc Date:7/6/2021	Why are we specifying religious housing when it should be categorized as group or congregate housing?
#2019	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Group living type uses are separate uses in the use matrix and have a different ratios.
#1921	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Suburban parking ratios - at first glance a lot of these look unrealistic, but I associate myself with those who live in the Suburban area or live there.
#2021	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome discussion on parking ratios in all parts of the County.
#1920	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Suburban - SF detached - a maximum of 3/du is unrealistic
#2022	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome discussion on parking ratios in all parts of the County.
#1919	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	I concur with Ben Keethler's comments.

ID	Section
#2023	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome discussion on parking ratios in all parts of the County.
#1918	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	JLMA parking ratios - These should be the same as for the RPA (as amended by my comments, of course.)
#2024	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome discussion on parking ratios in all parts of the County.
#1917	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Parking in TPA - I associate myself with comments made by ZOC members who live or are involved with the TPA. I hope this is reciprocated with comments on the RPA.
#2025	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome discussion on parking ratios in all parts of the County.
#1916	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	<p>Parking ratios - Using ratios in the RPA is difficult as many uses are outdoors. Some other permitted uses can be somewhat vague, such as "Agritainment."</p> <p>I suggest changing some Permitted uses to "Minor Special Exception" whereby the Zoning Administrator can evaluate the proposed parking as part of his review process of the minor special exception process. These P uses should be changed to M: B&B Inn, Country Inn, Animal Care, Snack bars, Sit-down restaurants, Commercial winery, farm machinery, feedlot, feed & farm supply center, agricultural cultural center, Agritainment, cultural tourism and brewery limited.</p>
#2026	7.06.02 Parking Ratios

ID	Section
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome discussion on parking ratios in all parts of the County. Staff continues to work on definitions to clarify uses such as agritainment.
#1915	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Wineries - 2/winery is way too low.
#2033	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Other principal uses associated with a winery would be parked separately. We anticipate more direction on winery parking ratios throughout the process. We welcome the discussion.
#1914	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Wayside stand - 10/stand is too many. Suggest 3/stand
#2034	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We anticipate more direction on wayside stand ratios through our ZOC meetings. We welcome the discussion.
#1913	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Stables - This illustrates the absurdity of setting parking ratios for many uses. We operate a private stable. If our parking was insufficient, we'd not get boarders. If we provided excess parking, that would be an unnecessary cost. Just leave it alone!
#2035	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome the discussion regarding parking ratios for stables.
#1912	7.06.02 Parking Ratios

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Pet farm - This illustrates the foolishness of rural parking requirements. As written , parking is based on size of visitor area. Since visitors are outdoors, how on earth could you ever define the visitor area"?
#2036	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome additional discussion on pet farm parking ratios throughout the process. ITE categorizes a similar use of a zoo that is based upon acreage of the use.
#1911	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Brewery, limited - 2/1000 sf is way too small. I suggest 8/1000 sf with a max of 10/1000 sf
#2038	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We anticipate more direction on limited brewery parking ratios throughout the process. We welcome the discussion.
#1910	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Auction facility - livestock - Using sf won't work Does the square footage include the space taken up by livestock? Who knows?
#2040	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Square footage would be based on building or structure square footage. We welcome additional discussion.
#1909	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Recreation, outdoor - Since this is outdoor by definition, a per-sf parking ratio is silly. I suggest making sure that this use requires at least a minor SPEX and parking adequacy should be one of the factors in deciding whether to grant the SPEX.
#2041	7.06.02 Parking Ratios

ID	Section
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Agreed. Additional discussion with Staff has identified many different types of outdoor recreation uses and park uses that may vary in size and scope. Additional discussion and breakdown of such uses into separate parking ratios may be necessary.
#1908	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Equestrian event center - 5/1000 sf is way too much. Many of these are outdoor and a per square foot measurement is meaningless. When the event is inside a structure that building is very large (in the range of 18-20,000 sf, and a 5/1000 sf is ridiculous. The largest need is actually for horse trailer and truck) parking. The best solution is not to impose any minimum or maximum. (I write from a lot of experience at horse shows, from shows at local farms to large events at the Virginia Horse Center.)
#2043	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome the discussion and feedback on equestrian event center parking ratios.
#1907	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Art studio - Just use 1/Use as most artists work alone and not many of them receive visitors in the studios.
#2046	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome additional discussion on appropriate art studio parking ratios.
#1906	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Medical clinic - These are very parking-sensitive (ever been stuck in a crowded waiting room?) and the minimum should be around 8/11000 sf.
#2047	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome additional discussion on this use parking ratio.

ID	Section
#1905	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Rural retreat - Put a max of 4/1000 sf
#2048	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome the discussion on rural retreat uses.
#1904	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Religious land use - Suggest 6/1000 sf instead of 8/1000.
#2050	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome the discussion on religious uses.
#1903	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Convenience store with gas - parking should be 4/1000 sf + 1/pump
#2051	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome additional discussion on convenience store with gas parking.
#1902	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Food & Beverage - Food store and sit-down restaurants need maximum parking limits. Carry-out restaurants and snack bars should have a minimum of 2 spaces per USE (not per s.f.) and should have a maximum of 3/Use.

ID	Section
#2052	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome the discussion on food and beverage uses.
#1901	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Lodging - For the uses in this category, I am totally in favor of maximum parking limits as a way to control their impact on the rural areas.
#2053	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Noted. Thanks for the input. In future iterations, there will be further revisions to the parking ratios, taking into account these comments.
#1900	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Household Living (general) - DO NOT HAVE PARKING MAXIMUMS. See my comments about single-family dwellings, Also, homes in the west are generally on 3 or more acres, sometimes on much more, and the need for parking maximums is silly.
#2054	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We anticipate more direction on residential parking ratios throughout the process. We welcome the discussion.
#1899	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/5/2021	Rural parking: A maximum of 4 spaces per d.u. is unrealistic. Do not have a maximum. Many in the west have farm trucks, children's trucks, their own trucks, extra cars - in other words, a lot of vehicles. DO NOT HAVE A MAXIMUM.
#2055	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We anticipate more direction on residential parking ratios throughout the process. We welcome the discussion.

ID	Section
#9698	7.06.02 Parking Ratios
By: Judi Birkitt Tags: staff judi.birkitt@loudoun.gov Date:4/15/2022	Maximums in the RPA zoning districts have been removed.
#1892	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03(E). NEW CONSTRUCTION OR EXPANSION. How will this requirement apply to NEW construction of an "ag barn" that then becomes a Rural Use? Are all zoning permit requests reviewed for adequate parking requirements for "ag barns" converted to tasting rooms, event centers, agritainment venues, etc.?
#2056	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	The idea is that parking would be reviewed when a change of use occurs.
#1891	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03(D)(3) ALTERATIONS, EXPANSION AND CHANGES IN USE. How will this requirement apply to conversion of an "ag barn" to a Rural Use? Are all zoning permit requests reviewed for adequate parking requirements for "ag barns" converted to tasting rooms, event centers, agritainment venues, etc.?
#2058	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Expansion and change of use will be reviewed by Staff.
#1890	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-4 RPA Table. TEMPORARY USES. What are examples considered by Staff?
#2059	7.06.02 Parking Ratios

ID	Section
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Temporary uses would include things such as special events that do not operate on a reoccurring basis but on a limited basis. Temporary events are currently regulated in the zoning ordinance
#1889	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-5 JLMA Table. CRAFT BEVERAGE MANUFACTURING Why is this use requiring a higher ratio of 4/1000 sf than Limited Breweries or Farm Wineries? Has Staff looked at ACTUAL parking in EXISTING RPA JLMA Craft Beverage locations to evaluate ratios, or only used industry information from other areas? Although one might expect more parking in JLMA, is that the actual on-the-ground need as demonstrated by Existing operations?
#2060	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Individual parking studies were not conducted. We welcome the discussion on craft beverages.
#1888	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-4. RPA Table. BREWERY, LIMITED. How was a minimum of 2/1000 sf determined? Why are ratios LESS than Craft beverage manufacturing in JLMA of 4/1000 sf? Was any consideration given to parking requirements for tasting rooms, event venues, and current, actual, parking at EXISTING Limited Breweries, especially those that regularly hold events and large fundraisers? This will need to be evaluated again AFTER review of performance standards in Section 3.06.
#2061	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome additional discussion on limited breweries versus craft beverage manufacturing. Individual parking studies were not conducted.
#1887	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-3. TPA Table, 5.05.03-4. RPA Table. 5.05.03-5 JLMA Table. WINERY, VIRGINIA FARM. How (in the world) was a minimum of "2/winery" determined? Versus Qty/1000sf? Was any consideration given to parking requirements for tasting rooms and current, actual, parking at EXISTING Farm Wineries? With the actual volume of patrons, and known overflow parking to inappropriate rural areas ratios may need to be more in line with Restaurant.
#2062	7.06.02 Parking Ratios

ID	Section
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Thanks for pointing that out. We will continue to look into Virginia Farm Winery parking ratios and welcome the discussion. Other principal uses associated with wineries would be parked separately.
#1886	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-4. RPA Table. WINERY, COMMERCIAL. This use is listed twice -- under Food & Beverage Sales with a minimum of 2/1000 sf and again under Agriculture with minimum of "2/winery" (seriously?). Was any consideration given to parking requirements for tasting rooms, event venues, and current, actual, parking at EXISTING commercial wineries? With the actual volume of patrons, and known overflow parking to inappropriate rural areas ratios may need to be more in line with Restaurant.
#2063	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	That is an error under Food and Beverage Sales. We welcome the discussion. We welcome the discussion on parking ratios for commercial wineries. Principal uses associated with wineries would be parked separately.
#1885	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-3 TPA Table. 5.05.03-4 RPA Table. 5.05.03-5 JLMA Table. STOCKPILING. Although consistent with other waste-related uses, what is the .5/1000sf requirement based on? (Employee? building support for stockpiling?). Questions may be resolved when Performance Standards are reviewed at a later date.
#2064	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	The ratio would be based upon the GFA of buildings on a site.
#1884	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-5. JLMA Table. AGRITAINMENT. For the ratio of 3/1000 sf is this only for the building or does it include the agritainment area? If the latter, then should be more in line with outdoor recreation of 8/1000 sf. that indicates by area vs. building.
#2065	7.06.02 Parking Ratios
By: Rory Toth Tags: staff	Good point. Acreage may be a more appropriate parameter to utilize. We welcome additional discussion on agritainment parking ratios.

ID	Section
rory.toth@loudoun.gov Date:7/6/2021	
#1883	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	"5.05.03-3 TPA Table. 5.05.03-4 RPA Table. AGRITAINMENT / PERSONAL INSTRUCTIONAL SERVICES. How was it determined that a school primarily devoted to instruction in musical, dramatic , artistic, dance, martial arts, sports etc. would have the same parking minimum (3/1000 sf) as a potentially much more intense use of Agritainment (corn mazes, petting zoos allowing recreation and tourism)? EQUESTRIAN EVENT FACILITY is allotted 5/1000 sf. Has Staff looked at ACTUAL parking in EXISTING RPA agritainment locations to evaluate ratios, or only used industry information from other areas?"
#2066	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	These are based upon ITE parking standards. Individual parking studies on agritainment facilities were not conducted.
#1882	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-2 SPA Table. 5.05.03-3 TPA Table. RECREATION, INDOOR. What are the current parking requirements for this use? (could only find .33/person in permitted occupancy approved by the Fire Marshal plus 1 space/employee. Is that correct?) How does 5/1000 sf work for existing indoor rec facilities?
#2067	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	The 0.33 parking/person plus 1 space/employee is correct. Existing indoor recreation facilities would not have to meet this requirement, only if they expand or there is a change of use from lets say office to indoor recreation.
#1881	7.06.02 Parking Ratios
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-2 SPA Table. 5.05.03-3 TPA Table. 5.05.03-4 RPA Table. 5.05.03-5 JLMA Table. FUNERAL SERVICES. How was the Ratio of 2/1000 sf determined? Seems low or funeral homes with a chapel for services.
#2068	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov	It is based upon other best practices seen by the consultant in other jurisdictions they have worked on. We are open to further discussion.

ID	Section
Date:7/6/2021	
#1871	7.06.02 Parking Ratios
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:7/5/2021	Far be it for me to push for more parking, but we do want enough parking. I have some concerns about residential parking maximums in Suburban and Transition areas. With Loudoun housing prices skyrocketing, we have seen an increase in shared housing. Will on street parking be able to handle the overflow? If a home is built with a 2-car garage and 2 driveway spaces and then the owner rent's out the basement as an accessory unit, does the SFD then get to/have to provide an additional parking space? How does that get provided? Only on the street? Also, with the maximum of 4 spaces for a SFD unit, would that preclude any homes from having a 3-car garage? Any driveway leading to those would probably fit 2 cars, so that would be at least 5.
#2069	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Staff welcomes the discussion on residential parking minimums and maximums. Parking would need to be provided for the principal SFD use and the accessory dwelling unit as well. We are not precluding garages from having three parking spaces.
#1840	7.06.02 Parking Ratios
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	RE: Parking requirements per employee (guest, visitor, attendee) Make clear that this is based on the maximum at any given time, not over the course of a day.
#1870	7.06.02 Parking Ratios
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:7/5/2021	Possibly add "for any given shift"?
#2005	7.06.02 Parking Ratios
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	That type of metric is nearly impossible to count, keep track of, and enforce.
#2009	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Comment to be taken into consideration to clarify how the # of employees are quantified.

ID	Section
#1865	7.06.02 Parking Ratios
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:7/5/2021	Residential communities across the county are generally under parked, but the issue is most severe for those in the Suburban and Transition Policy areas. For single family detached across the board, minimum standards in these areas should be increased to 2/DU. Maximum limits are self governing and should be removed.
#2010	7.06.02 Parking Ratios
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	We anticipate more direction on residential parking ratios throughout the process. We welcome the discussion.
#1864	7.06.02 Parking Ratios
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:7/5/2021	Urban PA: Dwelling, single-family detached - This is only policy area that has an (*) for this category. Section 5.05.14 does not provide any requirements for single family detached.
#2008	7.06.02 Parking Ratios
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	This should have a rate instead of an asterisk. Human error.
#2012	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	To clarify, SFA and MF ratios identified with an asterisk (*) in the tables follow the requirements and ratios for residential uses in Section 5.05.14 Specific Residential Design Type Parking.
#1848	7.06.02 Parking Ratios
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Extractive Industries These are typically rock quarries. Outdoor with few buildings and little floor area. How does one parking space per 1000 sf work? These uses may have offices, where office rates may be appropriate, and warehouse areas, where warehouse rates might be appropriate.
#2006	7.06.02 Parking Ratios
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	The parking ratios and the best metric for extractive industries is open for discussion. The office and warehouse areas will be parked according to square footage.

ID	Section
#1847	7.06.02 Parking Ratios
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Equestrian Event Facility In most of these facilities, the space is dedicated to riding rinks and horse stalls. Why would anyone need parking at all for such gross floor area, let anyone one parking space per 250 square feet.
#2070	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Staff welcomes additional discussion on equestrian event facilities. Staff is unsure of the reference to 1 parking space per 250 square feet as this is not a ratio referenced for this use.
#1846	7.06.02 Parking Ratios
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Separate Parking Requirements for different policy areas Unnecessary and overly complicated. Generally, the uses create the same parking needs regardless of which policy area they are located in.
#2071	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Staff welcomes the discussion on parking ratios throughout the County. The best way to simplify and create a document that is easy to use is a mutual goal.
#1845	7.06.02 Parking Ratios
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Religious Land Use Really covers a myriad of different uses with different needs. Why is twice as much parking required as non-religious assembly or a community center? Huge increase over current requirement (1 per 4 attendees).
#2072	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	These are based upon ITE and industry best practices researched by our consultant. We welcome the discussion on these uses.
#1844	7.06.02 Parking Ratios
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Government - Really?? Only one space per 200 square feet? What do you have now for the government center?

ID	Section
#2011	7.06.02 Parking Ratios
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Where is there a 1/200 sf ratio in the tables for a government use? Request further clarification on this comment.
#1843	7.06.02 Parking Ratios
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Parking Ratios: Too much reliance on gross floor area, as opposed to building occupancy. Base requirements on actively used space that generates the traffic, not gross floor area. For restaurants, base requirement on dining area. Kitchen and storage areas can vary greatly in proportion to the number of diners. An office building should not be required to provide parking for dedicated storage areas. (Case of the lawyer's office with extensive document storage.)
#2045	7.06.02 Parking Ratios
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:7/6/2021	Comment to be taken into consideration to clarify gross floor area and different uses.
#2057	7.06.02 Parking Ratios
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	We welcome the discussion on basing such ratios on occupancy.
#1842	7.06.02 Parking Ratios
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Maximums can be problematic, especially for small uses where deviations can be greater. For a large apartment building, the deviations get averaged out, but a small complex may need more parking spaces to address both greater deviation and special conditions. Liberally allow administrative waivers. Is it really a problem in any case? What commercial entity goes to the expense of purposefully building excessive parking? With regards to individual homes: Well-to-do individuals may be car collectors There may be big and extended families with a multitude of cars.
#2042	7.06.02 Parking Ratios
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:7/6/2021	Noted. The use of parking maximums is a common tool by localities to implement policies similar to the 2019 GP. The parking adjustments section was added so that reasonable justifications could be considered by the Zoning Administrator. For Single-Family Detached, this is certainly open for discussion and revision.

ID	Section
#1841	7.06.02 Parking Ratios
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Why have separate metrics explanations for cars, bicycles, etc? Aren't measurements made the same way for each?
#2037	7.06.02 Parking Ratios
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:7/6/2021	Bicycles, electric vehicles were included in Section 5.05.03.A (8&9) to clarify what the measurement metric meant. Does this make sense? We're open for discussion.
#1836	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/1/2021	Parking for healthcare uses is too low. Ever seen how many people are sitting in waiting rooms?
#2032	7.06.02 Parking Ratios
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:7/6/2021	We anticipate more direction on healthcare uses throughout the process, we welcome the discussion.
#1835	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/1/2021	The office parking ratios are absurdly low. We developed millions of square feet adjacent to mass transit, but we always built enough of our own parking at a general ratio of 2/1000 sf.
#2031	7.06.02 Parking Ratios
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:7/6/2021	We anticipate more direction on office uses throughout the process, we welcome the discussion.
#1834	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/1/2021	General comment: I am totally against any attempt to impose maximum parking limits. No owner will ever construct more parking than a project really needs, nor will he under-build. Imposing maximums is simply an idealistic exercise that won't work.

ID	Section
#2030	7.06.02 Parking Ratios
By: Ryan Reed Tags: ryan.reed@loudoun.gov Date:7/6/2021	We welcome discussion on parking ratios in all parts of the County. The use of parking maximums is a common tool by localities to implement policies similar to the 2019 GP. We look forward to the discussion.
#1833	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/1/2021	Hotel/motel ratio is low.
#2029	7.06.02 Parking Ratios
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:7/6/2021	We welcome discussion on the hotel/motel parking ratios in all parts of the County.
#1832	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/1/2021	SF detached in Urban area will still have parking requirements.
#2028	7.06.02 Parking Ratios
By: Ryan Reed Tags: ryan.reed@loudoun.gov Date:7/6/2021	Correct. See Section 5.05.12.
#1831	7.06.02 Parking Ratios
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/1/2021	Live-work dwelling, rooming, congregate housing etc. should have 1 space per bedroom.
#2027	7.06.02 Parking Ratios
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:7/6/2021	We welcome the discussion on parking ratios for live-work dwelling, rooming, congregate housing, etc.

ID	Section
#11037	7.06.01 Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.05.03(D)(3) ALTERATIONS, EXPANSION AND CHANGES IN USE. How will this requirement apply to conversion of an ""ag barn"" to a Rural Use? Are all zoning permit requests reviewed for adequate parking requirements for ""ag barns"" converted to tasting rooms, event centers, agritainment venues, etc.? Staff Response: Expansion and change of use will be reviewed by Staff. 2022 Round 3 Input: All applications for ""ag barns"" should be more stringently reviewed for actual end use due to the known activities of applying for/building an ""ag barn"" for conversion to a high-intensity use. "
#11028	7.06.01 Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.05.01.C. APPLICATION TO ADDITIONAL OR CHANGE IN USE. Will/does this requirement apply to ""ag barns"" converted or newly constructed to house high-intensity tourist venues for tasting rooms and events? The quantity of parking for high-intensity uses with tasting rooms is unreasonably low, thereby calling into question the Applicability for an addition or change in use for tasting room and other high-intensity tourist venues. Staff Response: We can change the parking rate for the tasting use. Any new use that greatly intensifies an existing use (i.e. additions, expansion, etc.), will have to meet the new minimums/maximums. Usually, the addition will have to provide more parking 2022 Round 3 Input: Parking ratios for ""tasting use"" should applied separately from the primary beverage use."
#9937	7.06.01 Applicability
By: William Junda Tags: zoc bjunda@gordon.us.com Date:5/2/2022	E. procedures for reduction of parking incorrectly references 5.05.09; should be referencing 5.05.08
#6273	7.06.01 Applicability
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/27/2021	5.05.02 C Agree that application shall include location and dimensions of parking and means of ingress and egress.
#6272	7.06.01 Applicability
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/27/2021	Agree that parking required for multiple uses must be cumulative for each use.
#2136	7.06.01 Applicability

ID	Section
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/11/2021	In the RPA, change the minimum lot size for storing an inoperable vehicle to 3-acres. Not all inoperable vehicles are abandoned. Many may be personal projects. No reason to require the 10-acre minimum.
#2172	7.06.01 Applicability
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/13/2021	For the most part, the RPA does not have residential zoning districts. For example AR1 and AR2 are not residential districts, so this regulation would not apply.
#1937	7.06.01 Applicability
By: John Merrithew Tags: zoc Date:7/6/2021	Is there a discussion somewhere about how mix of uses in the same project effects the required parking? Is mixed use center a use with its own ratios?
#1959	7.06.01 Applicability
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Multiple uses in one building will use the given parking ratio for that particular use and combine required parking for all uses. For instance, if there's a building with 5000 sf office and 5000 sf retail, and the office rate is 2/1000 sf and the retail is 4/1000 sf, then 10 spaces for the office use is required and 20 spaces for the retail is required. This combined total would amount to 30 spaces required for the building. On another note, I'm pretty sure we removed the mixed use building use from the use table so there's no specific ratio for that use.
#1924	7.06.01 Applicability
By: John Merrithew Tags: zoc Date:7/6/2021	Section E refers to making exceptions for vehicle stacking in addition to parking and loading. What is vehicle stacking in this case?
#1962	7.06.01 Applicability
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Vehicle stacking essentially is the queuing of cars in a drive through type lane/area. You typically see 15 cars in the drive through lane at Starbucks, that's vehicle stacking. Vehicle stacking regulations will be an item under consideration for the FSM.
#1923	7.06.01 Applicability
By: John Merrithew Tags: zoc Date:7/5/2021	I agree with Eric that inoperable vehicles are a property maintenance issue and not a zoning issue. They should be in the Codified ordinance with tall grass and trash regulations.
#1960	7.06.01 Applicability

ID	Section
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Thank you for the feedback. This is open for discussion and consideration within the County as well regarding the appropriate location for inoperable vehicles.
#1877	7.06.01 Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-4 RPA Table. RURAL RESORT. Ratios are 2.5/1000sf in SPA, .5/guest room in TPA and 1.25/guest room in RPA. This seems inconsistent and illogical without explanation. Also, has Staff done a "math analysis" of the ratio's comparing Rural Resort in RPA to Country Inn in RPA to ensure consistency and avoidance of "picking" one over the other only to reduce parking costs?
#1880	7.06.01 Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	MOVE TO SECTION 5.05.03
#1978	7.06.01 Applicability
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	This research is something that Staff can consider moving forward.
#1983	7.06.01 Applicability
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Comment is not tagged in EnCodePlus. Please verify which section is recommended to be moved.
#1998	7.06.01 Applicability
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Additional input from ZOC on these ratios is welcomed. Parking ratios utilize ITE as a basis. No individual parking studies were performed.
#1999	7.06.01 Applicability
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	ITE Parking Manual was the basis for these rates. No individual parking studies were performed. Additional research is something staff can consider moving forward.
#1876	7.06.01 Applicability

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-2 SPA Table. 5.05.03-3 TPA Table. RURAL RESORT. Where does this apply in the SPA? Why are the parking ratios in SPA 2.5/1000sf, but only .5/guest room in TPA? What's the logic behind the different ratios?
#1879	7.06.01 Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	MOVE TO SECTION 5.05.03
#1979	7.06.01 Applicability
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Comment is not tagged in EnCodePlus so it is difficult to determine which section is being referred to. Please confirm which section in EnCodePlus is tied to this comment.
#2082	7.06.01 Applicability
By: Rhys Wilson Tags: rwilson@planningandlaw.com Date:7/6/2021	I think she copy and pasted these comments in the next section.
#1875	7.06.01 Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.03-2 SPA Table. 5.05.03-3 TPA Table., 5.05.03-4 RPA Table. COUNTRY INN. Does the ratio apply to "cottages" and if so, will the quantity of bedrooms w/in a "cottage" count as .75 in RPA (vs. the .25 in SPA & TPA)?
#1878	7.06.01 Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	MOVE TO SECTION 5.05.03
#1982	7.06.01 Applicability
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/6/2021	Further follow-up discussion is necessary on this question.

ID	Section
#1874	7.06.01 Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.02.F. INOPERABLE VEHICLES. How is this enforced today, and does enforcement differ between policy areas? (i.e., proactive vs. reactive by complaint only?)
#1965	7.06.01 Applicability
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	The enforcement is not proactive.
#1975	7.06.01 Applicability
By: Rory Toth Tags: rory.toth@loudoun.gov Date:7/6/2021	Zoning enforcement in the County is complaint driven, except for some areas in the Sterling Park area of the Suburban Policy area, which are proactive enforcement areas. It is noted that the inoperable vehicle regulations apply in residential zoning districts.
#1873	7.06.01 Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/5/2021	5.05.02.B. APPLICATION TO ADDITIONAL OR CHANGE IN USE. Will/does this requirement apply to "ag barns" converted or newly constructed to house high-intensity tourist venues for tasting rooms and events? The quantity of parking for high-intensity uses with tasting rooms is unreasonably low, thereby calling into question the Applicability for an addition or change in use for tasting room and other high-intensity tourist venues.
#1969	7.06.01 Applicability
By: Rhys Wilson Tags: rwilson@planningandlaw.com Date:7/6/2021	We can change the parking rate for the tasting use. Any new use that greatly intensifies an existing use (i.e. additions, expansion, etc.), will have to meet the new minimums/maximums. Usually, the addition will have to provide more parking.
#1869	7.06.01 Applicability
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:7/5/2021	I agree with Eric. Section F "Inoperable Vehicles". seems out of place here. Previous ZO, does define both "Major Recreational Equipment" and "Recreational Vehicle Unit." Is it correct to say that RVs are a subset of Major Rec Equipment? Are these Inoperable Vehicle sections new to this ZO to address a problem or are they carryovers from previous ZO?
#1967	7.06.01 Applicability

ID	Section
By: Rhys Wilson Tags: rwilson@planningandlaw.com Date:7/6/2021	Inoperable vehicles is under consideration for it's appropriate location. Yes RV's are a subset of Major Rec Equipment. See section 5.05.08 Oversized Vehicle parking for more clarity.
#1868	7.06.01 Applicability
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:7/5/2021	Section B - Isn't it likely that a change in intensity may result in a use going over the new maximum limits? Should that be addressed specifically?
#1964	7.06.01 Applicability
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	We can ask staff for further guidance on an approach that can tackle this request.
#1839	7.06.01 Applicability
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Does the inoperable vehicles section belong in the zoning ordinance, or is it better in the County Codes? Is "major recreational equipment" defined? Do such apparatus need parking? How do you determine when such are inoperable? Do you mean recreational vehicles?
#1966	7.06.01 Applicability
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Further discussion with DPZ leadership staff and the County Attorney is necessary to determine if such provision could belong in the County Code. Major recreational equipment is currently defined in the Zoning Ordinance. Further details on parking for inoperable vehicles, rec equipment, commercial vehicles, etc. are in section 5.05.08 Oversized Vehicle Parking.
#1838	7.06.01 Applicability
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Some site uses are not simultaneous. How is this addressed in the new ordinance? One example is that churches today often have a family center as well as a sanctuary.h are not occupied simultaneously.
#1968	7.06.01 Applicability
By: Rhys Wilson Tags: rwilson@planningandlaw.com Date:7/6/2021	I can see that being an enforcement subject. Maybe having peak parking times but that is an enforcement thing. For instance, we can say 100 spaces are needed for the sanctuary, while 50 are needed for the family center, thus making the site need 150 total spaces. If we say we only need 100 spaces in general because both uses aren't used at the same time, does that create an

ID	Section
	enforcement issue? Consideration for parking adjustments and getting that Section right may address this point?
#1837	7.06.01 Applicability
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/3/2021	Practice has been that when expanding a use the original provision of parking has been grandfathered, and that additional parking need only be provided for the expansion or added use. Is this practice expressly continued in the new text?
#1963	7.06.01 Applicability
By: Rhys Wilson Tags: staff rwilson@planningandlaw.com Date:7/6/2021	Parking would apply to the expansion part of the use or a new use. See 5.05.02.B of this section
#2456	7.06 Parking
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/20/2021	From the Code Audit: "Communities are increasingly responding to the issues identified above by either optimizing and reducing their parking minimums or getting rid of them altogether. Eliminating parking minimums will leave the supply of parking to the marketplace." As many have noted, we should eliminate many of the draft requirements, esp. for commercial uses.
#2460	7.06 Parking
By: Rory Toth Tags: rory.toth@loudoun.gov Date:7/20/2021	Will continue to reexamine parking ratios for all uses.
#2226	7.06 Parking
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/16/2021	A principal purpose of the zoning re-write is to provide an easier to use and more user friendly document.
#2295	7.06 Parking
By: Rory Toth Tags: staff rory.toth@loudoun.gov Date:7/19/2021	Thanks for the comment. We will continue to refine text to make it user friendly. In keeping with this direction, the draft parking standards section carries forward some existing parking standards and includes new context-sensitive draft parking ratios and regulations into one parking section that implement Loudoun County 2019 General Plan (2019 GP) policy guidance, including policies in the 2019 CTP. Proposed parking sections also consolidate parking related

ID	Section
	regulations that are currently found throughout the existing Zoning Ordinance into one section. Consolidated examples include: Sections 5.05.11 and 5.05.12.
#1863	7.06 Parking
By: Eric Zicht Tags: zoc zicht@erols.com Date:7/4/2021	The corresponding section of the existing ordinance is 13 pages. This looks like 61 pages. Not a simplification. Not user-friendly.
#1961	7.06 Parking
By: Rory Toth Tags: rory.toth@loudoun.gov Date:7/6/2021	The draft parking standards section carries forward some existing parking standards and includes new context-sensitive draft parking ratios and regulations that implement Loudoun County 2019 General Plan (2019 GP) policy guidance, including policies in the 2019 CTP. Proposed parking sections also consolidate parking related regulations that are currently found throughout the existing Zoning Ordinance into one section. Consolidated examples include: Sections 5.05.11 and 5.05.12.
#7716	7.05.03 Noise
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/24/2022	C.5 Being required to measure the sound at the property line, may not yield the point of greatest noise impact. Such a point may be topographically low relative to both source and the receiving location on the adjacent property. I'd suggest amending this to indicate that the sample be taken no closer than the property line, but may be taken anywhere, especially close to a residence where the sound is actually being heard.
#7954	7.05.03 Noise
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	The suggestion will be considered for revision.
#9570	7.05.03 Noise
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:4/9/2022	revised to address comment
#7670	7.05.03 Noise

ID	Section
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	I concur with the points raised by other ZOC members for this section. There are most specific and consistent standards for uses/noise that could be made to reduce quality of life impacts on adjacent or nearby residents.
#8035	7.05.03 Noise
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Noted. We will take all of these comments under consideration while revising.
#7531	7.05.03 Noise
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:1/20/2022	E.4. Suggest a distinction be made between generators being tested, and those operating during an emergency. Suggest generator testing be limited to between the hours of 9:00 AM to 5:00 PM
#7547	7.05.03 Noise
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/20/2022	Revised accordingly.
#7530	7.05.03 Noise
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:1/20/2022	F.2. It is not clear to me what "designed for a single family home" means. Does it mean zoned or part of an approved subdivision?
#7766	7.05.03 Noise
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/24/2022	I believe this is a typo and should have said designated instead of "designed".
#7273	7.05.03 Noise
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	"5.08.04.F PERFORMANCE STANDARDS. NOISE Standards for Specific Uses states, ""The following noise standards apply to specific uses in this section when they are expressly referenced in the standards for the specific use in Chapter 3."" This does not apply the noise standards listed consistently across ALL uses, and therefore provide inconsistent protections to adjacent properties and area residents (Single family residential use within 250 feet). If this ONLY applies to those use WITH Use-Specific Standards in Ch. 3 then HIGH-

ID	Section
	INTENSITY USES that have been a primary cause of complaints for noise from outdoor music and events will not be covered. It also inconsistently applies regulations for outdoor music hours not permitted after 11pm. (e.g., applies to B&B weddings and event centers but not breweries/wineries). Because these standards are inconsistent and have known, (documented impacts via LEx complaints, emails and letters over many years), how and when will this be reviewed and rectified?"
#7767	7.05.03 Noise
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/24/2022	We can consider applying this provision generally if appropriate.
#7272	7.05.03 Noise
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.04 PERFORMANCE STANDARDS. NOISE. EXEMPTIONS. Shouldn't there also be a section that lists what sounds are prohibited and at what times they are prohibited? Should time limits be added to this section or should there be a reference to time limit information?
#7951	7.05.03 Noise
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	This section is carried over from the current ordinance where there isn't prohibitions or time limit information.
#7271	7.05.03 Noise
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.04.E. PERFORMANCE STANDARDS. EXEMPTIONS. Why are sounds associated with power equipment given a blanket exemption? Why isn't there more specificity to the exemption with regard both to the type of power equipment in use and to the duration of the noise. It is not hard to imagine situations in which unusually loud equipment is used and/or power equipment is used for an unusually long period of time.
#7952	7.05.03 Noise
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	The requirement or lack of requirements is consistent with current Zoning Ordinance language and practice. For further consideration, imagine the number of lawnmowers in the community and the myriad of reasons why people mow their lawn when they do and the fact that the noise they produce is a product of their nature (controlled by the manufacturer) limits on noise and time would be impossible or at least impractical to enforce.

ID	Section
#7270	7.05.03 Noise
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.04 PERFORMANCE STANDARDS. NOISE. Methods of Measurement. 3. Who is the "operator," how are they contacted, and what are the response times for measurement by complaints?
#7953	7.05.03 Noise
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	The operator is the person taking the sound measurement. Procedures for addressing violations are listed under the Zoning Administrators duties in Chapter 11 which is still under development.
#7269	7.05.03 Noise
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.04-1 PERFORMANCE STANDARDS. NOISE. TABLE Where do sound levels and time limits for stockpiles fall on this chart if thousands of truckloads are being used to create or partially dismantle a "personal recreational field" or other use such as a brewery or winery? Is it considered a rural economy use?
#7955	7.05.03 Noise
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	The noise in this example is from trucks, not the stockpile, and would fall under the general guidelines provided unless exempt. The number of trucks seems extreme but would likely be regulated or better regulated through conditions on a SPEX or result from a required traffic study.
#7268	7.05.03 Noise
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.04 NOISE Should there be a section on waivers?
#7956	7.05.03 Noise
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	It can be considered although exemptions, SPEX conditions and proffers may be sufficient to address special concerns. There are currently no guidelines for waivers in the ZO.
#7236	7.05.03 Noise

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	5.08.04.F.3. Suggest no outdoor music after 9:00 PM Sunday - Thursday; and until 11:00 PM Friday and Saturday.
#7768	7.05.03 Noise
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/24/2022	We can consider this comment when looking at alignment between performance standards, use specific performance standards, and hours of operation for use specific standards.
#13323	7.05.02 Light and Glare
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	5.08.05 D. 6. c., 7, & 8. There should not be exemptions for safety or recreational lighting regarding new color temperature requirements or for full shielding. Safety lights should not be lighting parking areas or offsite away from buildings.
#13322	7.05.02 Light and Glare
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	In D. Standards, Add a standard to specify light color temperature (Kelvin) must not exceed 3,000 Kelvins as an exterior lighting standard, and the lower the better per International Dark Sky Association standards.
#13320	7.05.02 Light and Glare
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	5.08.05.C.3 Road or street lighting within public or private road right of way-- 5.08.05.3 should not be excluded from compliance with full shielding and color temperature standards.
#13317	7.05.02 Light and Glare
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	5.08.05.A references exemptions noted in B, but should say C.
#11013	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE A. GENERAL REQUIREMENTS. Recommend that Staff consider the use of defined Zones that each District in the County be assigned. Lighting Zones are recommended by the Dark Sky Association. Implementing lighting zones will allow different amounts of light in areas with different nighttime characteristics. Zones can be defined based

ID	Section
	<p>on ambient light levels, population density, and other community considerations. For example, the downtown Sterling area would require different standards for outdoor lighting than would a residential zone in Purcellville/Hillsboro areas. The Model lighting Ordinance (“MLO”) developed by the International Dark-Sky Association (“IDA”) and the Illuminating Engineering Society (“IES”) provides examples of lighting zones that could be adopted/modified by Loudoun and delineated in the revised ZO. Each standard for specific use defined in Chapter 3 could then reference the applicable zone as defined in section 5.08.05. Copy of the MLO available here: https://loudouncoalition.org/wp-content/uploads/2022/01/MLO_FINAL_June2011.pdf Staff Response: Comments and suggestions acknowledged and will be considered"</p>
#11012	7.05.02 Light and Glare
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE. Once the revised ZO is completed and approved, the County should develop “cheat sheet” graphics detailing Loudoun’s lighting ordinance for residential and non-residential areas/districts. These graphics will provide an easy-to-follow guides with the rules for Loudoun citizens and businesses to follow, thus ensuring compliance with the regulations from the start. Samples of those developed and used by Fairfax County can be found here: https://loudouncoalition.org/wp-content/uploads/2022/01/FAIRFAX-Res-Non-Res-Lighting-Zoning-Regs.pdf Staff Response: Comments and suggestions acknowledged. Graphics are being considered for inclusion in many sections of the Ordinance for clarity and ease of application" STATUS?</p>
#11011	7.05.02 Light and Glare
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE Why isn't there a “DEFINITIONS” section here similar to that in other sections of the draft revised ZO? Recommend that Staff consider adding Definitions, as appropriate. The International Dark-Sky Association (“IDA”) and the Illuminating Engineering Society (“IES”) have jointly created a Model lighting Ordinance (“MLO”) for local jurisdictions. This document contains numerous definitions that could be adopted and incorporated into the revised ZO. Copy of the MLO available here: https://loudouncoalition.org/wp-content/uploads/2022/01/MLO_FINAL_June2011.pdf Staff Response: Comments acknowledged and can be considered for inclusion. See comments elsewhere regarding dark sky"</p>
#11010	7.05.02 Light and Glare
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE Recommend that Staff consider adding a clause that would address exceptions to the APPLICABILITY clause. The revised (March 2021) Fairfax County Ordinance, section 5109, provides examples of exceptions that Fairfax added to its ZO. Such exceptions used by Fairfax include, but are not limit to: lighting fixtures and</p>

ID	Section
	standards required by the Federal Communications Commission, Federal Aviation Administration, Federal and State Occupational Safety and Health Administrations, or other federal, state, or county agencies, to include street lights within the public right-of-way. Routine lighting fixture maintenance, and Holiday lighting fixtures. section 5109 can be found here: https://online.encodeplus.com/regs/fairfaxcounty-va/doc-viewer.aspx?tocid=001.006.010#secid-255 Staff Response: "Comment acknowledged." STATUS?
#11007	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.08.05.D PERFORMANCE STANDARDS. LIGHT & GLARE: 2022 Round 3 Input: Add language to address seasonal lighting at commercial establishments such as: "Seasonal lighting is permissible from Thanksgiving to January 15 at commercial businesses except between the hours of 10:00 PM to 6:00 AM. All outdoor lighting displays must be contained within 150 feet of any commercial building."
#11006	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.08.05.D PERFORMANCE STANDARDS. LIGHT & GLARE Standards for Specific Uses states, "The following light and glare standards apply to specific uses in this section when they are expressly referenced in the standards for the specific use in Chapter 3." This does not apply the light and glare standards listed consistently across ALL uses, and therefore provide inconsistent protections to adjacent properties and area residents. If this ONLY applies to those use WITH Use-Specific Standards in Ch. 3 then high-intensity uses with complaints for light and glare from activities and events will not be covered. It also inconsistently applies regulations for exterior lighting hours to be extinguished between 10pm and 6am. Staff Response: If this comment recommends applying what currently applies only to specific "5-600" uses to all uses as a general performance standard, we acknowledge the recommendation and will take this shift under consideration 2022 Round 3 Input: No reference is made for "lighting" in November/December not religious or religion oriented that has received complaints for large displays on mountainside properties visible for long distances. This should not have "religious exemption" applied. These standards are inconsistent and have known impacts to Dark Sky and conflict with the 2019 comp plan. "
#11005	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.08.05. PERFORMANCE STANDARDS. LIGHT & GLARE. Do the light and glare standards apply to seasonal commercial lighting? Do the light and glare standards apply to all vineyards, wineries, breweries? If not why not? STAFF RESPONSE TO ZOC: Interpreted questions of "seasonal" as "religious." However, actual use is tied to charity events, not religious celebration. 2022 Round 3 Input: Original request still stands."

ID	Section
#11004	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.08.05. PERFORMANCE STANDARDS. LIGHT & GLARE. Do the light and glare standards apply to seasonal commercial lighting? Do the light and glare standards apply to all vineyards, wineries, breweries? If not why not? STAFF RESPONSE TO ZOC: Interpreted questions of ""seasonal"" as ""religious."" However, actual use is tied to charity events, not religious celebration. 2022 Round 3 Input: Original request still stands."
#11003	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.08.05.A.4 PERFORMANCE STANDARDS. LIGHT AND GLARE How do guidelines for permitted Public facilities align with General Policy Dark Sky Ordinances? 5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE. How do the 5.08.05 Light and Glare regulations adhere to the Dark Sky Ordinance in general? Staff Response: Aware of references in GP to dark sky guidelines. Additional research is needed before an answer can be provided. Standards to address the issue can be considered"
#10998	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.08.05. PERFORMANCE STANDARDS. LIGHTING. Standards for Specific Uses states, ""The following noise standards apply to specific uses in this section when they are expressly referenced in the standards for the specific use in Chapter 3."" This does not apply the LIGHTING standards listed consistently across ALL uses, and therefore provide inconsistent protections to adjacent properties and area residents. If this ONLY applies to those use WITH Use-Specific Standards in Ch. 3 then HIGH-INTENSITY USES that have been a primary cause of complaints for LIGHTING from outdoor events will not be covered. It also inconsistently applies hours to extinguish lighting. Because these standards are inconsistent and have known, (documented impacts via LEX complaints, emails and letters over many years), how and when will this be reviewed and rectified? STAFF RESPONSE: ""We can consider applying this provision generally if appropriate."" 2022 ROUND 3 INPUT: APPLY PROVISION GENERALLY TO ALL HIGH-INTENSITY USES FOR COMPLIANCE AND CONSISTENCY."
#10997	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.08.05. PERFORMANCE STANDARDS. LIGHTING. Where are the zoning regulations to comply with Dark Sky requirements as outlined in the 2019 Comprehensive Plans? Staff Response: As noted in previous comments regarding dark sky, references in GP are acknowledged and additional evaluation of the referenced material is needed to determine if revisions are appropriate 2022 Round 3 Input: Dark Sky regulations to comply with 2019 Comp Plan must be addressed and included."
#10268	7.05.02 Light and Glare

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:6/17/2022	The alpha numbering is off in this section: A. Applicability refers to exemptions as "B" instead of "C". Exemptions refers to Standards as "C" instead of "D". Please fix soon as this is causing questions and confusion.
#7676	7.05.02 Light and Glare
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:1/24/2022	D. 3. should we require the light be directed downward to avoid horizontal glare?
#7764	7.05.02 Light and Glare
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/24/2022	added an angling requirement for shielded lighting fixtures.
#7671	7.05.02 Light and Glare
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	A. General Requirements. The color of LED lighting matters and should be added to the requirements. Yellow, amber, red spectrum lights have a demonstrably less disruptive impact on insects critical to pollination and thereby the timing of plant flowering that depends on insects. Bright white/blue spectrum lights are the most disruptive. This is important across the county, but most important in the rural area, which should have as little nighttime lighting as possible to have the least ecosystem impact. Lighted ballfields in the rural area would seem to have the greatest potential for negative impacts. Here are two articles, among many that provide more general information: https://wildlife.org/increasing-use-of-led-lamps-may-affect-wildlife/ https://www.darksky.org/our-work/lighting/lighting-for-citizens/lighting-basics/
#7957	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	Can be considered for revision but substantial research and justification will be needed to support inclusion of such requirements.
#7337	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE How does a citizen go about the process for determining and then rectifying an out of compliance light or glare infraction?

ID	Section
#7958	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	The same as any complaint about a Zoning violation, contact Enforcement. Citizens should not be measuring light or glare infractions.
#7335	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.08.05.A.4 PERFORMANCE STANDARDS. LIGHT AND GLARE How can a resident determine if the lumens or foot candles allowed by public facility athletic fields are in accordance with standards? For example, if a resident can see the Tuscarora HS lights from over 6 miles away how can a resident generally determine compliance before submitting a complaint?
#7959	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	It is not up to citizens to do the measuring, only to report the complaint of non-compliance to Enforcement.
#7334	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.08.05.D.2 PERFORMANCE STANDARDS. LIGHT AND GLARE How do standards apply to event facilities located in ARN considered as "Ag Use" ? There are known locations / buildings in rural neighborhoods whose lights remain on all night long. They are not illuminating a sign or for "safety." They illuminate the building itself. Some buildings are highly viewable from over a mile away. The rules read that this is not permissible, is that correct?
#7517	7.05.02 Light and Glare
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/19/2022	A Banquet/Event Facility under proposed Section 3.06.04.05.C is subject to the Light and Glare Standards for Specific Uses under Section 5.08.05.D. Illuminated signs for a Banquet/Event Facility would be prohibited pursuant to Section 5.08.05. Under the R93 Zoning Ordinance, this prohibition on illuminated signs under Section 5-652(A)(4) can be modified by minor special exception.
#7333	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.08.05.A.4 PERFORMANCE STANDARDS. LIGHT AND GLARE How do guidelines for permitted Public facilities align with General Policy Dark Sky Ordinances? 5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE. How do the 5.08.05 Light and Glare regulations adhere to the Dark Sky Ordinance in general?

ID	Section
#7960	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	Aware of references in GP to dark sky guidelines. Additional research is needed before an answer can be provided. Standards to address the issue can be considered.
#7288	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.08.05.D PERFORMANCE STANDARDS. LIGHT & GLARE: Add language to address seasonal lighting at commercial establishments such as: "Seasonal lighting is permissible from Thanksgiving to January 15 at commercial businesses except between the hours of 10:00 PM to 6:00 AM. All outdoor lighting displays must be contained within 150 feet of any commercial building."
#7511	7.05.02 Light and Glare
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/19/2022	Seasonality would be difficult to implement without a specific legal impetus either under the Code of Virginia or another form of enabling legislation. We want to avoid regulations with religious freedom implications.
#7287	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	"5.08.05.D PERFORMANCE STANDARDS. LIGHT & GLARE Standards for Specific Uses states, ""The following light and glare standards apply to specific uses in this section when they are expressly referenced in the standards for the specific use in Chapter 3."" This does not apply the light and glare standards listed consistently across ALL uses, and therefore provide inconsistent protections to adjacent properties and area residents. If this ONLY applies to those use WITH Use-Specific Standards in Ch. 3 then high-intensity uses with complaints for light and glare from activities and events will not be covered. It also inconsistently applies regulations for exterior lighting hours to be extinguished between 10pm and 6am. No reference is made for ""holiday lighting"" that has received complaints for large displays on mountainside properties visible for long distances. Because these standards are inconsistent and have known impacts, how and when will this be reviewed and rectified?"
#7513	7.05.02 Light and Glare
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/19/2022	If this comment recommends applying what currently applies only to specific "5-600" uses to all uses as a general performance standard, we acknowledge the recommendation and will take this shift under consideration.
#7286	7.05.02 Light and Glare

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.05.C PERFORMANCE STANDARDS. SPECIAL EXCEPTION REVIEW FOR LIGHTING THAT DOES NOT COMPLY WITH STANDARDS. Should add: "Neighborhood meetings are required."
#7961	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Special Exception hearings should address neighborhood inclusion.
#7285	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.05.A. PERFORMANCE STANDARDS. LIGHT AND GLARE, GENERAL STANDARDS. Shouldn't there be required neighborhood meetings when lights are being proposed in any residential use especially in the rural sections of the county?
#7962	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	If it's a permitted use and requires lighting additional meetings should not be necessary. SPEX uses have additional public meeting requirements.
#7284	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE. B. METHOD OF MEASUREMENT. There is a typo here (and in the 1993 ZO). The reference should be to the "INTERNATIONAL Commission on Illumination", not to the "INTERNAL" Commission on Illumination. Regardless, the standards set forth by the International Dark- Sky Association ("IDA") and the Illuminating Engineering Society ("IES") should be used here as they are now the two leading organizations helping jurisdictions establish outdoor lighting standards to reduce the impacts of glare, light trespass, and light pollution, while still promoting safety and security as well as encouraging energy conservation.
#7963	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Typo corrected. See other replies to comments regarding dark sky standards which can be considered.

ID	Section
#7283	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE A. GENERAL REQUIREMENTS. Recommend that Staff consider the use of defined Zones that each District in the County be assigned. Lighting Zones are recommended by the Dark Sky Association. Implementing lighting zones will allow different amounts of light in areas with different nighttime characteristics. Zones can be defined based on ambient light levels, population density, and other community considerations. For example, the downtown Sterling area would require different standards for outdoor lighting than would a residential zone in Purcellville/ Hillsboro areas. The Model lighting Ordinance (“MLO”) developed by the International Dark-Sky Association (“IDA”) and the Illuminating Engineering Society (“IES”) provides examples of lighting zones that could be adopted/modified by Loudoun and delineated in the revised ZO. Each standard for specific use defined in Chapter 3 could then reference the applicable zone as defined in section 5.08.05. Copy of the MLO available here: https://loudouncoalition.org/wp-content/uploads/2022/01/MLO_FINAL_June2011.pdf
#7964	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Comments and suggestions acknowledged and will be considered.
#7282	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE. Once the revised ZO is completed and approved, the County should develop “cheat sheet” graphics detailing Loudoun’s lighting ordinance for residential and non-residential areas/districts. These graphics will provide an easy-to-follow guides with the rules for Loudoun citizens and businesses to follow, thus ensuring compliance with the regulations from the start. Samples of those developed and used by Fairfax County can be found here: https://loudouncoalition.org/wp-content/uploads/2022/01/FAIRFAX-Res-Non-Res-Lighting-Zoning-Regs.pdf
#7965	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Comments and suggestions acknowledged. Graphics are being considered for inclusion in many sections of the Ordinance for clarity and ease of application.
#7281	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc	5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE Reduce the enforcement aspect for zoning personnel by requiring that all applications for rezoning, building, electrical, sports illumination etc. be submitted with a lighting

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:1/16/2022</p>	<p>plan that addresses the revised standards that the County adopts with regard to lights, color temperature/glare. A photometric plan or a sports Illumination plan (depending on the nature of the application) prepared by a lighting professional should be required.</p>
#7966	7.05.02 Light and Glare
<p>By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022</p>	<p>Photometric plans are already a requirement when lighting is proposed to determine compliance with current standards and will continue to be a requirement.</p>
#7280	7.05.02 Light and Glare
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022</p>	<p>5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE Why isn't there a "DEFINITIONS" section here similar to that in other sections of the draft revised ZO? Recommend that Staff consider adding Definitions, as appropriate. The International Dark-Sky Association ("IDA") and the Illuminating Engineering Society ("IES") have jointly created a Model lighting Ordinance ("MLO") for local jurisdictions. This document contains numerous definitions that could be adopted and incorporated into the revised ZO. Copy of the MLO available here: https://loudouncoalition.org/wp-content/uploads/2022/01/MLO_FINAL_June2011.pdf</p>
#7968	7.05.02 Light and Glare
<p>By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022</p>	<p>Comments acknowledged and can be considered for inclusion. See comments elsewhere regarding dark sky.</p>
#7279	7.05.02 Light and Glare
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022</p>	<p>"5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE Recommend that Staff consider adding a clause that would address exceptions to the APPLICABILITY clause. The revised (March 2021) Fairfax County Ordinance, section 5109, provides examples of exceptions that Fairfax added to its ZO. Such exceptions used by Fairfax include, but are not limit to: lighting fixtures and standards required by the Federal Communications Commission, Federal Aviation Administration, Federal and State Occupational Safety and Health Administrations, or other federal, state, or county agencies, to include street lights within the public right-of-way. Routine lighting fixture maintenance, and Holiday lighting fixtures. section 5109 can be found here: https://online.encodeplus.com/regs/fairfaxcounty-va/doc-viewer.aspx?tocid=001.006.010#secid-255"</p>
#7967	7.05.02 Light and Glare

ID	Section
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Comment acknowledged.
#7278	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.05. PERFORMANCE STANDARDS. LIGHT & GLARE. Do the light and glare standards apply to seasonal commercial lighting? Do the light and glare standards apply to all vineyards, wineries, breweries? If not why not?
#7512	7.05.02 Light and Glare
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/19/2022	Please see response #5711 related to religious implications and definition of "seasonal"
#7277	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE Why isn't there an "APPLICABILITY" clause in this section similar to that in other places? Recommend that language be added that all outdoor lighting installed after the date of effect of the revised ZO shall comply with the revised requirements, which would include, but is not limited to, new lighting, replacement lighting, or any other lighting whether attached to structures, poles, the earth, or any other location, including lighting installed by any third party.
#7971	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	This can be addressed for consistency throughout the ordinance.
#7276	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.05 PERFORMANCE STANDARDS. LIGHT AND GLARE Why isn't there a "PURPOSE" clause in this section similar to that in other places? Recommend the following be added: The purpose of this section is to establish outdoor lighting standards to reduce the impacts of glare, light trespass, and light pollution; to promote safety and security; and to encourage energy conservation.

ID	Section
#7516	7.05.02 Light and Glare
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/19/2022	Earthborn Vibration, Stone Quarrying, Noise, Light and Glare are all Performance Standards under Section 5.08. The purpose statement for performance standards is in Section 5.08.01. We can consider adding your suggestion to the purpose statement there if recommended.
#7275	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.08.05. PERFORMANCE STANDARDS. LIGHTING: Throughout section 5.08.05 athletic facilities seem to receive exemptions from some of the regulations when these exemptions have been known to negatively impact area citizens. These issues are normally created by having an athletic facility too near residents property. The way this section reads, an athletic facility could be directly adjacent to a residence and this would lead to a real issue for a resident. Comments?
#7972	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	lighting at athletic facilities are addressed by Use specific standards.
#7274	7.05.02 Light and Glare
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.08.05. PERFORMANCE STANDARDS. LIGHTING. Where are the zoning regulations to comply with Dark Sky requirements as outlined in the 2019 Comprehensive Plans?
#7973	7.05.02 Light and Glare
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	As noted in previous comments regarding dark sky, references in GP are acknowledged and additional evaluation of the referenced material is needed to determine if revisions are appropriate.
#7237	7.05.02 Light and Glare
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	Lighting D.2. Align lighting hours with outdoor music hours: until 9:00 PM most days, 11:00 PM Fridays and Saturdays.

ID	Section
#7515	7.05.02 Light and Glare
<p>By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/19/2022</p>	<p>Lighting hours will ultimately be dictated by the specific hours of operations for 5-600 uses, since we likely cannot legally allow hours of operations for a use and require that they shut off their lights while legally operating. In other words, there will need to be alignment between hours of lighting, noise, and operation for 5-600 uses that will need to be set according to the hours of operation. We are open to considering recommendations regarding the hours of operation for uses with significant impacts.</p>
#11008	7.05.01 Purpose and Applicability
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"5.08.01 PURPOSE, APPLICABILITY, EXCEPTIONS AND ADMINISTRATION Have any penalties for violations been revised or increased from the R93Zoning Ordinance, or will they be identical when Chapter 7 is released for draft text review? If they are not revised, then what has all the focused input, case studies and complaints in LEx since 2020 been used for? Staff Response: The methods to address violations are included in the Zoning Administrator's duties which are spelled out in Chapter 10 and are currently under development. An increase in penalties is not expected but yet to be determined" STATUS?"</p>
#11002	7.05.01 Purpose and Applicability
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"5.08.01.C PERFORMANCE STANDARDS, APPLICABILITY. If the 5.08.01. A question is correct, then the requirement is inconsistent and directly contrary for 5.08.01.C, Agricultural Uses, as applied to high-intensity uses that are not bonafide agricultural operations, ""lawful"" or not. Staff Response: The need for further clarification of ""farm"" in the concern for exemption of agricultural uses/operations has been raised often and will be evaluated holistically to determine any needed revision. Since a revision and an appropriate location haven't been identified yet cannot determine a schedule for additional review 2022 Round 3 Input: There is a need to further clarify agricultural operations, define a ""farm,"" and not permit all uses to equally be exempted when they are know to have high-intensity impacts (traffic, noise, parking, etc.). When will this be included in the next draft text?"</p>
#11001	7.05.01 Purpose and Applicability
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"5.08.01.C: PERFORMANCE STANDARDS. AGRICULTURAL OPERATIONS. 2022 Round 3 Input: This regulation now requires the definition of ""Agricultural Operation"" to be included in Chapter 11, Definitions, as one does not appear in Chapter 11. Such a definition must be compliant/compatible with Code of Virginia § 3.2-300. Definitions. -- ""Agricultural operation"" means any operation devoted to the bona fide production of crops, or animals, or fowl including the production of fruits and vegetables of all kinds; meat, dairy, and poultry products; nuts, tobacco, nursery, and floral products; and the production and harvest of products from silviculture activity.</p>

ID	Section
	<p>-- ""Production agriculture and silviculture"" means the bona fide production or harvesting of agricultural or silvicultural products but shall not include the processing of agricultural or silvicultural products or the above ground application or storage of sewage sludge. Definition of ""Agricultural Operations"" should also be CONSISTENT with description in Ch 4, MDOD 4.04: ""Agricultural Operations. Agricultural, horticultural, or animal husbandry operations located in the MDOD that are covered by, and conducted in conformance with, a Conservation Farm Plan, that includes best management practices, approved by the Loudoun County Soil and Water Conservation District or the U.S. Natural Resources and Conservation Service, and a Nutrient Management Plan approved by the Loudoun County Soil and Water Conservation District. Structures associated with agricultural operations are subject to all regulations in Section 4.04."" "</p>
#11000	7.05.01 Purpose and Applicability
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"5.08.01.C: PERFORMANCE STANDARDS. This section states that the regulations contained in the Performance Standards area do not apply to Agricultural Operations. Staff Response: Changed ""uses"" to ""operations"" as many uses may fall under the definition of ""agricultural use"" but ""agricultural operations"" are different and defined differently. This will need to be further vetted by the CAO and therefore marked for follow-up 2022 Round 3 Input: Language should define ""Ag Operations"" and consider change to bonafide production agricultural operations rather than agricultural which is too broad a term. This exception should not apply to the tasting room or other retail operations. Only the bona fide agricultural operation portion of the business and property should be included in 5.08.01.C. as an exception to noise and lighting standards."</p>
#10994	7.05.01 Purpose and Applicability
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"5.08.01.C: PERFORMANCE STANDARDS. AGRICULTURAL OPERATIONS. 2022 Round 3 Input: This regulation now requires the definition of ""Agricultural Operation"" to be included in Chapter 11, Definitions, as one does not appear in Chapter 11. Such a definition must be compliant/compatible with Code of Virginia § 3.2-300. Definitions. -- ""Agricultural operation"" means any operation devoted to the bona fide production of crops, or animals, or fowl including the production of fruits and vegetables of all kinds; meat, dairy, and poultry products; nuts, tobacco, nursery, and floral products; and the production and harvest of products from silviculture activity. -- ""Production agriculture and silviculture"" means the bona fide production or harvesting of agricultural or silvicultural products but shall not include the processing of agricultural or silvicultural products or the above ground application or storage of sewage sludge. Definition of ""Agricultural Operations"" should also be CONSISTENT with description in Ch 4, MDOD 4.04: ""Agricultural Operations. Agricultural, horticultural, or animal husbandry operations located in the MDOD that are covered by, and conducted in conformance with, a Conservation Farm Plan, that includes best management practices, approved by the Loudoun County Soil and Water Conservation District or the U.S. Natural Resources and Conservation Service, and a Nutrient Management Plan approved by the Loudoun County Soil</p>

ID	Section
	and Water Conservation District. Structures associated with agricultural operations are subject to all regulations in Section 4.04." " "
#9263	7.05.01 Purpose and Applicability
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.08.01C: This should be tightened to exclude "production agricultural" uses. Simply stating agricultural uses is too broad.
#9968	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:5/11/2022	Receiving additional attention regarding the definition of agricultural operations
#8183	7.05.01 Purpose and Applicability
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:2/3/2022	5.08.01.D.1. Are zoning permits required for by-right uses? Where is "zoning permit" defined? (enCode doesn't permit me to look back at some chapters, or forward to Definitions.)
#9969	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:5/11/2022	Zoning Permits are required for by-right uses. Zoning Permit is defined in Chapter 11 and the procedures are contained in 7.03.
#7704	7.05.01 Purpose and Applicability
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/24/2022	E.1.b What does this mean? Does it mean, if the County cannot measure the complaint easily, it will not enforce the regulations?
#7944	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	No it means (as further provided in the reg) that if the County is reasonably certain there is a violation without measurement it will indicate that to the violator and provide an opportunity for correction. If there is no action for correction then the County will hire the experts needed to perform the measurement. If the measurement indicates a violation then the violator will have another chance to correct and be responsible for the costs of the expert measurer. If the measurement shows that the County was incorrect and there is no violation, the the county will pay the costs.

ID	Section
#7701	7.05.01 Purpose and Applicability
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/24/2022	D.1. Perhaps this paragraph should be amended to more clearly state what "At the discretion of..." means. To me if a use will be intensive in some way, then the ZA would want a,b,c & d to be fulfilled to ensure the intent of this section of the ordinance is met. This section should not be used to require unnecessary paperwork for non-intensive uses.
#7945	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	It means the ZA can use judgement to decide what is needed (among the items listed) to make a defensible determination that the standards will be met.
#7668	7.05.01 Purpose and Applicability
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	E. 2 and 3. These sections seem like they could provide a better mechanism for addressing certain development violations in a timely manner than is possible today because performance standards are lacking, but I may be reading too much into it. Staff discussion and CAO perspectives would be helpful.
#8033	7.05.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	We will need to follow up on those perspectives.
#9970	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:5/11/2022	This section has been moved to 7.13 to be included with Procedures.
#7667	7.05.01 Purpose and Applicability
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	D. Administration of Performance Standards.1. Zoning Permit Procedure. This section seems very appropriate for the inclusion of environmental data and certification requirements for site regulations. One example that could/should be addressed (and hasn't yet) is maximum impervious cover standards for different types of development. The goal is to provide quantifiable standards that are not subjective, yet flexible and preserve property rights while also preserving important environmental and historic features through better site design.

ID	Section
#8034	7.05.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Agree with that example. Is it possible to obtain other specific suggestions?
#7666	7.05.01 Purpose and Applicability
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	D. Administration of Performance Standards. 1. Zoning Permit Procedure As a follow-on to my question at the start of this section, when I read this part, it seems more appropriate to place the environmental suggestions that I made under development standards, here instead of there, particularly because of the enforcement of performance standards section. What are the pros and cons, or appropriateness of placement in one section versus the other?
#9972	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:5/11/2022	Both sections are process rather than standards and have been moved to Chapter 7 Procedures
#7529	7.05.01 Purpose and Applicability
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:1/20/2022	3.b. If the violation requires complex or precise measurements will the ZA be able to determine compliance without conducting those measurements as 3.b. suggests? Can you offer an example?
#7565	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/21/2022	Determination of compliance is highly dependent upon the specific situation. However, as an example, if light trespass onto another property is alleged, it may be obvious that it occurs but require specialized equipment to measure the degree. If the violator removes the offending light it will also be obvious that the violation has been corrected and not need to be measured. Not every violation can be addressed in this manner.
#7267	7.05.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.08.01.E. PERFORMANCE STANDARDS. ENFORCEMENT. Violations: The explanation of how violations will be handled appeared to address the administration of violations appropriately. The action verb 'must' appears in most of the actions which assures some type of action will be taken. The section does not provide any indication of how violations are discovered, reported or recorded. Will that all be detailed in Chapter 7, and if so, when and how will comments be received in time for that chapter?

ID	Section
#7567	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/21/2022	Chapter 7 is devoted to review processes and still under development so the question of "how violations are discovered, reported or recorded" cannot be fully addressed at this time although the concern for that is now noted and recorded. Staff and process is committed to providing ZOC the opportunity to review and comment on all Chapters of the ZOR.
#7266	7.05.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	<p>"5.08.01.D.1. & 2 PERFORMANCE STANDARDS. ZONING PERMIT PROCEDURE. 1.b asked for ""a description of the activity to be conducted regarding waste products, external effects or other conditions which are regulated."" ""External effects"" required is too nebulous. There is sufficient history to now require more detailed information on the permit including, but not limited to, estimated traffic, parking totals, events, water usage, etc. and 2. indicates ""all information and evidence submitted . . . must constitute a certification and an agreement on the part of the applicant . . . ""</p> <p>How is veracity determined? There are numerous cases where the original permit description of use was falsified (flipped to another use after approval). What are the consequences for such a flip other than a response from Staff of, ""Oops, let's help you fix that?"" "</p>
#7691	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/24/2022	Will need to consult with other permit issuing participants to determine an appropriate revision if necessary. Often a site plan will be on record with this information. Veracity- submitted information has to be assumed to be accurate absent indicators otherwise. The distinction between a legitimate change in use and falsified information has to be dealt with case by case.
#7265	7.05.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.08.01.d.1: PERFORMANCE STANDARDS. This section describes what data that is required for a zoning permit, i.e. in very general terms the data that the County needs in order to complete their review. However, at the end of the section a sentence says a plot plan "may" be required. By changing the 'may' to a 'shall' the county would assure receiving much of the basic data they need and avoid going back to ask for more. Also, by requiring a plot plan with verified data, many of the issues with a zoning permit could be avoided.
#7481	7.05.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	Agree. Reworded to still allow the Zoning Administrator's discretion, but replaced "may" with "must." Therefore it places the decision on the ZA to accept less, or an alternative, versus the ambiguity of an applicant reading the previous text.

ID	Section
#7264	7.05.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.01.C: PERFORMANCE STANDARDS. This section states that the regulations contained in the Performance Standards area do not apply to Agricultural Uses. A sentence should be added to refer people to the section that does apply to Performance Standards in the rural area. This clause also seems to conflict or cause confusion with section 5.08.04.D where rural economy uses have a noise limit implied.
#7482	7.05.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/18/2022	Changed "uses" to "operations" as many uses may fall under the definition of "agricultural use" but "agricultural operations" are different and defined differently. This will need to be further vetted by the CAO and therefore marked for follow-up.
#7263	7.05.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.01.C. PERFORMANCE STANDARDS - AGRICULTURAL USES. Given the stated purpose of the Performance Standards to protect the community from dangerous, injurious or noxious activity and conditions, why are lawful agricultural operations given a blanket exemption? Why doesn't the community need protection from dangerous, injurious, or noxious activity that originates in an agricultural facility?
#7488	7.05.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/18/2022	This has been done to ensure the County is following Code of Virginia 15.2-2288.6. Agricultural operations; local regulation of certain activities. However, there is the caveat "unless there is a substantial impact on the health, safety, or general welfare of the public." Therefore, we will request the CAO provide further insight.
#7262	7.05.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	"5.08.01.C PERFORMANCE STANDARDS, APPLICABILITY. If the 5.08.01.A question is correct, then the requirement is inconsistent and directly contrary for 5.08.01.C, Agricultural Uses, as applied to high-intensity uses that are not bona fide agricultural operations, ""lawful"" or not. This is exactly why there is a need to further clarify agricultural operations, define a ""farm,"" and not permit all uses to equally be exempted when they are know to have high-intensity impacts (traffic, noise, parking, etc.). When will this be included in draft text for review?"
#7692	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff	The need for further clarification of "farm" in the concern for exemption of agricultural uses/operations has been raised often and will be evaluated

ID	Section
steve.goodrich@loudoun.gov Date: 1/24/2022	holistically to determine any needed revision. Since a revision and an appropriate location haven't been identified yet cannot determine a schedule for additional review.
#7261	7.05.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.01.A. PERFORMANCE STANDARDS, APPLICABILITY. Confirm: the statement that, "1. All permitted and special exception uses, whether such uses are permitted as a principle use or an accessory use, must operate in conformance with the performance standards set forth in this Chapter" applies to ANY AND ALL uses listed in the Chapter 3 use tables, and not only those uses with additional specifications under Use-Specific Standards, correct?
#7534	7.05.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/20/2022	Agreed. Language added to A.1 to reference Use Tables.
#7260	7.05.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.01 PURPOSE, APPLICABILITY, EXCEPTIONS AND ADMINISTRATION Have any penalties for violations been revised or increased from the R93Zoning Ordinance, or will they be identical when Chapter 7 is released for draft text review? If they are not revised, then what has all the focused input, case studies and complaints in LEx since 2020 been used for?
#7693	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/24/2022	The methods to address violations are included in the Zoning Administrator's duties which are spelled out in Chapter 10 and are currently under development. An increase in penalties is not expected but yet to be determined.
#7259	7.05.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/16/2022	5.08.01 PERFORMANCE STANDARDS. PURPOSE. Add the same bullet as 5.04 Open Space, 5.09 Adaptive Reuse, and 5.10 Homeowner's Association Standards: "Promote the public health, safety and welfare."
#7535	7.05.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov	Initial statement revised.

ID	Section
Date:1/20/2022	
#7258	7.05.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	"5.08. PERFORMANCE STANDARDS. Direct quotation from citizen: Perusal of what Staff has for Lights shows they apparently didn't even read what was sent over in Rounds 1 & 2. Not much has changed from the existing regs -- right down to still leaving incorrect references to organizations. Why have we done all this work over the past two years with so little input being used? "
#7536	7.05.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/20/2022	Noted. Staff requests more specificity.
#9974	7.05.01 Purpose and Applicability
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:5/11/2022	Substantial change has occurred since the original comment was made and there will be additional discussion with PC regarding GP reference to Dark Sky before a final draft is prepared.
#7231	7.05.01 Purpose and Applicability
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	A.1. Better language: "All permitted uses (included uses approved by special or minor exceptions)..."
#7537	7.05.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/20/2022	Language retained but we will seek the guidance of the CAO. Special exception and minor special exception uses are not "permitted" uses.
#7230	7.05.01 Purpose and Applicability
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	5.08.02.c. IMPORTANT. Do breweries and wineries qualify for this exemption from performance standards? These are active uses in the RPA and they will focus on how performance standards apply to them. The ZOR needs to make this clear one way or the other.
#7566	7.05.01 Purpose and Applicability

ID	Section
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/21/2022	It's likley the reference/question applies to 5.08.01C rather than 5.08.02.c. Since "agricultural operations" is not a defined term and wineries and breweries could include some that are considered agricultural and some that are not, this section may need further evaluation and/or expanded or clarifying language to insure only true agricultural operations are included as intended to be exempt.
#7665	7.05 Light, Noise, and Vibration
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	General question: I've made several suggestions in the development standards section for environmental requirements. Are those more appropriate in this section (with alterations to the purpose), or does it matter whether they are in development versus performance standards, as long as they are universally applicable for by-right as well as all other types of legislative applications?
#8031	7.05 Light, Noise, and Vibration
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	It doesn't matter. As we go through and make revisions, we will figure out where additional items fit. Thanks
#6989	7.04.08 Waivers and Modifications
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/5/2022	Administrative waivers allowed for "buffer yards"; Legislative for "Road Corridor setbacks". Chance for mis-interpretation that Road corridor buffers (plantings) are also only available to be modified legislatively. It should be clarified that Road Corridor Buffers & Buffer yards can be modified administratively.
#7831	7.04.08 Waivers and Modifications
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Understand question. Will consult with zoning staff who drafted the initial ordinance, but is currently not available, to determine whether the intent is to allow road corridor buffers to be modified as well.
#6975	7.04.08 Waivers and Modifications
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	b.2. Design Exhibit. Editorial suggestion-use "When" instead of "For."
#13781	7.04.07 General Landscape Provisions
By: Gem Bingol/PEC Tags: zoc	B.2.e Include "native" prior to "ornamental grasses and/or perennials".

ID	Section
gbingol@pecva.org Date:7/18/2022	
#13778	7.04.07 General Landscape Provisions
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.07.07.B. Add to plant unit requirements that 80% native plants should be required and reference to flowering plants should be adjusted to recognize host plants as well as pollinator needs (as part mapping and ranking the value of the ecological function of native plants). For lists of Native Plants, refer to VADCR native plant list, Digital Atlas of the Virginia Flora, The Wildflower Center and the United States Department of Agriculture
#13773	7.04.07 General Landscape Provisions
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.07.07.A. Native grasses and perennials should be used on slopes and other hard-to-maintain areas and medians, while ensuring needed sight distances.
#7634	7.04.07 General Landscape Provisions
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/21/2022	These suggestions include references to overall landscape plans with more specific performance standards related to the needs of pollinator species. B. Plant Type Requirements. Plant types and composition in Landscape Plans, all Buffer yards and Road Corridor Buffers must support ecosystem function and provide pollinator habitat, in addition to visual aesthetics, buffering and screening. Plant units must be provided as follows: 1. A minimum of 80% must consist of native species as specified in the Facilities Standards Manual, and; 2. A minimum of 50% of large deciduous trees, small deciduous trees and shrubs must be identified as host species specified in the Facilities Standards Manual, for Lepidoptera (butterfly and moth) larvae that require the leaves of these woody species to complete their life cycle. 3. A minimum of 50% of the small deciduous trees, shrubs and herbaceous plants provided must produce nectar and pollen from conspicuous flowers across a variety of seasons during the year. 4.The following requirements apply to the plant types used to meet the Plant Unit requirements for each Buffer Yard or Road Corridor Buffer: (renumber and use text for previous #1, 2, 3, 4, 5, 6, 8. Delete previous #7 as it's covered in the new suggestions for #1, 2 and 3).
#7818	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with County Urban Forester and Community Planning Staff about requiring pollinator and native species and include requirements accordingly.
#8662	7.04.07 General Landscape Provisions

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the pollinator habitat requirement is in the FSM. NRT is anticipating an update to the FSM to address pollinator habitat policies of the 2019 GP as a companion to the ZO Rewrite. Until this time, this requirement will apply.
#7633	7.04.07 General Landscape Provisions
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/21/2022	B. Plant Unit Requirements. Although these guidelines were previously discussed for buffer yards and road corridor buffers, I may have missed, but don't see any requirements for general landscaping plans. Ecosystem benefits are an essential purpose of landscape plans, so this section should be revised to include requirements related to the ecological function and value of vegetation, as well as purely aesthetic, screening and buffering values. I'd suggest that this can be addressed at least in part, by changes to plant unit requirements (in follow-on comments).
#7820	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with County Urban Forester, Zoning, and Community Planning Staff about general landscape plan requirements include regulations accordingly.
#8678	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/18/2022	The landscape plan requirements in this section are only for the buffers and parking lot landscaping. The draft ZO has incorporated more requirements for open space and natural areas such as the River and Stream Corridor Resources. In consultation with NRT, they indicated that leaving more areas in natural "messy" state is better than requiring additional landscaped areas.
#7227	7.04.07 General Landscape Provisions
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	5.07.07 One goal should be for new residential lots to have a minimum tree cover within, say, 15 years. That cover may include existing vegetation. A critical purpose of this requirement is for new projects on previously-pastured land, to end up looking naturalized rather than blemish-like.
#7817	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Canopy requirements (minimum tree cover) are addressed in Section 5.06 and are limited in scope by the enabling legislation of § 15.2-961 of the Code of Virginia. In a separate response in this page, we note we will evaluate canopy requirement for rural districts.
#6974	7.04.07 General Landscape Provisions

ID	Section
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	A.1. Landscape Plan. Suggest adding a requirement that landscaping plans be designed by a certified Chesapeake Bay Landscape Professional and follow those guidelines in the design. See https://cblpro.org/
#7819	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with County Urban Forester and Community Planning Staff about recommendation and include requirements accordingly.
#8679	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/18/2022	Consulted with NRT. They indicated that this certification is largely related to localities subject to Chesapeake Bay regulations and to contractors and installers. Also, there are currently only 3 certified professionals in Loudoun County. Therefore, they did not find it a relevant requirement.
#6973	7.04.07 General Landscape Provisions
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:1/5/2022	A. Landscape Plan. Suggest requiring the installation of native grasses and other appropriate native plants in areas that are difficult to mow in order (i.e slopes, wet areas and medians) instead of non-native turf to reduce energy use and maintenance costs for the property owner and increase biodiversity.
#7821	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with County Urban Forester and Community Planning Staff about requiring native plantings and include requirements accordingly.
#8685	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/18/2022	Slope stabilization and wetland areas are addressed in the VA erosion and sediment control handbook which is referenced in the FSM. We are reducing duplicative requirements in the ZO that could possibly contradict what the VA E&S Handbook would require. Other areas suggested (medians) would not be subject to the landscape plan in this section, which address buffers and parking lot landscaping only.
#6972	7.04.07 General Landscape Provisions
By: Gem Bingol Tags: zoc gbingol@pecva.org	A. Landscape Plan. Suggest requiring the inclusion of green infrastructure/LID BMPs to manage stormwater runoff. . The county generally requires only one

ID	Section
Date:1/5/2022	such BMP, but to offset the impacts of and reduce stormwater impacts of development, these BMPs should be standard practice.
#7823	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with SWM staff about LID requirements and include additional regulations accordingly.
#8774	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/22/2022	Consulted with SWM staff - the preference is to allow flexibility, also not all sites may be conducive. Also, BOS direction is to not exceed state code requirements. Therefore did not include.
#6971	7.04.07 General Landscape Provisions
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	B. Plant Unit Requirements 7c. Suggest amending this to recognize that the essential feature that pollinators need is that the plants are native species. They also need native large canopy trees and herbaceous plants to complete their full life cycles.
#7822	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with County Urban Forester and Community Planning Staff about requiring pollinator and native species and include requirements accordingly.
#8661	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the pollinator habitat requirement is in the FSM. NRT is anticipating an update to the FSM to address pollinator habitat policies of the 2019 GP as a companion to the ZO Rewrite. Until this time, this requirement will apply.
#6970	7.04.07 General Landscape Provisions
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	Plant Unit Requirements 7b. Suggest upping the minimum percentage of native species to 80% to support pollinator habitat and biodiversity of other native species.
#7824	7.04.07 General Landscape Provisions

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with County Urban Forester and Community Planning Staff about requiring pollinator and native species and include requirements accordingly.
#8660	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species % requirement is in the FSM. NRT is anticipating an update to the FSM to address native species policies of the 2019 GP as a companion to the ZO Rewrite. In addition, the Urban Forester noted that increasingly they see more native species in landscape palettes.
#6969	7.04.07 General Landscape Provisions
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	B. Plant Unit Requirements. Suggest adding requirements to prohibit the use of invasive non-native tree, shrub or herbaceous plants.
#7825	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with County Urban Forester about precluding species and include requirements accordingly.
#8659	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022	FSM plant list was recently updated to remove invasive species from the permitted plant list. The intent is to periodically review and update this list on an ongoing basis.
#6892	7.04.07 General Landscape Provisions
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.07.E GENERAL LANDSCAPE PROVISIONS. Maintenance. Different pollinators need access to food throughout the growing season from April through October, and many overwinter in stems. Should language be added limit disturbances to overwintering pollinators? This could includes restrictions on when mowing could occur, or the minimum height of stems to allow overwintering pollinators homes.
#7827	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with County Urban Forester and Community Planning Staff about requiring pollinator and native species and their maintenance and include requirements accordingly.

ID	Section
#8658	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 2/16/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the pollinator habitat requirement is in the FSM. NRT is anticipating an update to the FSM to address pollinator habitat policies of the 2019 GP as a companion to the ZO Rewrite. Until this time, this requirement will apply.
#6891	7.04.07 General Landscape Provisions
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.07.07.C.1 GENERAL LANDSCAPE PROVISIONS. Use of Buffers. Should passive recreation trails include references and/or requirements to comply with the LPAT Framework Plan design standards? How is the LPAT Framework Plan being utilized to incorporate into buffer requirements?
#7826	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/25/2022	This regulation only indicates that a trail, required or not, is allowed in a buffer if the plantings can be accommodated.
#6890	7.04.07 General Landscape Provisions
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.07.07.B.7 GENERAL LANDSCAPE PROVISIONS. Why is the percentage of native species only 50%? To truly support pollinator habitat, that percentage should be higher, if not 100%.
#7828	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/25/2022	Will consult with County Urban Forester and Community Planning Staff about pollinator requirements and include requirements accordingly.
#8657	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 2/16/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species % requirement is in the FSM. NRT is anticipating an update to the FSM to address native species policies of the 2019 GP as a companion to the ZO Rewrite. Until this time, this requirement will apply to all buffers. In addition, the Urban Forester noted that increasingly they see more native species in landscape palettes.
#6889	7.04.07 General Landscape Provisions

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.07.B GENERAL LANDSCAPE PROVISIONS. Plant Unit Requirements. Should these buffers take into account existing vegetation on neighboring lots to create contiguous habitat between lots as part of the buffers?
#7829	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	No, because the buffer is required on the lot with the use, not the neighboring lot. This buffer would be in addition to vegetation on the neighboring lot.
#6872	7.04.07 General Landscape Provisions
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07. LANDSCAPING: D. 3 - Could this be strengthened by recommending using native species wherever possible?
#7830	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with County Urban Forester and Community Planning Staff about requiring native species and include requirements accordingly.
#8656	7.04.07 General Landscape Provisions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species % requirement is in the FSM. NRT is anticipating an update to the FSM to address native species policies of the 2019 GP as a companion to the ZO Rewrite. In addition, the Urban Forester noted that increasingly they see more native species in landscape palettes. Moreover, all buffers must meet pollinator habitat that requires 50% native species.
#6833	7.04.07 General Landscape Provisions
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	D.2.a should specify the height at which caliper is measured. I suggest a 3" caliper requirement. A 1" caliper just gets you skinny stalks.
#6943	7.04.07 General Landscape Provisions
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov	Our subject matter experts preferred 1" caliper for their ability to acclimate, wider species variety commercially available, and a higher survival rate.

ID	Section
Date:1/4/2022	
#13756	7.04.06 Parking Area Landscaping and Screening Requirements
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.07.06.A. Include bioretention in parking lot landscaping requirements.
#6968	7.04.06 Parking Area Landscaping and Screening Requirements
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	Parking lot islands should be required to have curb cuts and depressions to allow stormwater infiltration and facilitate low impact/green infrastructure elements to be incorporated into the parking lot design to reduce the impacts of impervious cover and reduce stormwater runoff.
#7813	7.04.06 Parking Area Landscaping and Screening Requirements
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with SWM staff and confirm appropriate requirements and locations for them and revise accordingly.
#8702	7.04.06 Parking Area Landscaping and Screening Requirements
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/22/2022	Discussed recommendation with SWM staff. For practicality and flexibility purposes, we did not include the requirement to provide LIDs in parking lot landscaping, as it may not always be appropriate. Native species requirement recommendation addressed in response to other comments.
#6967	7.04.06 Parking Area Landscaping and Screening Requirements
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:1/5/2022	Parking lot landscaping requirements should include green infrastructure/low impact development features such as bioswales, rain gardens or other facility to provide stormwater infiltration and management capability, utilizing a minimum percentage (80%) of native plant materials.
#7814	7.04.06 Parking Area Landscaping and Screening Requirements
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with SWM staff and confirm appropriate requirements and locations for them and revise accordingly.
#8701	7.04.06 Parking Area Landscaping and Screening Requirements

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/22/2022	Discussed recommendation with SWM staff. For practicality and flexibility purposes, we did not include the requirement to provide LIDs in parking lot landscaping, as it may not always be appropriate. Native species requirement recommendation addressed in response to other comments.
#6888	7.04.06 Parking Area Landscaping and Screening Requirements
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.06 PARKING AREA LANDSCAPING AND SCREENING REQUIREMENTS. As part of 2019 General Plan FTV Policy 4 Strategy 4.2, should this section include more tree canopy to reduce the heat island effect?
#7816	7.04.06 Parking Area Landscaping and Screening Requirements
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Will consult with County Urban Forester about appropriateness and survivability of requiring additional large canopy trees in parking lots and revise accordingly.
#8677	7.04.06 Parking Area Landscaping and Screening Requirements
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/18/2022	Added min. 15% req for small deciduous trees resulting in 90% canopy requirement.
#6887	7.04.06 Parking Area Landscaping and Screening Requirements
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.06 PARKING AREA LANDSCAPING AND SCREENING REQUIREMENTS. Should this section include language in regards to 2019 General Plan CE Policy 7 Strategy 7.3 to prevent light pollution?
#7815	7.04.06 Parking Area Landscaping and Screening Requirements
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Light and glare performance standards are located under Section 5.08.05. Parking lot lighting will be required to meet them.
#6832	7.04.06 Parking Area Landscaping and Screening Requirements
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	1.b.4. A "large deciduous tree" as of now, or at 20 years, or at maturity? Perhaps the entire ZO needs review by an outsider to correct spelling, grammar, specificity, vagueness, etc.

ID	Section
#6942	7.04.06 Parking Area Landscaping and Screening Requirements
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	We haven't linked the definitions yet, but here is the definition for Tree, Large Deciduous: A deciduous tree, usually single trunked, with a definitely formed crown of foliage and which attains a mature height of at least 30 feet. Preferred species are provided in the Facilities Standards Manual.
#6886	7.04.05 Screening of Certain On-site Components
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.05 SCREENING OF CERTAIN ON-SITE FUNCTIONS: Does this section provide for the screening of illegal landfills, stockpiles of dirt or "personal recreational fields" from neighboring properties? The Gable landfill rises more than 30 feet at the top of the Watershed over 18 acres but has no screen or buffer. If loading areas, dumpsters, outdoor storage areas etc. are required to be screened from neighboring properties, surely illegal landfills, stockpiles of dirt and "personal recreational fields" should be screened.
#7812	7.04.05 Screening of Certain On-site Components
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	This section is only to address unsightly functions on a site that are part of a use, such as the mechanical equipment or dumpsters, it is not for screening uses, which is addressed in Section 5.07.03.
#6830	7.04.05 Screening of Certain On-site Components
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	?????? This screening should not apply to residences, farms, etc. Please define to which uses these requirements apply.
#6941	7.04.05 Screening of Certain On-site Components
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Staff will review and ensure that this standard does not reach into unintended uses. Marked for follow-up.
#13752	7.04.04 Cemetery, Burial Ground, and Grave Buffer
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.07.04 D and E. It looks like E. only covers off-site cemeteries from putting protection or preservation buffers on individual residential or non-residential lots. Does D. also cover this possibility? I'm confused by the wording, but want to be sure that it does.
#13743	7.04.04 Cemetery, Burial Ground, and Grave Buffer

ID	Section
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.07.04.B.2.d. Typo--reinternment should be reinterment
#7580	7.04.04 Cemetery, Burial Ground, and Grave Buffer
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/21/2022	To clarify my earlier comment about keeping protection and preservation buffers off individual development lots, I meant new residential lots being developed around an existing cemetery, to preserve the buffers as intended. This will preclude conflicts with a private homeowner's property management and avoid enforcement challenges.
#8028	7.04.04 Cemetery, Burial Ground, and Grave Buffer
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	We'll follow up on this.
#7012	7.04.04 Cemetery, Burial Ground, and Grave Buffer
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/7/2022	5.07.04.A.1.c. Should be clarified to indicate that the buffer is not required on the grounds of the church, but would be required on an adjacent developing property.
#8029	7.04.04 Cemetery, Burial Ground, and Grave Buffer
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Noted and marked for follow up during revisions.
#6966	7.04.04 Cemetery, Burial Ground, and Grave Buffer
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	There is no stipulation to prevent Protection Buffers and Preservation Buffers from extending onto adjacent individual development lots. This should not be allowed.
#7809	7.04.04 Cemetery, Burial Ground, and Grave Buffer
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/25/2022	Comprehend issue. Will consult with staff that previously drafted this section, determine approach, and revise accordingly.

ID	Section
#7577	7.04.03 Buffer Yards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/21/2022	A. General Provisions. 7.Instead of "may be used" substitute "are encouraged to be used"
#7798	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Allowing their use is encouragement. Landscaping is expensive. Applicants use this provision often to meet requirements.
#7356	7.04.03 Buffer Yards
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:1/17/2022	Table 5.07.03-1 - Type "C" buffers as defined are insufficient to buffer 70ft tall data centers.
#7799	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	A Type C provides the most screening. Screening primarily protects views at ground level. We cannot screen tall things such as monopoles or tall buildings.
#7355	7.04.03 Buffer Yards
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:1/17/2022	Table 5.07.03-1 why are buffer yards reduced to type "B" when the proposed use is residential and Flex industrial is the adjacent use? When industrial/Flex industrial is the proposed use buffer type "C" is required when residential is an adjacent use. Suggest they both be Type C.
#7800	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	The most intensive use provides more screening than the lesser intensive use since the more intensive use is creating the greater impacts.
#7235	7.04.03 Buffer Yards
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	5.07.03-1. What buffers, if any, are required for wineries and breweries?

ID	Section
#7801	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	The Landscaping, Buffer Yard, and Screening requirements were recently adopted; therefore, buffer yard type requirements have not been revised with this draft and the buffer yards requirements for wineries and breweries remain the same. See also Section 5.07.03.A.6
#7011	7.04.03 Buffer Yards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/7/2022	Table 5.07.03-2 footnote 1 directs us to a non-existing table 5.07.06 for plant units.
#7013	7.04.03 Buffer Yards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/7/2022	Footnote 1 in Table 5.07.03-2 should refer to Table 5.07.07-1
#6965	7.04.03 Buffer Yards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	A lot of time and discussion went into the Use Buffer Yard Matrix Table, and I don't suggest revisiting it extensively, but would suggest reconsidering the value of buffers between like uses. These would provide habitat connections/corridors when planted with native plant materials. Creating more habitat linkages through buffer yards and general landscaping is essential if other species are to thrive.
#7802	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Noted. Staff will contemplate this suggestion. Mark for follow-up.
#8584	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/15/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). Buffers are not the opportune place to focus on establishing habitat due to their highly landscaped nature. In addition to buffer requirements, there are new open space and natural resource protection requirements that protect "messy" spaces that serve this purpose better. Therefore, we did not increase buffer requirements between like uses.
#6885	7.04.03 Buffer Yards

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.07.03.A.9 BUFFER YARDS. General Provisions. This section has the same circular logic of vegetative materials meeting specifications of the FSM. As noted previously, does this need to be updated to include greater provisions to comply with new 2019 General Plan policies in regards to native plants, pollinator habitat, and removal of invasives that have not been updated in the FSM yet?
#7803	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/24/2022	Will consult with County Urban Forester and determine best location/way to address removing invasive species and requiring native species and revise appropriately.
#8663	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 2/16/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species %, invasives, and pollinator requirements is in the FSM. NRT is anticipating an update to the FSM to address related policies of the 2019 GP as a companion to the ZO Rewrite. In addition, the Urban Forester noted that increasingly they see more native species in landscape palettes.
#6884	7.04.03 Buffer Yards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.07.03.A.7 BUFFER YARDS. General Provisions. Should this read "existing native vegetation and native trees" rather than just existing vegetation and trees?
#7806	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/24/2022	Will confirm with County Urban Forester, but I believe the FSM limits the trees that can be used to count toward buffer requirements and does not include invasive species.
#6883	7.04.03 Buffer Yards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.07.03.A.7 BUFFER YARDS, GENERAL PROVISIONS: Shouldn't the County emphasize native and non-invasive vegetation? Change to: "Existing native and non-invasive vegetation and trees are encouraged to be used to meet requirements....." Rather than "Existing vegetation and trees may be used to meet the requirements..."
#7805	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov	Will confirm with County Urban Forester, but I believe the FSM limits the trees that can be used to count toward buffer requirements and does not include invasive species.

ID	Section
Date:1/24/2022	
#8655	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022	See Section 5.07.01.D. Also, consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species % and removal of invasives requirements are in the FSM. NRT is anticipating an update to the FSM to address native species policies of the 2019 GP as a companion to the ZO Rewrite. In addition, when trees are used to count toward buffer requirements, concentrated stands of invasive species are not allowed to be counted per FSM.
#6882	7.04.03 Buffer Yards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.03 BUFFER YARDS: Where in this section does the County address the need for buffers for illegal landfills, stockpiles of dirt and "personal recreational fields"? These sites need to be heavily buffered and/or screened from neighboring properties. For example, the Gable landfill rises more than 30 feet at the top of the Watershed over 18 acres. Why is there no buffer or screen anywhere on this site?
#7807	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	We would not require a buffer of an illegal use, because the use is not permitted. Stockpiling is subject to Section 5.07.03.A.6.
#6881	7.04.03 Buffer Yards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.03.1 USE BUFFER YARD MATRIX: Where in this matrix does the Gable landfill or "personal recreational field" or stockpile fall under? Category 6? Community and Active Recreation Uses, and if so, what are the buffer requirements?
#7808	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	We would not require a buffer of an illegal use, because the use is not permitted. Stockpiling is subject to Section 5.07.03.A.6.
#6829	7.04.03 Buffer Yards
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	Buffer matrix: Buffers need to be shown for such uses as wineries, breweries, country inns, etc. and they need to be substantial. As the table is written, they would claim to be "Agricultural" and need only minimum buffers.

ID	Section
#6939	7.04.03 Buffer Yards
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Noted. Staff will contemplate this suggestion. Mark for follow-up.
#7804	7.04.03 Buffer Yards
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	See also Section 5.07.03.A.6
#13742	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.07.02.A.4. Road corridor buffers should not be on private residential lots, regardless of size.
#9901	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Bill junda Tags: zoc Bjunda@gordon.us.com Date:4/26/2022	Prohibiting street trees on private lots doesn't work. Street trees are not required in VDOT ROW and therefore MUST be placed on lots.
#7574	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/21/2022	General Provisions: 5 and 6. Road Corridor Buffers should not be permitted to be on private residential lots of any size due to conflicts with homeowner lot management and difficulty of enforcement years down the line. Suggestion: End the sentence for #5 after the word "lots" and delete #6.
#7780	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	There are only rare instances when this is permitted. It is permitted to allow in these rare instances so that the road corridor can be provided in these cases.
#7496	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/19/2022	Should Road Corridor buffers be revised in Urban districts to align with removal of setback criteria?

ID	Section
#7781	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	See 5.07.01.B.2.a. which only requires road corridor buffers along the edge of certain districts, including urban districts.
#7257	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.07.02-1. LANDSCAPING, BUFFER YARDS, SCREENING. Road Corridor Buffer. TABLE. While perhaps laudable to acknowledge the W&OD Trail, it is not a Road Type and therefore inappropriate in this table.
#7782	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	This has been a longstanding requirement and is not proposed for revision.
#7253	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/16/2022	Does Table 5.07.02.-1 show all the possible road types? It should. See my previous comment relative to Alleys, etc.
#7783	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Agree with concept. Will evaluate further and revise accordingly.
#8675	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/17/2022	Revised table as suggested
#7252	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com	The Exception to not require street trees in alleys, etc seems to be in the wrong place. Could it be placed in Table 5.07.02-1, where it and any other road not requiring street trees would be shown with 'NA' in the Buffer Type column?

ID	Section
Date:1/16/2022	
#7784	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Agree with concept. Will evaluate further and revise accordingly.
#8674	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/17/2022	Revised table as suggested
#7171	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	5.07.02.E Please confirm that the new requirement of 20 plant units per 100 feet of street is 20 on one side of the road or a total of 20 (both sides combined) per 100 feet? This should be worded clearer.
#7169	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	5.07.02.E.1.a exempts certain types of private streets not needing street trees. This is an area that should be further examined. While E.1 states to plant the trees along areas dedicated for vehicular access as E.1.a shows there are areas that should not have street trees. This should be made clearer. For one, private drives do not need street trees. There are other forms of vehicular access that function as parking lots that don't need street trees. The term "dedicated" is used. What does that really mean? The draft ordinance exempts a commercial use, but street trees are not required in any commercial areas. I would be happy to meet separately if it helps offering advice on improvements to this area.
#7786	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Will evaluation further and revise as appropriate.
#8676	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/17/2022	Made revisions to address comments.

ID	Section
#6990	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/5/2022	Gateway buffers require buffer immediately adjacent to ROW, and all plant material within first 50'. No opportunity to shift buffer backwards in the event of natural features that preclude landscaping (wetlands....) should be carved out in the event wetlands (or similar) exist in that specific area immediately adjacent to ROW which would not allow the required buffer to be installed.
#7789	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	If this issue arises, then the applicant can request a waiver or modification in accordance with 5.07.08.
#8673	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/17/2022	See also, 5.07.02.A.4.
#6977	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/5/2022	Please add significant undisturbed buffers for any road that the VA Department of Historic Resources deems appropriate for listing on the National Register of historic Places.
#7790	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	I am not sure what this comment is suggesting. That buffers be undisturbed if they are significant and allow NR listed roads?
#8581	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/15/2022	In general, the buffer requirements are not applicable to ag uses or uses in the rural districts. We also cannot require the retention of buffers because something is listed in the state or national registers for historic places. This protection could be available to roads in the Historic Roadways District, which are locally designated, and the requirement would be in the district guidelines, not in this section.
#6964	7.04.02 Road Corridor Buffers and Setbacks, Street Trees

ID	Section
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	E.3 Specific Requirements for Street Trees. FSM does require variety in tree species, but should also be updated to require a higher percentage of native trees (suggest 80% be designated in ZO and FSM)
#7792	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Will consult with County Urban Forester and determine best location/way to address removing invasive species and revise appropriately.
#8654	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species % requirement is in the FSM. NRT is anticipating an update to the FSM to address native species policies of the 2019 GP as a companion to the ZO Rewrite. In addition, the Urban Forester noted that increasingly they see more native species in landscape palettes.
#6963	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:1/5/2022	5.07.02 Road Corridor Buffers and Setbacks A change in A.5 General Provisions-- to remove buffers from individual lots of any size would eliminate the need for A.6
#7793	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	There are only rare instances when this is permitted and it is only an option, not a requirement. It is permitted to allow in these rare instances so that the road corridor can be provided in these cases.
#6962	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	A. General Provisions 5. Why should Road corridor buffers be permitted on any residential lots, regardless of size when an individual homeowner would be impacted? Suggest ending the sentence after the word "lots."
#7794	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	There are only rare instances when this is permitted and it is only an option, not a requirement. It is permitted to allow in these rare instances so that the road corridor can be provided in these cases.
#6880	7.04.02 Road Corridor Buffers and Setbacks, Street Trees

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.02.E.3 ROAD CORRIDOR BUFFERS & SETBACKS. Specific Requirements for Street Trees. It currently states that "all vegetative material must meet the specifications included in the FSM." Does the FSM need to be updated to include greater provisions to comply with new 2019 General Plan policies in regards to native plants, pollinator habitat, and removal of invasives that have not yet been updated in the FSM? If so, how and when? Otherwise, circular logic will not result in requiring updates to the FSM, because it was not required by the Zoning Ordinance.
#7796	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Will consult with County Urban Forester and determine best location/way to address removing invasive species and revise appropriately.
#8580	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/15/2022	Moved to Section 5.07.01 because it applies to all buffers provided in this section.
#8672	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/17/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species %, pollinator, and invasive species removal requirements are in the FSM. NRT is anticipating an update to the FSM to address these policies of the 2019 GP as a companion to the ZO Rewrite. In addition, the Urban Forester noted that increasingly they see more native species in landscape palettes. Also, added removal of invasive species requirement for existing vegetation to be used as a buffer.
#6879	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.02.D.1 ROAD CORRIDOR BUFFERS & SETBACKS. Gateway Corridor Buffer. The supporting pollinator habitat references 5.07.07.B.8, but should it be 5.07.07.B.7?
#6878	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.02 A-D ROAD CORRIDOR BUFFERS & SETBACKS. Since D.1 specific requirements for Gateway Corridor Buffers includes specific language for pollinator habitat, but the other buffer types do not, it is not clear if all buffer types are to follow the same requirements. Supporting pollinator habitat is also mentioned under General Landscape Provisions, which would seem to apply to all buffer types. If it is to be required in all buffer types, why is it not mentioned?

ID	Section
#7797	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Will consider edits to clarify requirements. As proposed, all buffers must meet the pollinator requirement.
#8558	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/15/2022	Deleted under Road Corridor Buffers and Setbacks and retained as general requirement that applies to all buffers.
#6831	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	Please add significant buffer requirements along Virginia Scenic byways and roads in a County Historic Roadway District.
#6938	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Noted. Staff will contemplate this suggestion.
#8582	7.04.02 Road Corridor Buffers and Setbacks, Street Trees
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/15/2022	In general, the buffer requirements are not applicable to ag uses or uses in the rural districts. We also cannot require the retention of buffers because something is identified as a Virginia Scenic Byway. This protection could be available to roads in the Historic Roadways District, which are locally designated, and the requirement would be in the district guidelines, not in this section.
#9745	7.04.01 Purpose, Applicability, and Exceptions
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/22/2022	5.07.01.B should include CPAP's/grading permits/early grading where a future application will be submitted for the ultimate use. as written (and as currently in force) an early grading CPAP triggers the need to bond/construct road corridor buffers even when a future site plan will be needed for the ultimate use, likely needing to impact the buffers planted with the early grading plan
#6877	7.04.01 Purpose, Applicability, and Exceptions
By: Maura Walsh-Copeland Tags: zoc	5.07.01.D PURPOSE, APPLICABILITY AND EXCEPTIONS.. The current Tree Conservation Plan within the FSM does not include minimum requirement of

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:1/3/2022</p>	<p>native vegetation. Strategy 6.2.C specifically states development "ensure" that it "incorporates existing native vegetation and plantings of native vegetation into the landscape design." Shouldn't this section include a requirement that it is existing native vegetation and supplemented by new native vegetation? (The word "native" is currently missing.)</p>
#7756	7.04.01 Purpose, Applicability, and Exceptions
<p>By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022</p>	<p>Will consult with County Urban Forester and determine best location/way to address achieving native species and revise appropriately.</p>
#8653	7.04.01 Purpose, Applicability, and Exceptions
<p>By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022</p>	<p>Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species % requirement is in the FSM. NRT is anticipating an update to the FSM to address native species policies of the 2019 GP as a companion to the ZO Rewrite. In addition, the Urban Forester noted that increasingly they see more native species in landscape palettes.</p>
#6876	7.04.01 Purpose, Applicability, and Exceptions
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022</p>	<p>5.07.01 PURPOSE, APPLICABILITY AND EXCEPTIONS. We appreciate the inclusion of NHR Policy 7 Strategy 6.2.D on pollinator habitat to apply to all new landscaping rather than just the Rt. 7 corridor, as noted on Page 4 of the 1.5.22 Cover Memo. However, why is this not mentioned as part of section 5.07.01?</p>
#6875	7.04.01 Purpose, Applicability, and Exceptions
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022</p>	<p>5.07.01 PURPOSE, APPLICABILITY AND EXCEPTIONS. While "contribute to ecosystem benefits" is good language to include, it could be more specific. Why are more elements of NHR Policy 7 Strategies and actions related to 6.1 and 6.2 not included in this section?</p>
#7755	7.04.01 Purpose, Applicability, and Exceptions
<p>By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022</p>	<p>Will revisit 2019 GP policy and revise purpose statement as appropriate.</p>
#8564	7.04.01 Purpose, Applicability, and Exceptions
<p>By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/15/2022</p>	<p>The requirement to provide buffers between uses is not the regulatory method to achieve the policies, strategies, and actions of Sections 6.1 and 6.2.</p>

ID	Section
#6874	7.04.01 Purpose, Applicability, and Exceptions
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07.01 PURPOSE, APPLICABILITY, AND EXCEPTIONS, Purpose: Shouldn't the County encourage the use of native plants in landscaping? Why is there no mention in this section of naturalistic plantings especially for government buildings and sites?
#6873	7.04.01 Purpose, Applicability, and Exceptions
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	"5.07.01 PURPOSE, APPLICABILITY, AND EXCEPTIONS, PURPOSE: Is this list intended to be a comprehensive list? Should add: ""Protect our night sky from light pollution and intrusive artificial light; Enhance water quality and storm water control by reducing runoff and erosion; Reduce heat-island impact; Increase property values to homeowners by 10%-20%; Increase economic benefits to homeowners and commercial property owners; Reduce crime; Clean our air; Protect, feed and shelter wildlife;"
#7757	7.04.01 Purpose, Applicability, and Exceptions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Will revisit 2019 GP policy and revise purpose statement as appropriate.
#8563	7.04.01 Purpose, Applicability, and Exceptions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/15/2022	Protect our night sky from light pollution and intrusive artificial light - Addressed in Performance Standards and/or FSM for lighting. Enhance water quality and storm water control by reducing runoff and erosion - added language consistent with 2019 GP Increase property values to homeowners by 10%-20%; Increase economic benefits to homeowners and commercial property owners; Reduce crime; - did not add, as not policy in the 2019 GP. Some Purpose statements address Clean our air; Protect, feed and shelter wildlife; - added language consistent with 2019 GP. Reduce heat-island impact - added language consistent with 2019 GP
#6871	7.04.01 Purpose, Applicability, and Exceptions
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.07. LANDSCAPING. PURPOSE & APPLICABILITY. D. Regular references to "existing vegetation MAY be used. It seems that it should using existing vegetation SHOULD be encouraged.
#7759	7.04.01 Purpose, Applicability, and Exceptions
By: Kate McConnell Tags: staff	Allowing it to be used is encouragement. It cuts down on landscaping costs. Many people use existing vegetation to achieve buffers.

ID	Section
kate.mcconnell@loudoun.gov Date: 1/24/2022	
#6870	7.04.01 Purpose, Applicability, and Exceptions
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.07 LANDSCAPING BUFFER YARDS, SCREENING AND LANDSCAPE PLANS. Except for 5.07.04 Cemetery, Burial Ground, and Grave Buffer, there are no mentions of invasive species removal. As per 2019 General Plan FTV Policy 4 Strategy 4.1.C, shouldn't language be included throughout Section 5.07 to "require the removal of invasive plant species during the development process"?
#7758	7.04.01 Purpose, Applicability, and Exceptions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/24/2022	Will consult with County Urban Forester and determine best location/way to address removing invasive species and revise appropriately.
#8562	7.04.01 Purpose, Applicability, and Exceptions
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 2/15/2022	Addressed removal of invasive species in Policy section.
#13761	7.03 Tree Planting, Replacement, and Preservation
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date: 7/18/2022	5.06.E. Where there are unwooded wetlands onsite, tree canopy coverage credits should be added to promote habitat beneficial to amphibians that require woodlands in their adult phase.
#13741	7.03 Tree Planting, Replacement, and Preservation
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date: 7/18/2022	5.06.C.2 Trees provide for greater ecological function and value than grass. The requirement to match the pre-development amount of tree canopy is inadequate. Adding tree canopy to such sites should be incentivized through the environmental checklist.
#13740	7.03 Tree Planting, Replacement, and Preservation
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date: 7/18/2022	5.06.A. Add requirement for 80% of trees to be native species.

ID	Section
#13738	7.03 Tree Planting, Replacement, and Preservation
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.06.E Tree cover credit should incentivize the preservation of mature trees with greater ecological value, and high quality successional habitat. It should be included in the environmental resource checklist. Require replacement of mature trees at a three to one ratio of young trees for every 1 mature tree lost in FSM.
#7571	7.03 Tree Planting, Replacement, and Preservation
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/21/2022	Purpose Encourage the preservation of existing trees to meet canopy requirements. Suggested addition: Encourage the preservation of existing trees to meet canopy requirements and to support insect populations critical to human and wildlife food webs.
#7761	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Will consult 2019 GP and Community Planning regarding suggested language and revise as appropriate.
#8559	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/15/2022	Revised Purpose statement with policies and language from the 2019 GP. The specific language proposed is not included in the plan.
#7569	7.03 Tree Planting, Replacement, and Preservation
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/21/2022	Purpose: Kate, Thank you for the additions to this section! Under the second bullet, I'd suggest a slight alteration since as it stands, it might confuse the reader that "corridor" refers to road corridors (and how I also initially read it). Suggestion: "Prioritize the planting of native vegetation, specifically to create wildlife habitat corridors that provide connections between..."
#7760	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Revised slightly to clarify wildlife corridor but also keep with language of 2019 GP.
#7168	7.03 Tree Planting, Replacement, and Preservation
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com	I cant find street trees. 5.06.B.2.d points me to 5.07.02.E. This then says "where required" "provide them". Street trees are only required in certain types of subdivisions. The following wording in the existing ordinance, I can not find -

ID	Section
Date:1/12/2022	For development requiring a plan of subdivision, but not a site plan, property not zoned A-3, A-10, AR-1, AR-2, i.e. single family and duplex dwellings. When a plan of subdivision is required under the Land Subdivision and Development Ordinance and the property is not zoned A-3, A10, AR-1, AR-2, a landscape plan shall be included at Record Plat or construction drawings, whichever shall occur first, that provides for the planting or replacement of trees on the site to the extent that, at maturity of twenty (20) years, minimum tree canopies will be provided as follows: Street trees are only required as an element of this section and I don't see it anywhere.
#7498	7.03 Tree Planting, Replacement, and Preservation
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/19/2022	I have since found this text. You can ignore this comment
#7497	7.03 Tree Planting, Replacement, and Preservation
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/19/2022	Need to exclude Electrical Substations from Tree Canopy requirements. Substation sites are often pigeon holed into leftover unwanted land and they are an ESSENTIAL utility for all county stakeholders. The transmission and distribution lines in and out preclude extensive canopy for safety reasons.
#7762	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Please provide an example where this has been an issue. Confirmed with County Urban Forester that meeting canopy requirements in this scenario has been worked out in the past. However, will conduct more research and evaluate the most appropriate way to address this potential concern.
#7247	7.03 Tree Planting, Replacement, and Preservation
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/16/2022	.A.3 references a section that does not exist--should be 5.07.07.D?
#7167	7.03 Tree Planting, Replacement, and Preservation
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	Both 5.06 and 5.07 bounce around concerning "Standards". AmericanHort seems to be a general abbreviation, other times other conflicting organizations are cited, later other sections of the Zoning Ordinance are cited, and finally there are references to go to the FSM because it's the source to use. I'm not sure all of the paths end in the same place and likely contradict each other. All of the Zoning Ordinance should reference one concise area in the FSM to see the technical standards as far as planting, materials, size, placement, methodology, etc., etc. All of 5.06 and 5.07 should point only to the FSM. The FSM was

ID	Section
	recently updated, but if it is lacking correct that document - the FSM is where all of these references should point.
#7763	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	AmericanHort is from State Code and is the name of the organization - see https://www.americanhort.org/ . No plant sizes or FSM references have been revised, but will confirm with County Urban Forester that requirements are not duplicated and in the appropriate place.
#8670	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/17/2022	The regulation of plant size in the ZO and plant type in the FSM was addressed with the recent buffer ZOAM and has not been changed with these revisions.
#7166	7.03 Tree Planting, Replacement, and Preservation
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	I find it impossible to find what has changed in 5.06 and 5.07 without the benefit of a redline markup.
#8560	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/15/2022	General response about redlines provided to ZOC.
#6961	7.03 Tree Planting, Replacement, and Preservation
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:1/5/2022	B. Canopy requirements 2.c Why not require 2.5% or 3,000 square feet, whichever is more?
#6992	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/5/2022	A lot in this scenario could be 3,000 SF (or less), so the "or less" wording accounts for smaller lots/does not create a scenario where the entire lot would have to be used to meet the canopy requirement.
#6960	7.03 Tree Planting, Replacement, and Preservation

ID	Section
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 1/5/2022	5.06 Tree Planting, Replacement, and Preservation B. Canopy Requirements. Hopefully the General Assembly will strengthen tree regulations. But in addition to those requirements, in order to protect existing trees, what kind of incentive could staff come up with to foster the preservation of existing trees. Mature trees have much greater ecological, stormwater and canopy benefits, so those benefits could be preserved?
#7002	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/6/2022	Added 5.06.B.5, which allows tree cover credit for preserving existing trees. In consultation with County Urban Forester there was not much appetite for reducing required canopy because they retained trees to meet the canopy requirement. However, will revisit again to identify opportunities to support tree preservation.
#8827	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 2/24/2022	Consulted with County Urban Forester. While they agree that incorporating credit will be beneficial and an option to encouraging conservation, this will necessitate a companion amendment to the FSM indicating how the credit will be applied.
#6959	7.03 Tree Planting, Replacement, and Preservation
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 1/4/2022	5.06 Tree Planting, Replacement, and Preservation A. General Standards. To foster biodiversity and resist the spread of disease, add a reference under General Standards to augment the FSM language: Trees used to meet planting, replacement and preservation requirements should be 80% native. AND No more than 1/4 of plantings consisting of more than 40 trees shall consist of a single tree species.
#6993	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/5/2022	The no more than 1/4 of 40 trees may be a single species requirement is an FSM requirement for new plantings to meet canopy requirements. A goal of the rewrite is to eliminate duplicate regulations (and thereby decrease the chance of inconsistencies over the long term). However, will consider inclusion of a native species percentage requirement.
#8666	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 2/17/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species % requirement is in the FSM. NRT is anticipating an update to the FSM to address native species policies of the 2019 GP as a companion to the ZO Rewrite. In addition, the Urban Forester noted that increasingly they see more native species in landscape palettes.
#6958	7.03 Tree Planting, Replacement, and Preservation

ID	Section
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 1/4/2022	While tree plant types have been moved to the FSM, it seems that the purpose of Section 5.06 should include some overarching language that details the reasoning behind the specific tree requirements in the FSM--especially since the FSM is waivable. Add under Purpose: Foster greater biodiversity and ecological integrity by prioritizing the use of Virginia native tree species.
#7765	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/24/2022	Will consult 2019 GP and Community Planning regarding suggested language and revise as appropriate.
#8671	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 2/17/2022	Revised purpose statement based on plan policy. Also, consulted with Natural Resources Team who indicated that the issuance of waivers has decreased recently and the request for a waiver must be accompanied with mitigation and/or offsets.
#6869	7.03 Tree Planting, Replacement, and Preservation
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.06.B.4 CANOPY REQUIREMENTS, 4: Though tree canopy requirements can be filled with preservation of existing trees or replacement of trees, shouldn't the County be encouraging the preservation of existing trees on a site? Can Staff change the first sentence to: "Existing trees are encouraged to be preserved and may be included to meet..." rather than "Existing trees which are to be preserved may be included..."
#6995	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/5/2022	Revised.
#6868	7.03 Tree Planting, Replacement, and Preservation
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.06.B.1 TREE PLANTING, REPLACEMENT AND ENFORCEMENT. These percentages should be raised to better protect trees. Are there higher percentages allowed by Virginia Code?
#6996	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov	Not currently. These are the maximum requirements allowed by state code.

ID	Section
Date:1/5/2022	
#6867	7.03 Tree Planting, Replacement, and Preservation
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	"5.06.A.4 TREE PLANTING, REPLACEMENT AND ENFORCEMENT. The current FSM Table 3 of Tree Conservation and Landscape Plan includes 45% non-native trees. Why does the Zoning Ordinance not include a 100% (or other minimum percentage) native trees and shrubs requirement? A minimum requirement is needed to prioritize native vegetation per the 2019 General Plan - FTV 4.2 Action A. (The Zoning Ordinance needs to be updated to initiate an update of the FSM. Otherwise circular logic of the ZO pointing to the FSM before the FSM standards have been updated to reflect the new ZO is circular and non-effective.) When will this review be done for ZOR/FSM updates?"
#7771	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Will consult with County Urban Forester regarding appropriate percentage and location for requirement and revise accordingly.
#8668	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/17/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species % requirement is in the FSM. NRT is anticipating an update to the FSM to address native species policies of the 2019 GP as a companion to the ZO Rewrite. In addition, the Urban Forester noted that increasingly they see more native species in landscape palettes.
#6866	7.03 Tree Planting, Replacement, and Preservation
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.06 TREE PLANTING, REPLACEMENT AND PRESERVATION. Why are 2019 General Plan NHR Policy 6 strategies 6.1 actions A-C, and 6.2 actions A-E not incorporated into Section 5.06? While 6.2.D is included in Section 5.07, many of these strategies and actions also apply to this section as they relate to protecting wildlife, wildlife corridors, native vegetation, and other elements that relate to trees. How/where will they be incorporated?
#7779	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	The state code enabling the tree preservation requirement is very limited in what we can require. The County cannot require preservation and limits the canopy percentages to those included in the regulations.
#6865	7.03 Tree Planting, Replacement, and Preservation

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.06 TREE PLANTING, REPLACEMENT AND PRESERVATION. While the policy statement was updated to be consistent with 2019 GP Policy Chapter 3, FTV p.3-7 and FTV Action 4.1.B., there are many other relevant and important policies as part of FTV Policy 4 including, but not limited to, 4.1.C "require the removal of invasive plant species during the development process" and 4.2.A "prioritize the planting of native vegetation, specifically along those corridors that provide connections to other natural, environmental, and heritage resources". Why was this, and other actions from FTV policy 4 omitted from the Zoning Ordinance? And, why are there not corollary ordinances related to removal of invasive species and planting native vegetation along corridors (which would reduce habitat fragmentation)?
#7778	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	Will consult with County Urban Forester and determine best location/way to address removing invasive species and revise appropriately.
#8667	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/17/2022	Consulted with the County Urban Forester and Natural Resources Team (NRT). The appropriate location for the native species % and removal of invasive species requirements is in the FSM. NRT is anticipating an update to the FSM to address native species policies of the 2019 GP as a companion to the ZO Rewrite. The FSM does not allow concentrated stands of invasive species to count toward tree conservation areas. In addition, the Urban Forester noted that increasingly they see more native species in landscape palettes.
#6864	7.03 Tree Planting, Replacement, and Preservation
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.06 TREE PLANTING, REPLACEMENT AND ENFORCEMENT. Does this satisfy the requirement for a Tree Preservation Ordinance? Or will a separate ZOAM be used to satisfy the 2019 General Plan policy for a Tree Preservation Ordinance?
#7769	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/24/2022	The County is limited to the enabling statute referenced at the beginning of this section. We cannot require tree preservation, only encourage preservation and require replacement.
#6863	7.03 Tree Planting, Replacement, and Preservation
By: Maura Walsh-Copeland Tags: zoc	5.06 TREE PLANTING, REPLACEMENT AND ENFORCEMENT. Why is there no mention of requiring tree plans to join with neighboring contiguous habitats to reduce habitat fragmentation and promote wildlife corridors?

ID	Section
Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	
#7770	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/24/2022	Will evaluate inclusion, as well as cross references to other requirements in the zoning ordinance that address connecting open space.
#8669	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 2/17/2022	Connection with other habitats is addressed in open space development standards. Since we cannot require the preservation of trees to meet canopy requirements due to state code limitations, it would be illogical to require connections in this section. The FSM also encourages connections with tree conservation areas.
#6862	7.03 Tree Planting, Replacement, and Preservation
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.06. TREES: This is overall very weak on preserving existing trees. Lots on "planting" and "replacement" - the latter indicating removal of existing trees, which cannot be actually replaced as they would have been already established. I assume that the strong recommendation of use of native species (for all plantings) is in the FSM.
#7777	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 1/24/2022	The state code enabling the tree preservation requirement is very limited in what we can require. The County cannot require preservation and limits the canopy percentages to those included in the regulations.
#8665	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 2/17/2022	Also revised canopy requirements in the ARN, ARS, A-3, and A-10 so that they have to replace 20% of canopy or, if less, the amount of existing canopy, but at a minimum provide 2.5% or 3,000 SF/lot.
#6827	7.03 Tree Planting, Replacement, and Preservation
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 1/2/2022	Paragraph B should probably state that existing trees count toward canopy requirements.

ID	Section
#6828	7.03 Tree Planting, Replacement, and Preservation
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	Ignore last comment - This was handled in the draft later on.
#6826	7.03 Tree Planting, Replacement, and Preservation
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	5.06.B should impose minimum tree canopy (existing plus supplemented) on all single-family subdivisions in ARN and ARS. Perhaps the most offensive land development is a SFD subdivision in what used to be a pasture, with only minimal tree planting. Impose a canopy requirement and eventually these projects may heal in and look better.
#6936	7.03 Tree Planting, Replacement, and Preservation
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Noted. We will discuss such a provision internally .
#8561	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/15/2022	Added a requirement by eliminating exempted districts. Now all subdivisions for single-family and duplexes must meet the canopy requirement in B.2.
#6825	7.03 Tree Planting, Replacement, and Preservation
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	A.1. "American Hort." should not be abbreviated and probably needs an explanation.
#6937	7.03 Tree Planting, Replacement, and Preservation
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Too late in the day to run past our team of foresters & arborists, but flagged for follow up after consultation with them.
#6994	7.03 Tree Planting, Replacement, and Preservation
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:1/5/2022	This is the term in the state code and it is the name of the organization. See https://www.americanhort.org/ .

ID	Section
#11560	7.02.12 Modifications
<p>By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/13/2022</p>	<p>There needs to be alternative for Open Space modificatoins other then Rezoning to a PD district. Example: A Substation is deeded a parcel from an existing development that is specifically sized only for its use and required buffers. That Zoning district is required 30% open space. The only open space on that parcel is Buffer yards. Remainder of the area has open space on other parcel. No opportunity to request modification of open space?? Really want applicants rezoning to PD???</p>
#11027	7.02.12 Modifications
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"5.04.12 OPEN SPACE. MODIFICATIONS. e. states, ""permission to locate uses in open space must be governed by the zoning district within which the site, parcel or development is located."" This indicates that it IS possible and feasible to assign different Uses permitted in Open Space by zoning district, correct? Staff Response: Maybe. Section has been updated. Staff answered that it was possible. 2022 Round 3 Input: Direct request for the capability and applicability to assign different Uses permitted in Open Space by zoning districts and/or existing overlay district. "</p>
#13736	7.02.11Ownership, Operation, and Management of Common Open Space
<p>By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022</p>	<p>5.04.11.D. Add "must be placed into a conservation easement" to the language describing the restrictive covenants.</p>
#13728	7.02.10 Maintenance and Management of Open Space
<p>By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022</p>	<p>5.04.10.C.1 It's good that maintenance includes removal of invasive or noxious plants, please add that removal of these plants is required.</p>
#13725	7.02.09 Comprehensive Open Space Plan
<p>By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022</p>	<p>5.04.09.A.1. In the sentence add that the Comprehensive Open Space Plan should be depicted on top of the existing conditions plat. This section should also state that native plant communities are to be mapped and ranked according to their ecosystem functional value.</p>
#13716	7.02.08 Uses in Open Space
<p>By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org</p>	<p>5.04.08.D.2. Use specific standards should exclude meat processing as inappropriate for residential open space areas.</p>

ID	Section
Date:7/18/2022	
#9702	7.02.08 Uses in Open Space
By: russ forno Tags: zoc russ.forno@ofplaw.com Date:4/19/2022	Farm Market, off-site production should also be allowed in open spaces. Promotes agri-sales and a greater flexibility to reach residential communities, as well as reduces traffic.
#13715	7.02.07 Trails
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.04.07.A.2.a Natural surface trails on steep terrain and heavily wooded areas may not have "an alternate route around the obstruction." Substitute wording that requires alternative trails that are appropriately surfaced and only contain manageable slopes for wheelchair access.
#11025	7.02.06 Type-Specific Open Space Design Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.04.06.D&E. OPEN SPACE Standards & Type-Specific Open Space Design Standards/Outdoor Gathering Space. Amenities on parcels greater than [TBD] must include restrooms at regular intervals or those must be in close proximity and open the public. PRCS and NOVA Parks, including the W&OD Trail, already are providing this necessary amenity. Have PRCS and NOVA Parks been asked to determine the appropriate interval? 2022 Round 3 Input: Unclear. Mentions of restrooms specifically have been removed."
#13882	7.02.05 Open Space Design Standards
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.04.05 Open Space Design Standards. Ensure that standards for open space do not prohibit installation of community solar, district energy, or geothermal/ground source heat pumps in landscaped areas that will not disturb natural vegetation.
#13707	7.02.05 Open Space Design Standards
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.04.05.B.4 Consider adding the words, "except for community farms or gardens" to the end of the sentence.
#13703	7.02.05 Open Space Design Standards
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org	5.04.05 A.1.c Does this wording work for urban open space areas that are small and intended to provide gathering spaces or respite within the built environment?

ID	Section
Date:7/18/2022	
#13701	7.02.05 Open Space Design Standards
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.04.05.A.8 If open space includes natural surface trails, it is important for some natural surface trails to be accessible in every area, but not all natural surface trails can be made accessible without creating environmental harm. Add exclusion for natural surface trails in steep or environmentally sensitive locations.
#13698	7.02.05 Open Space Design Standards
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.04.05.B.3. Consider the checklist score as a means for determining if more of the floodplain can be counted toward open space.
#11024	7.02.05 Open Space Design Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.04.E.1 OPEN SPACE STANDARDS. Are wetlands mitigation projects defined as a ""water feature""? Shouldn't wetlands be explicitly added? Shouldn't wildlife travel corridors and native vegetation for pollinators also be included in contiguous habitats to protect against habitat fragmentation (and not just trees)? 2022 Round 3 Input: Partially addressed . Wetlands were added, but not wildlife corridors, native vegetation, or pollinator habitat. Staff noted a consensus could cause these to be added."
#11023	7.02.05 Open Space Design Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.04.04.A.5&6 OPEN SPACE STANDARDS. As noted, shouldn't native vegetation for pollinators be included? Also, in regards to bullet ""e"", the LPAT Framework Plan includes more than just pedestrian or bicycle trail considerations, shouldn't linear parks and wildlife corridors also be included as part of the LPAT Framework Plan considerations? 2022 Round 3 Input: Partially addressed. Wildlife habitat was addressed, but not LPAT. Though staff mentioned that pollinator habitat would be too specific to maintain, monitor, or describe in protective easement."
#13694	7.02.04 Credits for Inclusion in Open Space
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.04.04 A. Instead of providing bonus credits for important resources, reconsider this section to start with protection of all resources in checklist format. The checklist would be used to subtract points for non-priority resources not proposed to be protected. Requests for waivers would depend on that score.
#11556	7.02.04 Credits for Inclusion in Open Space

ID	Section
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/13/2022	C. Other Credit This lists Buffers and SWM ponds as receiving .75 credit for total area of open space. However per Section 5.03.03, these do not fit into a category and thus wouldn't count at all towards open space. Needs to be rectified with a new cattergorey.
#11022	7.02.04 Credits for Inclusion in Open Space
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.04.04.A OPEN SPACE. PRIORITIES AND BONUS CREDIT. Indicates various ""bonus credit"" will be applied for various types of open space (e.g., prime ag soils, forest, trails, historic resources, etc.) Please provide an example calculation to show how the ""bonus credit"" is applied. How will the ""bonus credit"" be applied for ZOAM-2020-0002 calculation with open space for cluster subdivisions? [OR does 5.04.F.13 override all bonus credit for clustering?] 2022 Round 3 Input: Partially addressed. Bonus credits were clarified, but ZOAM calculation is deferred."
#11021	7.02.03 Open Space Types and Purposes
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.04.03.B.3 OPEN SPACE Categories/Private. Is there a requirement for signage designating the area as private to be considered such? Can there be? 2022 Round 3 Input: Staff noted it could be added if there was consensus" STATUS?
#9879	7.02.01 Applicability
By: Bill Junda Tags: zoc Bjunda@gordon.us.com Date:4/25/2022	Confirm that both existing and proposed public utility easements can be excluded from gross area calculation
#9266	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	Chapter 5: Development Standards 5.01E1a: Where two or more uses are located on one parcel the required parcel size should be the sum of all minimum lot sizes. For consistency this SHOULD be additive, just as parking is additive.
#9262	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04L3: Agree!

ID	Section
#9261	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04I4: Uses should include Nursery Production (unless nursery production is defined as horticulture).
#9260	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04H3a: should include trails designated as LPAT for pedestrian, bike and equestrian use. Open space LPAT trails can be along the perimeter of the property in order to connect with other development.
#9259	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04F3 Or connect to open space of another development in order to further the goals of LPAT.
#9254	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04F1a: Include equestrian and follow LPAT.
#9253	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04E2e This statement should include equestrian as defined by LPAT.
#9252	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04E1 and 2: How do bonus credits and 1:1 credits fit into house yield?
#9251	7.02 Open Space Standards

ID	Section
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04D2 Public open space. This is a good area to place LPAT and consider County ownership rather than HOA.
#9249	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04D1 Common open space. REDC questions placing sewer facilities here. Prefer they be placed on home lot.
#9244	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04C4 Clarification of meaning of last sentence? Example?
#9240	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04C4 Agricultural Should include equestrian use (boarding or pasture of)
#9239	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04C4b Passive: Should include multi-use trails, specifically LPAT (equestrian, hiking, biking)
#9238	7.02 Open Space Standards
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:3/24/2022	5.04B3a What types of easements? utility, open space, etc.
#9211	7.02 Open Space Standards
By: John Merrithew Tags: zoc Date:3/22/2022	5.04A.6 is unnecessary and should be deleted. The section creates an additional process/required documentation that simply repeats the CDP. A landscaping plan is already required for site plans. Don't need the added expense or administrative bureaucracy.

ID	Section
#9210	7.02 Open Space Standards
By: John Merrithew Tags: zoc Date:3/22/2022	5.04A.5. Is completely unnecessary and should be deleted. It simply restates A.2.
#7664	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	L.1.4 Should the COSP acronym be used here instead of "OS Plan" for consistency?
#7837	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Revision has been made.
#7663	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	L. Given the timing required for establishing an organization to maintain and administer the open space, is it possible for a developer to get credit for open space that is planned and has an signed agreement to go to the county or another entity for protection and maintenance so that the developer can get credit for providing the open space without having to go through the process of setting up an organization that won't be needed?
#7838	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Staff may be a bit confused here. If developer has a signed agreement with "another entity" it would appear the entity already exists and the time needed for a process to set up wouldn't be needed. In any event the County wouldn't be giving credit without a firm agreement.
#7662	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	L. Ownership, Operation, and Management of Common Open Space and Common Facilities. 1. Is it stated adequately elsewhere that a developer can dedicate open space to a land trust or similar entity for permanent protection of the open space as opposed to requiring the county or the HOA to take on that responsibility so that this section does not need an additional reference?

ID	Section
#7839	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	That may not be clear or obvious enough so additional language can be added.
#7661	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	K.Maintenance and Management of Open Space. 2. LPAT is just at the initial phase of implementation. There may be agreements that the county and HOAs make regarding maintenance that would be outside of what's indicated. To avoid having to revisit the ordinance for a minor tweak, can this be slightly reworded to say "dedicated and/or accepted through an appropriate process?"
#7840	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	If the comment is understood correctly, there won't be one (dedicated) without the other (accepted).
#7660	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	I. Uses in Open Space. 4.e.3.Agricultural Processing I'm not sure if the definition includes a meat processing building, but that seems like it might be too intense a use.
#7841	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Staff's opinion, current definition of agricultural processing would appear to include meat processing and a change to the definition would have wide ranging effects, not just in this section. May need an exclusion here if determined appropriate.
#7659	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/23/2022	H.6.a.To be most accessible, the LPAT Trail system is envisioned to connect to existing HOA community trails if/where the connection is welcomed by the community. In newly developing communities, these connections should provide the community the same access from the start, except for explicitly private facilities.
#7855	7.02 Open Space Standards

ID	Section
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	This section written to avoid public access to private trails in existing communities based on very strong objection to the arrangement evident from public input to LPAT. Determining existing community agreement could prove difficult and inconclusive. Revised language may be appropriate to distinguish new from existing communities.
#7658	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 1/23/2022	H. 6. Trails. LPAT trails are envisioned to be nature trails largely along streams that should definitely have accessible sections, but not necessarily be uniform in width or character. If this section is intended to provide guidance for trails that will be included in the LPAT trail system, it may be too prescriptive.
#7859	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	This is not necessarily designed for LPAT purposes but more focus on accessibility for ADA reasons.
#7657	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 1/23/2022	b.1. Green. Suggest that this should include not only a definition, but also guidance requiring the inclusion of trees, shrubs and landscaped beds for ecosystem benefits instead of just serving as a time, energy, and chemical sink of non-native turf grass mostly benefitting landscape maintenance companies. This can still allow ample space for unprogrammed play or lawn games. Too many greens get only the most sporadic use. With a bench under the trees, it will not only provide ecological benefits but will be more inviting and likely to be used. It will also provide a more desirable view from surrounding houses.
#7860	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	Assuming this applies to 5.04H.4.b.1.Green. This comment will be helpful and considered when developing a definition.
#7656	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date: 1/22/2022	H.3. a. Often open spaces may benefit by being adjacent to woods or streams and therefore be situated at an edge of a development. Can we strike 'centrally located'?

ID	Section
#7861	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Accessibility to all is an overriding concern which drives the centrally located desire but adjacent to other natural areas, especially if they are preserved is also a valid locational guide. Will review for appropriate revision.
#7655	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/22/2022	H.2.c. How do we judge whether an open space provides 'a respite from work activities'? Better to strike this?
#7862	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Agreed "respite" is vague. Revised to combine c and d.
#7654	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/22/2022	H.1.d. Why does an active recreation area need to be 'centrally located'? Central is hard to define anyway--open to interpretation. If the space is accessible by bike and ped, that should be sufficient.
#7863	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Deleted the central location requirement which may also be addressed by the 1/4 mile radius.
#7653	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/22/2022	F.12. One would not want to make Agricultural open space accessible to all individuals for a number of reasons. Nor may it not be practicable to make Natural Resource, etc. areas accessible. Edit this accordingly.
#7864	7.02 Open Space Standards
By: Steve Goodrich	Deleted as suggested because accessibility is addressed in other sections.

ID	Section
Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	
#7652	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date: 1/22/2022	F.9 Same comment as for F.8 above. What am I missing here?
#7866	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	See reply to F8 comment. F 8, 9, 10 and 11 work together to produce functional open space.
#7651	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date: 1/22/2022	F.8. Seems nonsensical. Please explain what this regulation is for?
#7865	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	F8 is an attempt to prevent meeting minimum open space requirement with un-useable or "leftover" areas. These can still be used or designated as open space because they do provide some benefit but not included in meeting minimum requirement.
#7650	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date: 1/22/2022	F.2. What difference does it make if added open space is similar or not in characteristics to the existing open space to which it is being added? Cannot open space be made of a variety types? Suppose one wanted to add a wooded area as open space which was adjacent to playing fields? Why not?
#7867	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	Good point. deleted the language.

ID	Section
#7649	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/22/2022	E.1.e. & E.2.b. Why distinguish between ag soils currently in production and those not, and therefore (as written) give a bonus for those not in production? Why not rather give the bonus in either case? Doesn't the current wording encourage people to take land out of production prior to development?
#7868	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Good comment. This may need further guidelines to determine "currently" and "not currently" in production. The intent is to try to protect known prime soils for future ag use.
#7648	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	3. Passive Recreation Space. d. Would this language prohibit open space that is on a stand-alone, non-contiguous parcel? It's not clear--perhaps it could be beefed up?
#7870	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Don't understand the comment. The intent of limiting location to local roads is to enhance the area for passive recreation which would not be as desirable next to high traffic areas.
#7647	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	F. Open Space Standards General comment on what's considered open space. The county has improved its open space standards over time to require it to be usable open space. This section works to further define that. Consider incentivizing a wide variety of green infrastructure and LID practices in public spaces through higher credits to help to encourage the use of such Best Management Practices which have multiple co-benefits.
#7883	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Will give this consideration. Incentives may be appropriate but consider that BMP's are not permanent.

ID	Section
#7646	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	F.9. To encourage the use of LID practices in parking lots, could you provide further detail regarding function? For example, an island that isn't functionally part of a parking lot stormwater storage/management system because the island is surrounded by curb with no curb cut allowing stormwater inflow, should not get full open space credit.
#7884	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	The intent is understood and can be discussed further but there is concern for the impermanence of parking lots if redevelopment occurs.
#7645	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	E. Priorities for Inclusion in Open Space and Bonus Credit. How about including Specimen and Champion Trees with adequate root zone protection getting 1.5x the area if they are not within (c) or (d)?
#7885	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	The intent is understood. Trees are not permanent and protective measures or easements on individual trees is impractical. Mature forest may cover this.
#7644	7.02 Open Space Standards
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:1/22/2022	E. Priorities for Inclusion in Open Space and Bonus Credit. 1.b. For purposes of LPAT, shouldn't major and minor floodplain be an automatic inclusion?
#7886	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Floodplain is already protected. There is the matter of unfair advantage for development that doesn't include floodplain. Although net gain is NOT a goal or criteria for open space, there would be no gain in open space.
#7643	7.02 Open Space Standards

ID	Section
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	E. Priorities for Inclusion in Open Space and Bonus Credit. 1.b. Is there a typo in the "subject to the limits of 5.04.1k" reference?
#7887	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Yes, it should be G.2.b. Changed it.
#7642	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	D. Open Space Categories 2. Public Shouldn't ownership by the county also be an option here? Could ownership also be by a separate entity that wasn't created specifically for the purpose of ownership/management, but which performs that role?
#7888	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Comment highlights other changes that may be necessary regarding categories where the County is identified as a receiver. After further review, revisions will be made.
#7641	7.02 Open Space Standards
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:1/22/2022	C. 3. Rare species and those species sensitive to human activity should also be noted for protection through open space.
#7889	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	This appears to be covered by inclusion of "threatened or endangered species habitat."
#7640	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org	B. Calculation of Open Space. Could the different items in this section that are considerations related to easements be grouped under a single sub-heading of easement considerations or something like that?

ID	Section
Date:1/22/2022	
#7890	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	2a and 4 may be saying the same thing. Will review and revise if needed.
#7639	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	A.6 Third sentence could be reworded to be clearer. Is this close to what's intended? Required open space amounts and locations must be referenced and illustrated on site plans for each parcel(s) where open space is planned to ensure the COSP total amount, type and location is achieved. Provisions to insure its long-term protection must also be noted.
#7891	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Site plans will not be the only plan where this requirement may need to be implemented. Will consider proposed language but it will take timely analysis that is not available in this exercise to reply to comments.
#7638	7.02 Open Space Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	A. 5a. Text intent isn't clear--something along these lines would be clearer: In cases where open space was not required or provided in an initial application for up to 4 dwelling units, the next piecemeal application for up to 4 dwelling units will be required to provide the required amount of open space.
#7892	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	The comment is acknowledged. Several other comments on the same section have been offered and will all be reviewed before a revision is made.
#7598	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/21/2022	.B.5. What is the point of restricting the amount of Open Space on eased property? Especially given that Open Space can have the various purposes listed in C.?

ID	Section
#7893	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Several reasons. The eased area may not contain true "open space" qualities, it may provide unfair advantages to heavily eased parcels, "protect" areas already protected and detract from other areas more appropriate for open space protection.
#7597	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/21/2022	Is F.1. referring to a Community space with a capital 'C' or is it a more generic use of the word. If the latter, this requirement is overbearing. If the former it seems reasonable. However, it does not quantify the amenities, which will lead to problems in reviewing applications. Or is such in the FSM or elsewhere. Should there be a reference to clarify?
#7894	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Community is used in the generic sense. Additional guidelines for providing amenities can be considered for ease of application.
#7504	7.02 Open Space Standards
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/19/2022	As discussed during 1/19/2022 ZOC meeting, the entire definition of Open Space changes with this draft language. Some of what was once open space would no longer count with this language: - how does this impacts Site Plan Amendments? MOST applications would never be able to file SPAM because they wouldn't be able to meet open space requirements under new ordinance -Not all open space needs the formal definitions and programming outlined in the 2019 GP. Those types of open space are necessary and relevant, but they are not the only types and the County ZO should not limit all future applications to only the few defined, formal open space categories listed within.
#7895	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Many issues contained in 1 comment. Disagree that entire definition of open space changes although the ZOR is intended to implement a new GP. Possible that additional exemptions may be warranted to address concern for SPAM. Not clear on source of the comment regarding formal definitions and programming. May need further elaboration and discussion.
#7503	7.02 Open Space Standards

ID	Section
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/19/2022	J.Comprehensive Open Space Plan. Its says "final plan set", does this mean at time of site plan? or does it mean after approval another submission is required? Having submission after BOS approval seems inappropriate. this should be a requirement of a CDP plan set throughout the process (already is requested) not required AFTER approval.
#7896	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Agreed, this section needs clarification. It is intended to require that the final version of the CDP include a final version of the COSP and that each subsequent development plan refer to and depict appropriate portions of the approved COSP if they are included within the area under review.
#7490	7.02 Open Space Standards
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/18/2022	2.c: - This is not Zoning appropriate language. Too subjective.
#7897	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	It's not clear which "2.c" this comment refers to.
#7489	7.02 Open Space Standards
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/18/2022	F.9: - every area of grass has "functional value" as it reduces impervious surface and reduces SWM runoff, all goals of the Revised GP. Thus this statement should be removed.
#7898	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Acknowledged that all pervious areas provide functional value for SWM but this doesn't always equate to open space value
#7487	7.02 Open Space Standards
By: Rich Brittingham Tags: zoc	F.8:

ID	Section
<p>rbrittingham@dewberry.com Date:1/18/2022</p>	<p>- what does this statement mean?? you can count it as open space but its doesn't count as open space..... - if we are saying any area of open space less then 1,000 SF is not open space, I disagree with this.</p>
#7899	7.02 Open Space Standards
<p>By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022</p>	<p>It means that it can be identified as open space but the amount is not included to meet the minimum requirement for the district.</p>
#7486	7.02 Open Space Standards
<p>By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/18/2022</p>	<p>F.2: - to encourage "incremental addition" of open space, essentially encouraging larger contiguous open space, there should be extra incentive. Maybe add to E.2. as 1.25x the area to encourage.</p>
#7900	7.02 Open Space Standards
<p>By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022</p>	<p>If you are saying provide extra credit for those incremental additions that are larger than the minimum required and/or are provided in 1+ acre pieces, the suggestion is understood and will be considered for addition.</p>
#7485	7.02 Open Space Standards
<p>By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/18/2022</p>	<p>F.1.b: - this essentially precludes open, unprogrammed lawn areas by requiring amenities. - this makes sense in urban areas, but not all suburban amenity open space areas should be this formal - who determines that enough amenities are installed? does 1 trash can fulfill this requirement for ZO?</p>
#7901	7.02 Open Space Standards
<p>By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022</p>	<p>Amenities are required when the space is provided as a community amenity (like outdoor gathering space) which probably needs a better description to distinguish from other types of open space. Agreed that additional standards for the number of trash cans, etc may be needed.</p>
#7484	7.02 Open Space Standards
<p>By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com</p>	<p>E.2: - language says "in any district" does this mean the area can be outside the limits of the application/property and only within the same district?</p>

ID	Section
Date:1/18/2022	
#7902	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Cannot determine which E.2 the comment applies to.
#7483	7.02 Open Space Standards
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/18/2022	C.Open Space Types and Purposes: - recognizing these types of open spaces come straight from the 2019 GP, there needs to be acknowledgement of disturbed open space that is grass, mulch, landscaped, or similar. Not sure if its new category or new language in one of the categories -current applications have received staff comment that since replanted grass lawn do not fall into any of the 2019 GP categories it does not count as open open space. - especially problematic in the Urban policy area.
#7903	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	The referenced section is intended to incorporate the GP descriptions generally. Not clear on the need for acknowledgement of disturbed open space or the background of staff comments on current applications.
#7480	7.02 Open Space Standards
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/18/2022	5.04.B.5: This section should be removed as it is a duplicate requirement of 5.04.B.4 Requiring easement holder to "acknowledge and approve" means that application can be delayed or stopped by an unresponsive easement holder. If 5.04.B.4 remains in ZO, then applicant can show deed language to ensure open space is allowed.
#7904	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Agree there is some duplication. Maybe 5 should be 4.a. County Attorney should weigh in on "acknowledge and approve" and if deed language is acceptable.
#7449	7.02 Open Space Standards

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	Submitted Jan. 5th. Resubmitted by request: 5.03. 2019 COMP PLAN SUSTAINABILITY POLICIES. How will new Zoning Ordinances to reflect the new Sustainability Policies in the new Comprehensive Plan be handled?
#7905	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Will need additional information to determine how this comment is relevant to open space requirements.
#7448	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.N.2 OPEN SPACE. MODIFICATIONS. e. states, "permission to locate uses in open space must be governed by the zoning district within which the site, parcel or development is located." This indicates that it IS possible and feasible to assign different Uses permitted in Open Space by zoning district, correct?
#7906	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	It's possible. The section needs additional language to make it clear that uses requested need BOS approval of SPEX.
#7447	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.L.1.b OPEN SPACE. Ownership, Operation & Management. b states that membership in the HOA/corp/trust/etc. must be mandatory for all residential property owners. How will this apply to ZOAM-2020-0002 lots categorized as PFL and REL? Will they be considered "residential" and be required to be a member of the HOA or equivalent?
#7907	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Project Manager for ZOAM-2020-0002 has been consulted on coordination with ZOR and we have concluded that ZOAM language needs to be finalized before adjustments are made to ZOR and that continuous coordination is critical. Application of noted section is unclear at this time.
#7446	7.02 Open Space Standards

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.K.3.f. OPEN SPACE. Add "Maintenance of any prepared surface, e.g., multi-use path or trail, or sidewalk." Any of these features present must be maintained too.
#7908	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Done
#7445	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.K.3 OPEN SPACE STANDARDS. Maintenance and Management of Open Space. These requirements do not seem to reflect the flexibility to manage and maintain pollinator meadow habitat. Given that most habitats in Loudoun County would grow into a forest if given the chance, shouldn't flexibility be given to actively manage for pollinator meadow habitat? This may result in native trees being taken down in order to maintain it as a meadow. In order to enforce this, there may need to be further definitions within the zoning ordinance or FSM on what defines a pollinator meadow (to be included in CDPs), so more standards in regards to native vegetation requirements may need to be created, but this would help implement priorities regarding native vegetation in the 2019 GP.
#7910	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	In my opinion this is too specific for Zoning Ordinance to handle, regulating or defining pollinator habitat, may be more appropriate for natural resources team.
#7444	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.J OPEN SPACE STANDARDS. Comprehensive Open Space Plan. Shouldn't these plans also include linear parks? This section raises another question, are linear parks defined within the new Zoning Ordinance, as defined by the Linear Parks and Trails Plan? As mentioned previously, only design standards including trails, and not linear parks, of the Linear Parks and Trails plan have been included in this section of the zoning ordinance.
#7911	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov	Even though they are not mentioned doesn't mean that type of park per LPAT design could not be provided as open space.

ID	Section
Date:1/25/2022	
#7443	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.1.1., 3 & 4. USES IN OPEN SPACE. How will Uses in open space be applied for ZOAM-2020-0002, specifically, will the restrictions and standards only apply to "open space lots" or will PFLs (prime farmland lots) and RELs (Rural Economy Lots) have similar or the same requirements?
#7912	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Unknown at this time. See response to previous comment regarding coordination with ZOAM.
#7441	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.1.1., 3 & 4. USES IN OPEN SPACE. How will Uses in open space be applied for ZOAM-2020-0002, specifically, will the restrictions and standards only apply to "open space lots" or will PFLs (prime farmland lots) and RELs (Rural Economy Lots) have similar or the same requirements?
#7913	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/25/2022	Duplicate comment. See response to comment # 7443
#7440	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.1.1., 3 & 4. USES IN OPEN SPACE. The list of uses permitted in open space under private ownership and HOA ownership include agriculture. However, as discussed with Uses and Use-specific standards, some uses categorized as "Agricultural uses" are significantly more "high-intensity" than others. Blanket permitted use on open space for some uses should be consistent with the Use and Use-specific standards requests to evaluate based on HIGH-INTENSITY USE impacts (traffic, noise, lighting, etc.). How will high-intensity uses be addressed?
#7914	7.02 Open Space Standards

ID	Section
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	Similar comment by other ZOC member regarding meat processing. May need further limitations of uses or exceptions.
#7439	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.I OPEN SPACE STANDARDS. Uses in Open Space. Why are botanical gardens or nature study areas permitted on HOA land, but not the other land types mentioned? Shouldn't they also be allowed on private parcels?
#7915	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	This use list taken directly from use list in current ordinance for uses permitted in common open space in TR districts.
#7438	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.H OPEN SPACE STANDARDS. Type specific open space standards. Trails. Could this language be clarified? It appears that if land is not dedicated to the county, or it is not included within the boundary of the parcel owned by an HOA or individual, then the path must be provided by an easement. Is that correct? If so, would that preclude land within an HOA from providing a path via an easement?
#7916	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	Interpretation is correct and it would NOT preclude land within HOA from providing a path via an easement.
#7437	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.H OPEN SPACE STANDARDS. Type specific open space standards. Trails. Why doesn't this section include any considerations for the linear parks portions of the Linear Parks and Trails plan? Why doesn't this section include any of the LPAT design elements related to wildlife corridors, native vegetation, and environmental protection?
#7917	7.02 Open Space Standards

ID	Section
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	Even though they are not mentioned they are not prohibited. Design elements are included in the LPAT with a conscious decision not to reproduce them here.
#7436	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.H.6 OPEN SPACE Design Standards. Trails. Why does this section not include or reference equestrian trail requirements?
#7918	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/25/2022	Likely an oversight on the part of the staff. Equestrian trails may be inappropriate in urban areas for obvious reasons which may have contributed to that oversight. Staff will look for appropriate location to specify inclusion of equestrian trails in certain areas and exclude elsewhere.
#7435	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.H.5. OPEN SPACE PEDESTRIAN & BICYCLE NETWORK. Why isn't a pedestrian and bicycle network, or similar amenity, required in the Rural Policy Area?
#7919	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Pedestrian and bicycle trails were initially specified in district requirements and only recently determined appropriate for inclusion here. They are not a district requirement. There is also a concern for conflict with FSM requirements in rural areas.
#7434	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.H.5. OPEN SPACE. Type-Specific Open Space Design Standards/Pedestrian and Bicycle Network. Glad to see inclusion of the LPAT Plan in the ZO. This reinforces the County's commitment! Kudos.
#7920	7.02 Open Space Standards

ID	Section
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Acknowledged and Thank you.
#7433	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.H.4.d.5.c. OPEN SPACE. Add to end "or sidewalk." Emphasis should be on all acceptable accessibility.
#7921	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Added or sidewalk to H5c believed to be the intent of comment.
#7432	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.H.1.g OPEN SPACE Design Standards. Is there a parameter somewhere for "well-drained?"
#7922	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	No. needs follow-up
#7431	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	"5.04.H.1.d OPEN SPACE DESIGN STANDARDS. Why must open space be centrally located? How is centrally located measured? 5.04.H.2.a OPEN SPACE. Commercial or Employment Districts. Why must open space be centrally located? How is centrally located measured? 5.04.H.3.a. OPEN SPACE. Passive Recreation Space. Why must open space be centrally located? How is centrally located measured?"
#7923	7.02 Open Space Standards

ID	Section
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Deleted from H1 due to other comments. Will delete from H2 and H3 and add 1/4 mile mile as reasonable walking distance to ensure accessibility which was intent of central location.
#7429	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.H OPEN SPACE STANDARDS. Type specific open space standards. Why don't these type specific standards include mentions of contiguous habitat, wildlife travel corridors, native plant vegetation, etc. to achieve 2019 GP NEHR policies? At the least, shouldn't Section 3 "Passive Recreation Use" have these ecological considerations? The standard to "contain a variety of natural features" is extremely weak language considering that passive recreation uses are typically intended to connect people with nature.
#7924	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	No intention to exclude. Language can be strengthened.
#7428	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04 F. 5 OPEN SPACE STANDARDS. Why is a credit for meeting minimum open space requirements given for meeting other requirements of the zoning code?
#7925	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Double dipping is not unheard of or always disallowed. Meeting all standards separately can occasionally become burdensome. This section probably needs revision to be more specific and apply to overlapping with environmental and natural resources.
#7427	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.F.1.b. OPEN SPACE Standards & Type-Specific Open Space Design Standards/Outdoor Gathering Space. Amenities on parcels greater than [TBD] must include restrooms at regular intervals or those must be in close proximity and open the public. PRCS and NOVA Parks, including the W&OD Trail, already are providing this necessary amenity. Have PRCS and NOVA Parks been asked to determine the appropriate interval?

ID	Section
#7926	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	Section references aren't clear. However, PRCS and NOVA have not provided review, yet.
#7426	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.F OPEN SPACE STANDARDS. General Open Space Design Standards. Aside from one reference to RSCR, why are there no standards pertaining to wildlife travel corridors, native vegetation, or ecological services that open space should provide (to comply with the 2019 GP)? Why is the only consideration for landscaping (bullet 2.b) for "enjoyment and shade"? Shouldn't landscaping be required to incorporate ecological value (ie native plants)?
#7927	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	These areas not intended to be excluded just because they are not mentioned specifically. Standards specifically for these are too specific for Zoning Ordinance and the jurisdiction of others.
#7425	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.E.2 OPEN SPACE STANDARDS. As noted, shouldn't native vegetation for pollinators be included? Also, in regards to bullet "e", the LPAT Framework Plan includes more than just pedestrian or bicycle trail considerations, shouldn't linear parks and wildlife corridors also be included as part of the LPAT Framework Plan considerations?
#7928	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	Staffs opinion would be that "native vegetation or pollinator habitat would be excessively difficult to maintain or monitor or describe in a protective easement.
#7424	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	"5.04.E.2 OPEN SPACE. PRIORITIES AND BONUS CREDIT. Indicates various ""bonus credit"" will be applied for various types of open space (e.g., prime ag soils, forest, trails, historic resources, etc.) Please provide an example calculation to show how the ""bonus credit"" is applied. How will the ""bonus credit"" be applied for ZOAM-2020-0002 calculation with open space for cluster subdivisions? [OR does 5.04.F.13 override all bonus credit for clustering?]"

ID	Section
#7929	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Application of anything to ZOAM would be premature. Intent would be not to create a standard or requirement that would "override" another unless specifically noted. Example of application of bonus credit: 15 acres of mature forest x 1.25 would receive credit for providing 18.75 acres of open space (1.25 x 15= 18.75)
#7423	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.E.1 OPEN SPACE STANDARDS. Are wetlands mitigation projects defined as a "water feature"? Shouldn't wetlands be explicitly added? Shouldn't wildlife travel corridors and native vegetation for pollinators also be included in contiguous habitats to protect against habitat fragmentation (and not just trees)?
#7930	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	Mature forest and "other areas not mentioned" should cover these. See other responses to concerns for native vegetation, pollinator habitat and wildlife travel corridors. A consensus could cause these areas to be added to the list.
#7422	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.D.3. OPEN SPACE CATEGORIES. PRIVATE. Why is privately owned land to which access is prohibited considered open space?
#7931	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	It can provide open space without providing access, for example prime soils on land being farmed and under an open space easement.
#7421	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.D.3. OPEN SPACE Categories/Private. Is there a requirement for signage designating the area as private to be considered such? Can there be?

ID	Section
#7932	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	If there is consensus that it is needed it could be added.
#7420	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.D.2. OPEN SPACE Categories/Public. While the categories apply to all Open Space, this one only applies to HOAs and "comparable" which rules out the public lands owned by the county and comparable governmental entities. Can this definition be expanded to include all public open space?
#7933	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	Do not agree that public lands owned by the County are ruled out but the language could be modified.
#7419	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04 D.1. OPEN SPACE CATEGORIES. COMMON. Given the stated purpose of the open space standards, why are sewer facilities considered common open space and calculated as open space in development?
#7934	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	Facilities themselves are not considered open space but some types are currently allowed in open space such as communal facilities in cluster subdivisions. This is a current permission carried over from existing ordinance. This is also the subject of current debate yet to be decided.
#7418	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.C.3.a OPEN SPACE STANDARDS. Natural, Environmental, and Heritage. How will man-made landscapes that have "gained importance" be defined? Shouldn't wildlife and/or habitat evaluations be used as criteria (to be evaluated by ecologists and biologists)? This would help define "exemplary natural communities, habitats, and ecosystems" mentioned in the 2019 GP NHR 6.2. At the least, shouldn't wetlands mitigation projects be included? Shouldn't this also include species of greatest concern from the Virginia Wildlife Action Plan?

ID	Section
#7935	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	All legitimate concerns that can be considered in additional language.
#7417	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.C.3 OPEN SPACE STANDARDS. Natural, Environmental, and Heritage. In addition to contiguous forests, shouldn't wildlife travel corridors, and native plant and pollinator habitat also be included to comply with 2019 GP policies (especially NHR 6.2, but also FTV 4 and NEHR 1)? Shouldn't this also include language to protect viewsheds the County's scenic rivers (2019 GP HASR 5.2.O)?
#7936	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	GP policies will be reviewed for specific guidance.
#7416	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	"5.04.C.1 OPEN SPACE STANDARDS. Recreation. These definitions are different from previous definitons. Have other sections been updated to reflect these changes? While the added language could be helpful in defining these uses, there is still room for ambiguity. For example, would hiking along a boardwalk be a passive recreation use? While hiking is a passive recreation use, a guided nature walk would be a group activity that would require ""equipment designed specifically for the activity"" - with the equipment being the boardwalk. It seems that more clarity may be needed to avoid confusion. Also, how do these definitions, and uses listed, conform to the LPAT Framework Plan (in relation to defining the terms, but also allowing particular uses)? "
#7937	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	These are not standards they are summarized descriptions from the GP to assist in understanding the goals of open space. They are also not definitions. Acknowledge your example of ambiguity. There is room for clarifications if needed.
#7415	7.02 Open Space Standards

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.C.1. OPEN SPACE Types/Recreation. Definitions of Active and Passive Open Space were majorly changed from current ZO. Focus proposed is now on the activities involved (versus the amount of land development involved for the activity). Kudos.
#7938	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	Thanks for the kudos. These are meant to reflect GP.
#7414	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	5.04.B.2. OPEN SPACE, CALCULATION. States that "any portion of the parcel that may be included in an easement" would be excluded from the gross acreage used in calculation. Can you be more specific for what TYPES of easement (utility, conservation, development, open space, etc.)?
#7939	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	As also stated in B.2 "that would prevent use as part of the development or open space." Actual easement language would have to be provided and reviewed.
#7412	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/18/2022	"5.04.B OPEN SPACE, CALCULATION. States, ""Open Space is calculated by multiplying the required percentage as provided in the district requirements specified in Chapter 2, Zoning Districts by the gross acreage of the subject parcel or combined parcels."" However, ZOAM-2020-0002 (Cluster/Prime Ag Soils) is proposing an overall 70% that is split between farming lots (PFLs) Rural Economy Lots (RELs) and Open Space -- which appears to get the ""leftover"" area after PFL and REL. How will that ZOAM be compliant with this ZO requirement?"
#7940	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/26/2022	As noted in reply to other comments, progress of ZOAM is being monitored and ZOAM and ZOR will be aligned where necessary.

ID	Section
#7411	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	5.04.A.5.a OPEN SPACE. APPLICABILITY. How do and will these standards apply to ZOAM-2020-0002 for consistent application?
#7941	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	As noted in reply to similar earlier comments, progress of ZOAM is being monitored and one or the other will be aligned to eliminate conflict.
#7410	7.02 Open Space Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/18/2022	"5.04.A.5.a OPEN SPACE. APPLICABILITY. States, ""Piecemeal applications that result in the approval of more than 4 dwelling units without the required open space when it would have otherwise been required if the applications had not been submitted separately, will be required to provide the required amount of open space on any future development application."" This looks like a known loophole. What is the enforcement/consequences other than, ""Don't do it again next time?"""
#7942	7.02 Open Space Standards
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/26/2022	It isn't a known loophole, just a prediction of an attempt to avoid providing open space. The consequence will be that the required open space for the previous 4 units will be provided with the application for dwelling unit #5.
#7406	7.02 Open Space Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date: 1/18/2022	With regard to LPAT trails: Does the Plan require that all trails will be 'accessible'? These sorts of trails are not required everywhere in the National Park system, nor should they be required in Loudoun. There are places where building such trails will not be practicable, nor desirable from an environmental point of view. Strike or drastically amend 5.04.H.6.b. Footpaths should be completely acceptable for the LPAT where constructing accessible trails are not reasonable to build. This should be the case in Open Space too.
#7943	7.02 Open Space Standards
By: Steve Goodrich Tags: staff	The overarching intent is to be compliant with ADA requirements. Not prepared to justify or explain why Loudoun should not be compliant.

ID	Section
steve.goodrich@loudoun.gov Date:1/26/2022	
#9979	7.01.02 Lot Requirements
By: Packie Crown Tags: zoc pcrown@bowman.com Date:5/11/2022	The provisions of this section will increase the cost of housing in Loudoun County.
#7495	7.01 Site Development
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/19/2022	Need to address pipestem lots. referenced in FSM but not in ZO
#7549	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	See response to #7494 in 7548
#7494	7.01 Site Development
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/19/2022	Lot definitions need to include Pipestem lots. The FSM discusses pipestems and references ZO, but there is no definition or discussion of pipestems in ZO and thus review by zoning & B&D is a challenge
#7548	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	Acknowledged and agreed, pipestem reference in FSM is "pipestem driveway" with a definition. Only one reference to pipestem lot, not driveway, in ZO, regarding limits on paved parking in yards. Needs definition or deletion and link to FSM.
#7365	7.01 Site Development
By: John Merrithew Tags: zoc Date:1/17/2022	H. 2. e. Accessory buildings. I find the language confusing. Can you illustrate how the standards apply?

ID	Section
#7392	7.01 Site Development
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	We will revisit the language and try to clarify. We are currently trying to determine which sections need illustrations, so we will flag this one.
#7364	7.01 Site Development
By: John Merrithew Tags: zoc Date:1/17/2022	G. Seems unnecessary when each district will determine how density is measured.
#7442	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/18/2022	This section carried over verbatim from existing Ordinance and will be considered for revision or deletion.
#7363	7.01 Site Development
By: John Merrithew Tags: zoc Date:1/17/2022	F. 1, 2, and 3 seem to be repetitive. They refer to road dedications and public uses and have similar qualifiers. Seems they could be consolidated. What is the purpose of the Board review of the density and what criteria will they use to evaluate a request for density credit? Sounds like they are simply back checking the zoning administrator's calculations.
#7450	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/18/2022	These sections carried over verbatim from existing Ordinance and may be considered for revision or consolidation. However repetition may be necessary due to the unique requirements of each section for the unique situation. Regarding Board review of density credit it would seem to be a routine concern and decision since the uses are public. For additional consideration if revisions are made.
#7362	7.01 Site Development
By: John Merrithew Tags: zoc Date:1/17/2022	E. d. 3.this section seems unnecessary. Seems to repeat the previous subsection except for the 80% clause. What is the purpose of the 80% clause?
#7430	7.01 Site Development

ID	Section
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/18/2022	This section carried over verbatim from existing Ordinance and will be considered for revision or deletion. Additional research is needed to determine the purpose of the 80% reference.
#7361	7.01 Site Development
By: John Merrithew Tags: zoc Date:1/17/2022	E. c. Width measurement. Suggest requiring the lot width to be measured at the rear of the front yard and measured parallel to the street. There seems to be a lot of text that confuses the issue. The street line measurement with limits on the street radius, and frontage width seem very suburban and seem to require large lots. How do we accommodate larger cul de sacs?
#7413	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/18/2022	This text carried over verbatim from existing Ordinance and will be considered for revision. Additional research needed to determine if a separate regulation for cul-de-sacs with radii greater than 90' exists.
#7360	7.01 Site Development
By: John Merrithew Tags: zoc Date:1/17/2022	E. b. Just want to make sure tenant housing is an accessory dwelling and can be located on the same lot as another dwelling, and that a farm principal use includes a dwelling.
#7401	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/18/2022	This text carried over verbatim from existing Ordinance and will be considered for revision or deletion.
#7359	7.01 Site Development
By: John Merrithew Tags: zoc Date:1/17/2022	D. Are there other road classes? If there are public roads that we do not permit access? Suggest a use must have access to a public road or an approved private access easement.
#7393	7.01 Site Development
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	The revision has been made to "public" road, which staff are working on defining.

ID	Section
#7358	7.01 Site Development
By: John Merrithew Tags: zoc Date:1/17/2022	C.Is there a reason we are still referring to yards and setbacks? I never understood the difference. Is C. Setting a standard? Not clear. I assume where multiple yards, setbacks and buffers are called for, the widest shall apply.
#7394	7.01 Site Development
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	Look at correct terminology. Maybe Ag structures vs barns & farm buildings?
#7357	7.01 Site Development
By: John Merrithew Tags: zoc Date:1/17/2022	B. Exemptions - most exemptions are vertical tower-type uses except barns and farm buildings. The term farm buildings seems very broad. Does the State Code exempt these buildings from local zoning? Is a farm house a farm building? Do we need barns and farm buildings both listed?
#7395	7.01 Site Development
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/18/2022	Changed to agricultural buildings. These are not exempted from State Code. A single family dwelling is not an agricultural building. We will seek to clarify this where it occurs within the ZO.
#7256	7.01 Site Development
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	5.01 SITE DEVELOPMENT TERMS. E.1.b.1. Does this address the prior issues with the definition of Country Inn?
#7550	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	Would need more information on the "prior issue". Accommodations at Country Inn not considered dwelling units. Does this refer to a dwelling unit for a caretaker on same site as the Country Inn.
#7255	7.01 Site Development
By: Maura Walsh-Copeland Tags: zoc	5.01 SITE DEVELOPMENT TERMS. F.2.a Density Calculation, Floor Area states? "the terms "lot" and "lot area" may include all adjacent parcels owned in

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date: 1/16/2022</p>	<p>common and which are the subject of an approved unified concept development plan specifying the allocation of density calculated pursuant to this section." Does this concept apply to calculation of density THROUGHOUT the ZO, including cluster subdivision?</p>
#7405	7.01 Site Development
<p>By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/18/2022</p>	<p>This text carried over verbatim from existing Ordinance and will be considered for revision if needed. This text also needs further research to address the question. However, with regard to the question of application in cluster subdivisions, they would usually be residential and not subject to FAR</p>
#7216	7.01 Site Development
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 1/15/2022</p>	<p>H.2.e.3.d. There are many garages with office space above. Suggest barring bedrooms and kitchens. That alone should solve the problem.</p>
#7551	7.01 Site Development
<p>By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/20/2022</p>	<p>Will revisit and determine if revision is needed. Regulation refers to conversion of "Garage" while comment seems to apply to 2nd floor conversion. Requirement may need revision to address both levels.</p>
#7215	7.01 Site Development
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 1/15/2022</p>	<p>H.2.e.3. "Attached garage" is not currently a defined term. Historically an attached garage was a separate structure from a house, with four walls of its own. Now, though, homebuilders incorporate garages into the house itself. This makes the house seem larger and thus more marketable. This provision needs to be re-thought to reflect this reality.</p>
#7552	7.01 Site Development
<p>By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date: 1/20/2022</p>	<p>We will re-evaluate to determine continued applicability.</p>
#7214	7.01 Site Development
<p>By: Charles Houston Tags: zoc</p>	<p>2.3.3.a. This needs to be rewritten to be clearly understood.</p>

ID	Section
CharlesHouston3@yahoo.com Date:1/15/2022	
#7553	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	Section reference is assumed to be 2.e.3.a and will be reviewed to determine if it can be clarified.
#7213	7.01 Site Development
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	H.1.k Bus stops should be only for residents of the welling.
#7554	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	As written, comment may need address in a different section if the intent is to limit use rather than placement in a yard or term may need revisit.
#7212	7.01 Site Development
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	H.1.f seems to prohibit old-fashioned front porches, which we should encourage. Suggest going to 10', or somehow revising this standard.
#7555	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	We will revisit to determine if revision is needed. For consideration, this section is allowing projection into yard max of 3 ft. but does not prohibit deeper porch behind front setback.
#7211	7.01 Site Development
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	H.1.b. These ground-level improvements are by definition, at ground level. That means a height of 0-inches, not 30 inches.

ID	Section
#7556	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	Ground level may need definition. There will be situations where portions of deck will be ground level and others above ground level due to changes in elevation of lot. Ground level/30 inches may also be related to building code requirements for railings. Will research and evaluate as needed.
#7210	7.01 Site Development
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	H.1.a Four-board farm fences are typically 4' high. Suggest specifically excluding fences on farms. ("Farm" is not defined in old ZO. Defining it properly in the ZOR will probably be helpful elsewhere.)
#7557	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	This provision appears to allow all fences in all yards with a height restriction on only residential fences, N/A to true farm fences. However, definition of "farm" may be appropriate.
#7209	7.01 Site Development
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	H.1.a With our rolling topography, many homeowners will want privacy fences that exceed the 3.5 foot limit in this section. At least allow the ZA to permit taller fences (up to 6') if appropriate.
#7558	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	This requirement only limits fence height in residential front yards. It can be re-evaluated, however, the effect and appearance of 6 foot fences in residential front yards needs to be considered. Include criteria for ZA to use in considering if this is going to be revised to allow.
#7208	7.01 Site Development
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	E.1.e.1 might be construed as requiring all house frontages to be exactly parallel to the street. In turn, that means all houses would be lined up as straight as little soldiers. Boring! Instead, we should promote a lot of variation in the orientation of houses.
#7559	7.01 Site Development

ID	Section
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	Comment is acknowledged and understood. This section is the simplest version of stating how to apply the minimum front yard. Encouraging variation of yards, which is clearly good, may be more appropriate in district language where it can be tailored to specific district goals and intent.
#7207	7.01 Site Development
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	E.1.d.3. Use ARN and ARS rather than the old AR-1 etc. district names.
#7560	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	Acknowledged. All district and section references will be updated to new district labels and numbering format.
#7206	7.01 Site Development
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	E.1.b. "Dwelling unit" is the wrong term unless the new ZO has different definitions than the existing ZO: Under the old ZO, "dwelling units" mean one room with cooking facilities. More broadly, there are 11 different types of dwellings in the old ZO.
#7561	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	We will continue to evaluate this section that was borrowed from another jurisdiction to determine if it is appropriate to retain in light of current multiple dwelling unit types.
#7205	7.01 Site Development
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	E.1.a Scaling should work here - Large parcels should have more flexibility than smaller parcels. Example: 20 or 40-acre base density should have only one principal use. 80-acre parcels can have more than one such use. And so on.
#7562	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov	For further consideration, this comment is similar in nature to others received on same subject.

ID	Section
Date:1/20/2022	
#7204	7.01 Site Development
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022	E.1.a This is confusing: "Where two or more principal uses are located on one parcel, the required parcel size must be the is the larger of two or more uses requirements, and not the sum of all the minimum lot sizes."
#7563	7.01 Site Development
By: Steve Goodrich Tags: staff steve.goodrich@loudoun.gov Date:1/20/2022	Agreed. There is a typo which has been corrected. See tracked change.
#7635	Chapter 7: Development Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	Will there be any sustainability development or performance standards? I see nothing for energy efficiency requirements, solar incorporated into building or parking lot requirements, LID or green infrastructure/stormwater management BMPs that go above and beyond existing requirements. Am I missing something?
#7946	Chapter 7: Development Standards
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	You aren't missing anything, but we would like suggestions where you feel some of these measures are most appropriate.
#7302	Chapter 7: Development Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/16/2022	"Observation submitted by Save Rural Loudoun: 1. Entire 5.04 and the rest of the ZO References to "districts" are confusing. a. In the current and draft ZO, the word "districts" refers both to zoning districts defined in the GP and to "special and overlay districts" defined in Article 4 of the ZO. b. In the current ZO, dimensional standards only appear to apply to specific "special and overlay districts," not to entire zoning districts. c. Some parts of draft 5.04 appear intended to apply to general by-right subdivision options in entire zoning districts, not just to the individual "special and overlay districts" listed in Article 4 of the ZO. d. This makes it difficult to tell which type of "district" Section 5.04 (and other sections) are referring to. e. To avoid confusion with the broader category of zoning districts, it would be helpful to re-label "special and overlay districts" as "planned developments." All the subsections of Article 4 of the current ZO are labeled "planned developments.""
#7947	Chapter 7: Development Standards

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Noted. Staff will attempt to clarify those concerns.
#13870	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.03.04-1 Rare, Threatened and Endangered Species, and species of greatest conservation need protection standards countywide in all zoning districts, not just in RSCR, Very and Moderately Steep Slopes. Add where appropriate.
#13863	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.03.04.A. Limit blasting for purposes intended to make a site more suitable for development. B.2.Blasting conditions are provided for sanitary sewer and water lines. Other reasons for blasting (to make a site more suitable for development) should be prohibited.
#7637	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	It appears that the FOD does not prohibit stormwater detention or retention ponds, and I missed this earlier. Either in RSCR or FOD that should be avoided per EPA. This includes dry or wet detention ponds. Note the following on wet ponds; other information is also available on the best siting of dry ponds: The placement of ponds or wetlands, especially large regional facilities, in low-lying areas may harm natural wetlands or existing riparian habitats. Siting ponds or other structural management practices within natural buffer areas and wetlands degrades their functions and may interrupt surface water and ground water flow when soils are disturbed for installation. In addition, during large rain events, breaches of large wet ponds can cause downstream erosion and degradation due to high volumes and velocity of the discharge (EPA, 2005b).
#8017	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	In the FOD, stormwater infrastructure is only permitted for uses that are permitted in the FOD We will contemplate further protecting with standards in the RSCR.
#7636	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/22/2022	B.1.Roads, etc. Is there any requirement for roads to be perpendicular in stream crossings (here or in the FSM)?
#8018	6.04 Development, Land Disturbance, and Additional Use Specific Standards

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	For Floodplain, Major, yes but that is a good point that it could be required for all streams. Staff will contemplate revising text to add this requirement.
#9558	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:4/8/2022	I cannot find where this is a zoning regulation here. Is perpendicular for major floodplain an FSM requirement?
#7164	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	In the table 5.03.04-1 item 9 uses the term "fully" permeable. Please remove the word "fully". It's creating an unclear standard that isn't enforceable.
#7451	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	text has been rewritten to clarify that fully permeable means permeable to stormwater.
#6981	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/5/2022	This gives performance standards for SWM BMPs, is this to assume that is permitted within the NERS? It may be necessary to add this to the Use table in 5.03.03. Currently there is much confusion about SWM permissions in 50's management buffer, etc... this should be clarified in the use table.
#7452	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	local and regional SWM BMPs are allowed within the minor floodplain of the RSCR.
#6956	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:1/4/2022	2. Public Sanitary Sewer and Water Line Standards. I. Does the VA E&S Control handbook require the use of soil stabilization blankets and matting above a certain percentage of slope? If not, can Loudoun require these measures? Both natural and man-made/altered development slopes will experience erosion failure with rain events without more protective measures than just seeding and straw.

ID	Section
#7453	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	The specific requirement for public sanitary sewer and water line standards within the RSCR or very steep slopes applies to any disturbed areas for this use.
#6955	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	2. Public Sanitary Sewer and Water Line Standards. k. 2. What am I missing? While it's good that 2 rows of super silt fence must be installed, why would the inner row not have to have filter fabric? Isn't the point increased erosion protection?
#7454	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	We will consider if K2 is still a best practice
#6954	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	B. Additional Use Specific Standards in RSCR adjacent steep slopes and Very Steep Slopes. 2. Public Sanitary Sewer and Water Line Standards. f. 1. e. has a typo- 6)
#7455	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Corrected. Thank you for pointing this out.
#6953	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	B. Additional Use Specific Standards in RSCR adjacent steep slopes and Very Steep Slopes. 1.e. The reference to "whichever is greater" could mean a whole lot more than 200 ft, correct? Instead could this be limited to a max of 200 ft. If an unusual circumstance exists, it could be waived.
#7467	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov	Ryan, I believe this is what the regulation already allows?

ID	Section
Date:1/18/2022	
#8022	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Yes, it could mean much greater. Staff will contemplate limiting to 200' and a waiver or similar extenuating circumstance provision.
#6952	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	B. Additional Use Specific Standards in RSCR adjacent steep slopes and Very Steep Slopes. 1d. and 2c. Both have very convoluted language that could be simplified to be easier to follow.
#7461	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	agreed. this language has been revised and restructured for clarity.
#6951	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	B. Additional Use Specific Standards in RSCR adjacent steep slopes and Very Steep Slopes. 1.c. Could this be rewritten to be easier to follow?
#7460	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	fixed a typo
#6950	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	10. Natural Heritage Resources. Guidelines should also apply to Moderately Steep Slope areas, as well as everywhere in the county.
#7458	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov	revised accordingly.

ID	Section
Date:1/18/2022	
#6949	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	9. Permeable Surfaces. Guidelines should apply to moderately steep slopes as well.
#7457	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	revised accordingly
#6948	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	8. Siting and Disturbance. These guidelines should also apply to Moderately Steep Slopes. Also blasting should not be allowed in moderate and very steep slopes directly along streams as it increases the potential for erosion into the stream.
#7468	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	please see previous response related to moderately steep slopes not being defined as RSCR.
#6947	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	7.Preservation of Existing Vegetation. This should also apply to Moderately Steep Slopes.
#7469	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Ryan, any thoughts on this?
#8021	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Ryan Reed	Also contemplating.

ID	Section
Tags: staff ryan.reed@loudoun.gov Date: 1/26/2022	
#6946	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Gem Bingol Tags: zoc gbingol@pecva.org Date: 1/4/2022	6. Revegetation. This should also be required on moderately steep slopes. All revegetation should be consistent with Chesapeake Bay Professional Certification guidelines.
#7470	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/18/2022	Ryan, and thoughts on this?
#8020	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/26/2022	See comment #6858 and my response. Staff is contemplating this during the revisions.
#6860	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.03.04.B.2.f.1 NATURAL & ENVIRONMENTAL RESOURCE DEVELOPMENT, Land Disturbance, and Additional Use Specific Standards. As part of protecting natural heritage resources, should state species of concern, or studies for exemplary natural communities, habitats, and ecosystems also be added studies requested by the Zoning Administrator? This should be universal, not just for this specific use in the RSCR, does Staff agree?
#6933	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/4/2022	Yes. While the list states "including, but not limited to:" staff agrees that these specific studies could and should be added here.
#6859	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com	"5.03.04.A NATURAL & ENVIRONMENTAL RESOURCE DEVELOPMENT, Land Disturbance, and Additional Use Specific Standards. The design standards of the LPAT Framework Plan should be codified in the Zoning Ordinance. If the

ID	Section
Date:1/3/2022	LPAT plan is going to be exempt from these use standards, how will the Zoning Ordinance ensure that the natural resource, environment, and wildlife habitat/corridor protections outlined in the LPAT Framework Plan will be implemented and enforced?"
#7456	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	The LPAT contains policy recommendations, not all of which can be codified under a zoning ordinance without corresponding, specific zoning enabling legislation under the Code of Virginia.
#6858	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.03.04-1 TABLE NERS DEVELOPMENT & LAND DISTURBANCE STANDARDS. 4-10. These are good standards. Why are they not also applied to Moderately Steep Slopes?
#7471	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Ryan, I added 9 and 10 to moderately steep slopes but i'm less sure about 5, 6, 7, 8. And 4 seems like a definite "no" to me.
#8019	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Staff have added 9 & 10, and will further contemplate the remaining standards for Moderately Steep Slopes.
#6824	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	2.k. "Super silt fence" sounds descriptive, but I assume the intent if for something prescriptive and defined. This comment holds true throughout the ZO draft: The language needs to avoid terms-of-art, techniques and products unless there is a definition. If the intent is cite something specific, then elaborate enough to make the intent clear.
#6928	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/4/2022	acknowledged. we will consider defining a super silt fence, aligning with the VESCH.

ID	Section
#6823	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	3.a should define "heavy equipment." Otherwise it's vague.
#6929	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/4/2022	acknowledged. we will consider a definition for heavy equipment.
#6822	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	B.1.c is not clearly written
#6934	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Agreed. When we combined the RSCR and SS development standards, we discovered we needed to add the newly defined RSCR term "adjacent steep slopes" however, this addition creates confusion. Marked for follow up so that we can work on an appropriate revision.
#7459	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	fixed a typo
#6820	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:12/31/2021	There is something wrong with 5.03.04.B.1.d. Perhaps it's just the word 'not' in the 5th line.
#6935	6.04 Development, Land Disturbance, and Additional Use Specific Standards
By: Ryan Reed Tags: staff	Agreed. We meant the opposite. Corrected.

ID	Section
ryan.reed@loudoun.gov Date: 1/4/2022	
#9742	6.03 NER Use Table
By: William Junda Tags: zoc bjunda@gordon.us.com Date: 4/22/2022	Shouldn't the infrastructure table include BMP/SWM for uses permitted in the floodplain (including major floodplain)? Shouldn't it also include Stream Restoration projects in major floodplain (stream restoration projects aren't viable in minor floodplain)? Stream restoration is supported by the Comp Plan and is an MS-4 compliance options for the County
#7163	6.03 NER Use Table
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date: 1/12/2022	In the Other area all three items should be P in the RSCR area.
#7465	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/18/2022	staff will consider these uses within the context of the use table for RSCR provided in the 2019 GP.
#7162	6.03 NER Use Table
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date: 1/12/2022	Conservation, including stream restoration should be an S for Very Steep Slopes. Allow the opportunity to contemplate minor infringements to create enhanced conservation, nature, mitigation opportunities. Making it not permitted eliminates the opportunity to explore positive things.
#7382	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/18/2022	Conservation has been switched to "P" for very steep slopes.
#7161	6.03 NER Use Table
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date: 1/12/2022	Open space must be a P in RSCR
#7383	6.03 NER Use Table

ID	Section
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Open space has been made "P" within the RSCR.
#7160	6.03 NER Use Table
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	Parks should be a P in RSCR. Can't understand how they are not allowed.
#7384	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	This is a specific park that would be dependent on a very steep slope area (an example would be a ski park). Most other "conventional" park activities should be covered as other uses listed in the table such as "paths and trails" or "open space"
#7159	6.03 NER Use Table
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	Public crossings for Trails, etc. in very steep slopes should be allowed somehow. Make it an S, but for example the bridging of a steep slope area to build the Greenway should be able to be considered.
#8016	6.03 NER Use Table
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Staff will contemplate this suggestion during text revisions.
#6986	6.03 NER Use Table
By: John Merrithew Tags: zoc JOHN.MERRITHEW@LOUDOUN.GOV Date:1/5/2022	5.03.03 permits various parks if the use is "dependent on RSCR or very steep slopes. Why use the term "dependent" and what does it mean? Seems very restrictive. I assume parks do not require a steep slope or floodplain but they can take advantage of them. Similarly Terms like "when no other alternatives are available or feasible" seem vague and subjective.
#7385	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	This description is not specific but is intended to cover a range of parks that might require a steep slope for the park activity. An example might be a ski park or rock climbing park.

ID	Section
#6979	6.03 NER Use Table
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/5/2022	5.03.03 NERS Use Table: Why are "Open space, and other conservation uses" not permitted in the RSCR? This space is exactly Open space per the definition. BY this language you wouldn't be able to count it as open space at time of site plan.
#7464	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	agreed. open space has been added as "P" within the RSCR.
#6940	6.03 NER Use Table
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	Allowing all underlying uses in the suburban area means much greater potential for intense development that would defeat the purposes of protecting the slopes. Generally the streamside slopes are a mix of moderately steep and very steep slopes, making more intense development likely to have a detrimental impact. In these limited areas, it's more reasonable to only allow the base density level of development and not allow special exception and minor special exception uses if the goal really is to protect the sensitive resources per the purpose of this section.
#7386	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	staff can consider additional standards, particularly; extending protections to moderately steep slopes originating within 50 feet of a floodplain (similar to the RSCR protections for very steep slopes as "adjacent steep slopes"). However, the 2019 GP specifically only defines RSCR adjacent steep slopes to include very steep slopes.
#6932	6.03 NER Use Table
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	5.03.03 NERS Use Table Paths and trails, including footpaths, biking or hiking paths, and horse trails and raised public boardwalks should have designated distances that they are permitted parallel to streams, in addition to the surface material. A nature trail/footpath that is no more than a single track around a foot wide is much less impactful than most bike or horse trails. Location of boardwalks along streams should also be carefully considered if they could be subject to inundation and the force of flooding.
#7387	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	specific provision or recommendations for a recommended distance, type or width of trail, and boardwalk locational criteria are welcome, particularly within the context of the LPAT policies and system plan.

ID	Section
#6857	6.03 NER Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	"5.03.03 NERS USE TABLE FOOTNOTE 2 indicates, ""All Minor Special Exception and Special Exception uses listed in the underlying zoning district, and overlay district if applicable, may be permitted within moderately steep slope areas by the Board of Supervisors by separate Special Exception approval of this Section 5.03.xx, and if approved, may be subject to certain conditions, pursuant to the provisions of Section 7.09."" This is the PRIMARY justification for separate use lists for MDOD, LOD, FOD, etc. that specifically DO NOT INCLUDE SPEX or Moderate SPEX uses that would violate the intent and purpose of the 2019 Comp Plan. "
#7466	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/18/2022	Ryan, any thoughts on this? My thoughts are the 2019 general plan provides no specific use limitations within moderately steep slopes, but there may be a better more technical answer here.
#8015	6.03 NER Use Table
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/26/2022	Staff need more context, any SPEX or SPMI (minor SPEX) are evaluated by staff during review in terms of plan policy. If the comment is: Chapter 4 sections should have separate use lists and tables like this, staff will discuss and contemplate.
#6856	6.03 NER Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.03.03 NERS. USE TABLE: Why, if water, sewer, roads and driveways are permitted on steep slopes, are planting native vegetation, historic and archaeological (studies), and conservation and scientific research not permitted?
#6922	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/4/2022	These uses have been clarified as permitted within very steep slopes.
#6855	6.03 NER Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.03.03 NERS. USE TABLE: Are the uses on very steep slopes in the 25% area under "Purposes" for this section allowed? Does this mean a blanket permit for them would also be allowed without review?

ID	Section
#7463	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	only principal uses and activities listed as permitted or SPEX under table 5.03.03 would be permitted within the very steep slopes areas. Ordinance requirements (such as parking, or other FSM requirements) and accessory structures and uses associated with a specified principal use would still be required and/or allowed unless explicitly prohibited here.
#6854	6.03 NER Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.03.03 NERS USE TABLE - CONSERVATION AND PRESERVATION. Why are Planting Native Vegetation and Historic and Archaeological Sites not permitted uses in Steep Slopes?
#7462	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	agreed. these have been added in very steep slopes.
#6853	6.03 NER Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.03.03 NERS USE TABLE - RECREATION. Why are there not additional specific standards to protect buffers for river and stream health and wildlife habitat?
#6925	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/4/2022	Please recommended specific standards for the Recreation uses allowed within the RSCR. FAR limitation (specific percentage), parking limitation (specific rate), lot coverage (specific percentage)?
#6852	6.03 NER Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	"5.03.03 NERS USE TABLE: INFRASTRUCTURE. Paths and Trails...and Raised Public Boardwalks. There should be extra protections to ensure there is adequate space for the infrastructure/recreation use while protecting buffers for river and stream health including wildlife habitat. Design standards from the LPAT Framework Plan could be incorporated here. Protecting the environment and natural resources should be the primary objective for this section. Why are there not additional specific standards to protect buffers for river and stream health and wildlife habitat?"

ID	Section
#6821	6.03 NER Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/2/2022	Agricultural uses, permitted on steep slopes, should tie to the precise definition in Virginia Code 3.2.300 (Right to Farm Act,) which clearly defines agriculture and silviculture. If this is not done, a variety of uses that are not true agriculture but are under that heading in this draft ZO may assert that they are Permitted uses here. Examples: Restaurants, Farm Machinery Repair, and others.
#6927	6.03 NER Use Table
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Agreed. Staff is working with the CAO to ensure our regulations and definitions align with state code.
#7389	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Agreed. An agricultural definition or language with similar criteria to Section 5.03.02.B.2. for Steep Slopes will be added.
#6819	6.03 NER Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:12/31/2021	Exemptions in 5.03.01 relative to existing buildings would seem to be contradicted in the last section of the NERS Use Table, which seems to indicated expansion is not permitted in the RSCR.
#6930	6.03 NER Use Table
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Agreed. We will revise to align existing structures in RSCR to 5.03.01 while maintaining the language in Steep Slopes (which is what appears in the table).
#7388	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	agreed. we will clarify expansion for the RSCR column.
#6818	6.03 NER Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com	OK, so now I see P1/S1 in the filled Moderately Steep Area. That's even more confusing. Which is it, P or S? How is one to know?

ID	Section
Date:12/31/2021	
#6835	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/3/2022	Thank you for finding this. This should say P1/S2, which references footnotes 1 and 2 provided at the bottom of the table. Corrected.
#6817	6.03 NER Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:12/31/2021	Seems paths and trails should be permissible on Very Steep Slope Areas with guidance for construction and maintenance. After all, such trails are permitted all the time in parks and forests, Federal, State and otherwise. So, why not here?
#6945	6.03 NER Use Table
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	That was an oversight, paths and trails have been added as "permitted" under Infrastructure for VSS.
#6815	6.03 NER Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:12/31/2021	In the NERS Use Table, why is the Moderately Steep Slope Areas column filled with solid a color? What does that mean, in contrast to the Very Steep Slope Areas column, which has designations in it or left blank, when a use is not permitted?
#6931	6.03 NER Use Table
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/4/2022	P1/P2 and corresponding footnotes 1 and 2 explain that all underlying permitted uses are permitted within moderately steep slopes, which is the same as currently allowed for moderately steep slopes under the current R93 ZO.
#13852	6.02 Steep Slope Areas
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	5.03.02.D. Uses and activities Do not permit density increases allowed by the underlying zoning for steep and very steep slopes adjacent to streams and require strict conditions on blasting under limited circumstances on anything besides extension of utilities.
#11020	6.02 Steep Slope Areas

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.03.02 STEEP SLOPES 2022 Round 3 Input: Indicates no land disturbing activities but then indicates "Encourage innovative and imaginative building techniques to create structures and site plans that are suited to sloped terrain." This seems to suggest developers can develop in the steep slope areas provided they are innovative and imaginative. This sentence should be deleted."
#11018	6.02 Steep Slope Areas
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.03.02 STEEP SLOPES. APPLICABILITY & EXEMPTIONS. B.2.a states, ""Single Family Dwelling on Existing Legal Lot. Construction of a single residential use on a legal lot existing as of June 16, 1993, is exempt from the requirements of Section 5.03.02.D. Such exemption does not apply to nonresidential uses. Development on such lot is subject to all applicable standards provided in Section 5.03.04."" The only thing that has changed from current zoning is the date, which still indicates that the steep slopes protection is ruled null and void if the lot existed 30 years ago. The primary issue is that many of the ""lots of concern"" are the old wood lots on the Short Hill, Blue Ridge, and Catoctin Ridges, which are the areas that tend to have the most steep slopes. If the new Zoning Ordinance does not protecting those slopes -- probably our most sensitive and most important to protect -- what are we protecting? The logic is similar to the prime ag soils question -- ""protecting"" the asset as long as the residential development potential is still allowed to supersede any agricultural or environmental concern. Staff Response: That is a good point, especially as we see less available, or more easily developable lots. It is important to note that the exemption is only for 5.03.02.D - which prohibits land disturbance except for a limited amount of uses. These lots are still subject to the standards that are now in 5.03.03. Regardless, removing this exemption has been considered, in the past, a ""taking"" and therefore avoided. Additionally, the Board has clarified their direction with the ZOR to not change the density in western Loudoun. We will further discuss internally" STATUS?
#11017	6.02 Steep Slope Areas
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"5.03.02.B.2.b. STEEP SLOPES. APPLICABILITY & EXEMPTIONS. Timber Harvesting. Does the County ensure or monitor the requirement below and ENFORCE when presented with KNOWN violations? (Recent examples know to the ZOR Project Manager indicate the answer may be no and need to be addressed.) Section 10.1-1181.2.H of the Code of Virginia. Prior to completion but not later than three working days after the commencement of an operation, the operator shall notify the State Forester of the commercial harvesting of timber. . . . The notification may be verbal or written and shall (i) specify the location and the actual or anticipated date of the activity, (ii) include an owner's name or the owner's representative or agent and contact information, and (iii) be provided in a manner or form as prescribed by the State Forester. If an operator fails to comply with the provisions of this subsection, the State Forester may assess a civil penalty of \$250 for the initial violation and not more than \$1,000 for any subsequent violation within a 24-month period by the operator. Such civil penalties shall be paid into the state treasury and credited to the Virginia Forest Water Quality Fund pursuant Staff Response: The County has an open communication with Virginia Department of Forestry (DOF), and tracks all timber harvests, however, enforcement of Seciton 10.101181.2.H of the Code of

ID	Section
	Virginia is DOF's authority, not the County's. 2022 Round 3 Input: This is a known, ongoing communication and enforcement loophole that must be addressed, either through additional MDOD procedures or initiation of legislative request for coordination procedures between State (VDOF, VDH, VDOT) and Loudoun County departments of Building & Development and Planning & Zoning."
#11015	6.02 Steep Slope Areas
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"5.03.02 STEEP SLOPES. APPLICABILITY & EXEMPTIONS. CLOSING B&D LOOPHOLES. Staff (including the ZOR Project Manager) are directly aware of instances where land is being cleared on Steep Slopes under the guise of a non-existing (or expired) ""Forestry Management Plan,"" after the County was made aware of the lack of VDOT entrance permits, with no applied for or approved grading permits or review for erosion, and attempts to use a third party ""soils report"" to obtain a farm management plan on property in conservation easement -- all with the directly knowledge of the ultimate development plans based on boundary line adjustment submission and county approval. Due to the KNOWN lack of communication and enforcement issues related to grading/clear cutting, and ignoring permits, how will these loopholes be closed with the new zoning ordinance for steep slope areas? Staff response: Indeed, staff are aware and have experienced ""loopholes"" and challenges with enforcement. Staff is working with the CAO to develop strategies, and the existing steep slopes exemptions represents the most contemporary starting point, with revisions adopted 12/2/2015 in effort to align with state code but address challenges realized in the 2000's. 2022 Round 3 Input: Staff aware of ""loopholes."" Must be addressed"</p>
#7226	6.02 Steep Slope Areas
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:1/15/2022</p>	5.03.02 I'd love to see that one purpose is to protect viewsheds from elsewhere.
#7379	6.02 Steep Slope Areas
<p>By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022</p>	Please provide additional context on how the steep slopes might protect viewsheds.
#6984	6.02 Steep Slope Areas
<p>By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/5/2022</p>	<p>Minimum Size of Steep Slope Area: does the 15' in width mean that if any part of the contiguous area is less then 15' that can count as a break in continuity? It should.</p>

ID	Section
#7377	6.02 Steep Slope Areas
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Ryan Doug and I had similar mapping decisions to make for the RSCR. I do not have the history on how steep slopes contiguity was determined. Do you know?
#8010	6.02 Steep Slope Areas
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	Yes. That is how it is displayed using the County's data in WebLoGIS and that what is accepted in data submitted to the County.
#6982	6.02 Steep Slope Areas
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/5/2022	Exemptions: While it is implied with the term "naturally occurring", I think exemptions should clearly state that "man-made" or "previously disturbed" steep slopes should be added to the exemptions.
#7378	6.02 Steep Slope Areas
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	This seems appropriate if the previously disturbed steep slopes are legally disturbed. Should we add language for this?
#8009	6.02 Steep Slope Areas
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	This was addressed in the previous revisions to the Steep Slope Standards, by revising the definition to what exists and is being carried over with the ZOR: Very Steep Slope Area: Naturally occurring land areas with slopes greater than 25%. The Steep Slope Standards do not apply to slopes created by permitted land disturbing activities, such as, but not limited to, building and parking pad sites; berms; temporary construction stock-piles; and road-side ditches.
#6926	6.02 Steep Slope Areas
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	C. Establishment of Steep Slope Areas. Protecting naturally occurring steep slopes should not vary based on zoning district, particularly in the suburban area, because the impacts of permitted density and intensity of development actually has more potential impact stream resources than in the transition and rural areas. Streams are equally affected, and ecosystem losses are inevitable in such situations. These areas are fairly limited and mostly along stream valleys--Goose Creek, Broad Run and Sugarland Run. There are not that many undeveloped areas where this is even applicable in eastern Loudoun--particularly along our streams. Is staff able to provide an estimate of the developable acreage, both including and apart from land along Goose Creek, Broad Run and Sugarland Run?

ID	Section
#7380	6.02 Steep Slope Areas
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	We would need to conduct a mapping analysis to determine the impact you have described. We can consider consolidating the minimum extent criteria.
#6918	6.02 Steep Slope Areas
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	2. Exemptions b. Agriculture Three questions: How is this enforced? What definition of agriculture applies? Is stockpiling included? Stockpiling should be disallowed in floodplains, riparian buffers, and on steep slopes where the potential for slippage and erosion are likely.
#8012	6.02 Steep Slope Areas
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	The agricultural exemption applies to those operations as defined in the state code. This section seeks to enforce this similar to the county's most recent enforcement of Forest Management Plans, with updated standards in the FSM, as well the Conservation Farm Management Plan. Stockpiling is a waste-related use, not permitted in the Rural Policy Area.
#6916	6.02 Steep Slope Areas
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	2. Exemptions a. Single Family Dwelling on Existing Legal Lot. As written, would this allow for residential development on lots that were designated as wood lots and were not planned for residential or other development? If so, it should be rewritten to clarify that that would not be allowed.
#7381	6.02 Steep Slope Areas
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	if a lot within a zoning district that permits single family residential uses has not been developed with a single family residential use, this exemption would allow for one even if the lot is currently a "wood lot".
#6851	6.02 Steep Slope Areas
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	"5.03.02 STEEP SLOPES. APPLICABILITY & EXEMPTIONS. Timber Harvesting. Does the County ensure or monitor the requirement below and ENFORCE when presented with KNOWN violations? (Recent examples know to the ZOR Project Manager indicate the answer may be no and need to be addressed.) Section 10.1-1181.2.H of the Code of Virginia. Prior to completion but not later than three working days after the commencement of an operation, the operator shall notify the State Forester of the commercial harvesting of timber. . . . The notification may be verbal or written and shall (i) specify the location and the actual or anticipated date of the activity, (ii) include an owner's name or the owner's representative or agent and contact information, and (iii) be provided in a manner or form as prescribed by the State Forester. If an operator

ID	Section
	fails to comply with the provisions of this subsection, the State Forester may assess a civil penalty of \$250 for the initial violation and not more than \$1,000 for any subsequent violation within a 24-month period by the operator. Such civil penalties shall be paid into the state treasury and credited to the Virginia Forest Water Quality Fund pursuant"
#8014	6.02 Steep Slope Areas
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	The County has an open communication with Virginia Department of Forestry (DOF), and tracks all timber harvests, however, enforcement of Seciton 10.101181.2.H of the Code of Virginia is DOF's authority, not the County's.
#6816	6.02 Steep Slope Areas
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:12/31/2021	Clarify minimum slope area in 5.03.02.C.2.a: if an area is greater than 5,000 sf but less than 15' wide, do the regulations apply? It is not clear in the text.
#6896	6.02 Steep Slope Areas
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/3/2022	Acknowledged. It seems like the sentence would be clarified by the word "either" or "both". We'll clarify intent and make the revision.
#6924	6.02 Steep Slope Areas
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	The correction to "or" meets the intent of staff direction from ZOAM-2014-0004 when the minimum sizes were last updated.
#11019	6.01 River and Stream Corridor Resources (RSCR)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"Table 5.03.01-1: DETERMINING THE WIDTH OF THE RSCR MANAGEMENT AREA 2022 Round 3 Input: Appreciate that Goose Creek is denoted as a Scenic River; however, please note that the North Fork of the Goose Creek is not so designated. The North Fork watershed constitutes approximately 65,000 acres in Loudoun County. It originates in the Blue Ridge Mountains and flows through regions of agricultural land as well as urban and suburban land, including the towns of Round Hill, Purcellville, and Hamilton, and the villages of Saint Louis, Philomont, and Bluemont. We would like to see the North Fork added to the table to be protected by the same standards as the Scenic Rivers, Potomac, and Bull Run."
#10353	6.01 River and Stream Corridor Resources (RSCR)

ID	Section
By: William Junda Tags: zoc bjunda@gordon.us.com Date:6/27/2022	The draft text proposes to codify the comprehensive plan goals for floodplain without any mechanism for modification or encroachments beyond a small list of allowances, or site-specific conditions such as: <ul style="list-style-type: none"> • The RSCR language applies evenly to minor and major floodplain. However, minor floodplain can be impacted/alterd for many reasons. Minor floodplain is NOT regulated by FEMA. • Minor floodplain can be piped. As written the draft ordinance would require RSCR buffers/avoidance from an existing piped conveyance. Under the current ordinance, staff has the ability to logically respond to these situations and not require RSCR avoidance for a piped/man-made channel under a parking lot. • As proposed, the buffer widths would exceed Fairfax's RPA methodology...without an avenue to request special consideration for impacts. Fairfax has a process to request work in the RPA for special circumstances.
#9741	6.01 River and Stream Corridor Resources (RSCR)
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/22/2022	Shouldn't the RSCR buffer requirements include different considerations when a RSCR and/or RSCR Buffer lies within a developed area and/or previously altered floodplain? Too often a RSCR/Buffer is getting applied to a piped outfall or where a floodplain gets mapped over an existing parking lot/development.
#9740	6.01 River and Stream Corridor Resources (RSCR)
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/22/2022	is the 100' minimum wide buffer appropriate? Minor floodplain can be channelized/piped and may have a width less than 100'. How does this section apply to altered floodplain conditions like this?
#7568	6.01 River and Stream Corridor Resources (RSCR)
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/21/2022	D. RSCR Management Area. Thank you Chris for your response to the question about increasing the buffer to 500ft for certain streams per the source water protection BMI. If that can be included with the rewrite, then please make those changes herein.
#7948	6.01 River and Stream Corridor Resources (RSCR)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/26/2022	We will take this into consideration when revising the text.
#7157	6.01 River and Stream Corridor Resources (RSCR)
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	5.03.01.B.2 The exemptions should not be residential only. The wording/punctuation is not clear if that is the case. In any event - business uses, civic uses, government uses, etc. should not be intentionally or inadvertently excluded.

ID	Section
#7366	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	This exemption is to specifically allow an exemption for 1 residential dwelling unit where the zoning district prescribes a residential dwelling unit limitation. If you wish to recommend that non residential uses be exempted, please recommend a limitation that you think is comparable to a single dwelling unit limitation and would be appropriate for the RSCR (FAR? lot coverage?)
#7156	6.01 River and Stream Corridor Resources (RSCR)
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	5.03.02.B.2.a The exemption should apply to nonresidential uses also. How is it not arbitrary to include one, not the other? Why 1993? Steep slopes that are now a part of RSCR creates a new restriction from before adoption because they are part of the newly created RSCR. This Exemption should be similar as far as effective date in 5.03.01.B.2
#7367	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Please see response to comment 7157
#7155	6.01 River and Stream Corridor Resources (RSCR)
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	5.03.01.D The graphic shown at the ZOC meeting is helpful but the concept of a mandated 100 or 300 foot wide corridor that can be centered anywhere seems odd. For the Ordinance or FSM to not be specific is tremendously lacking. A 300 foot corridor that may only warrant 200 feet in width due to landforms is completely arbitrary to decide how to place since there is no apparent need on the surface. I don't see how the ordinance can not address the lacking need or how to place if landforms are missing. Or how to modify since the landform does not exist. 100 or 300 foot dimensions in all cases is arbitrary.
#7368	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	the 100 and 300 foot buffers are directly prescribed by Chapter 3 of the 2019 General Plan. The 2019 GP also defines the resources and how the buffer is applied. Site specific determinations may be required, similar to other protected environmental features under the R93 ZO.
#7154	6.01 River and Stream Corridor Resources (RSCR)
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	5.03.01 Similar requirements in other jurisdictions are much more specific. Ordinances need to be clear. These requirements can be interpreted many ways. The addition of graphics will help, but the fact this reads more Comp Plan like needs work to make it an Ordinance.

ID	Section
#7369	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Acknowledged. Staff is willing to consider any specific recommendations for clarifying the RSCR regulations.
#7153	6.01 River and Stream Corridor Resources (RSCR)
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:1/12/2022	5.03.01 These kinds of requirements need opportunity to adapt to the specific landforms. These requirements come across hard to read, hard to implement and too rigid. Landforms vary. There should be more opportunities to modify and more clear exemptions.
#7370	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Staff is willing to consider specific recommendations for further clarifying the regulations or additional appropriate modifications within the prescribed RSCR policies of the 2019 GP.
#6849	6.01 River and Stream Corridor Resources (RSCR)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.03.01.B.2.b. EXISTING STRUCTURES can be "added to." Is there a limit on this? There is apparently a limit on rebuilding, but it is not apparent for adding to existing structures?
#6917	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/4/2022	There are no limits beyond the limits of the zoning districts and related development standards. If you would like a specific percentage limitation, please recommend a percentage.
#6944	6.01 River and Stream Corridor Resources (RSCR)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	I proposed a limit for discussion.
#7001	6.01 River and Stream Corridor Resources (RSCR)
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:1/5/2022	For the purpose of preserving property values and expectations of existing owners, I recommend not imposing limits on the size of new, rebuilt or existing structures. Language could require that construction stay out of the buffer areas as much as practicable. Of course, underlying existing setbacks would remain in force.

ID	Section
#7371	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	acknowledged. Exemption language has been revised to propose a limit.
#6983	6.01 River and Stream Corridor Resources (RSCR)
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:1/5/2022	Current ordinance offers the following: The above setbacks may be reduced as follows: (1) A reduction of 100 feet shall be allowed for the retention of an existing forested area or the creation of a forested area, as approved by the County Urban Forester as part of a management plan between the ultimate setback line and the channel scar line; or (2) A reduction of 100 feet shall be allowed for the use of and retention of stormwater management/BMP practices in accordance with the FSM at time of development within any developed area on the lot or site. This should be retained in some form or fashion.
#7372	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Staff will consider retaining this regulation if in accordance with the RSCR policies of the 2019 GP.
#6976	6.01 River and Stream Corridor Resources (RSCR)
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/5/2022	A. Landscape Plans This section should not only prohibit the use of invasive non-native plants of all kinds, but should also specify the requirement to remove invasive non-natives in tree save and natural areas.
#7373	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/18/2022	Please provide the section reference for this comment - we are having a hard time identifying the corresponding regulation/language.
#6910	6.01 River and Stream Corridor Resources (RSCR)
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	D. RSCR Management Area. Is there any possibility that the outcome of the Stream Buffer/Source Water Protection BMI could be included in this ZOR update?
#6919	6.01 River and Stream Corridor Resources (RSCR)

ID	Section
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/4/2022	If this is referring to exploring a 500 foot buffer for specific rivers and streams, we can consider this as part of the rewrite.
#6908	6.01 River and Stream Corridor Resources (RSCR)
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	2. Exemptions. a. Existing Lots of Record. Has a typo ("as of as of"). Does the reference to "attendant unpaved or permeable surface driveway, unpaved or permeable surface parking area..." mean that these are required to be unpaved? Not clear.
#6914	6.01 River and Stream Corridor Resources (RSCR)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Corrected. Thank you.
#6907	6.01 River and Stream Corridor Resources (RSCR)
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:1/4/2022	One important purpose is missing, plus some specifics that could be incorporated into the new list: At the end of the Purpose statement, add: ..."to regulate construction of buildings, structures, parking, and other impervious surfaces adjacent to all waterways greater than 100 acres to": This list of goals is good, but it's much less specific than some of the existing language to clarify the "how" the ordinance accomplishes the purpose: i.e.provide setback major and minor fp, how it increases groundwater recharge, promote stream health through vegetated riparian buffers and riparian tree canopy cover, and also to maintain scenic beauty and implement the Comp Plan. What is the reasoning on this?
#6920	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:1/4/2022	One of the modernization approaches we are taking with the new zoning ordinance is to limit the purpose statements to policy goals and enabling references. We can include more specific goal language in the purpose statement, but something as specific as a reference to the setbacks would be a regulation and is included below the purpose statement.
#6850	6.01 River and Stream Corridor Resources (RSCR)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	5.03.01.E.4. MODIFICATION OF REQUIRED BUFFER. Uses a, b, and c: are these uses, such as parking, limited?
#6915	6.01 River and Stream Corridor Resources (RSCR)

ID	Section
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/4/2022	The parking here refers to parking associated with a use specified as permitted within the RSCR. Parking is a requirement, so if there is interest in limiting the parking requirement within the RSCR for a RSCR permitted use, please provide that input.
#7376	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/18/2022	a and c are requirements for the use, and b must meet the definition for an accessory use/structure (customarily incidental and subordinate to the permitted principal use). However, we would like to further consider whether specific limitations on parking and accessory structures for RSCR permitted uses are necessary/to what extent. Any specific recommendations are welcome.
#6848	6.01 River and Stream Corridor Resources (RSCR)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.03.01. RIPARIAN BUFFER PLANTINGS. Is there a place within the RSCR section where the County could initiate the needed studies to revisit the FEMA ruling on riparian buffer plantings?
#7949	6.01 River and Stream Corridor Resources (RSCR)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/26/2022	FEMA's direction applies to the Floodplain Overlay District (FOD), the RSCR is not part of FEMA's authority.
#6841	6.01 River and Stream Corridor Resources (RSCR)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	<p>"In regards to codifying the recommendations of the LPAT Framework Plan, what is PRCS's stance? Does PRCS believe ""they will take care of it"" and therefore does not require reference in the Zoning Ordinance? If that is the case, how will the environmental protections put forth in the LPAT Framework Plan actually be incorporated? Is PRCS staff able to request provisions in the new Zoning Ordinance? If not, it would be helpful for PRCS to achieve what they want to achieve in regards to the LPAT Plan if there is language in the Zoning Ordinance to codify. Being part of the Zoning Ordinance would help ensure that environmental protections are included as part of implementation, and would provide accountability for the public and PRCS, and it seems like the RSCR section would be an appropriate place. It would also ensure that employees, current and future, would have to follow the standards, which is important during the long-term LPAT project that may last longer than the current employees.</p> <p>In general, how will the County ensure that LPAT Framework Plan design elements, (which are good), will not be cast aside if they are not incorporated into the Zoning Ordinance?"</p>
#6921	6.01 River and Stream Corridor Resources (RSCR)

ID	Section
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/4/2022	The LPAT will be subject to the entirety of the new zoning ordinance, including, but not limited to the environmental and resource provisions of the MDOD, LOD, FOD, RSCR, and/or Steep Slopes
#7375	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/18/2022	The LPAT includes a range of implementation policies, including land leases and public land ownership, and recommends trail systems without identifying a defined, final network of trailheads and infrastructure. As such, the LPAT is a policy document and cannot in its entirety be codified into the zoning ordinance. The new ZO can and should be aligned with LPAT policies, so if there are specific ZO regulations that are related to LPAT implementation (open space, RSCR, uses, parking, etc) we are happy to consider any specific recommendations for better LPAT policy alignment. The LPAT as a whole was reviewed by the ZOR team and DPZ prior to final adoption by the BOS.
#6814	6.01 River and Stream Corridor Resources (RSCR)
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date: 12/31/2021	5.03.01.B.2.b There seems to be a contradiction here, in that first it says an existing building can be added onto, and then it says if destroyed by fire, etc. it can be rebuilt to only the original size. If you could have made it bigger before it was destroyed, why should the rebuilt structure be then limited?
#6923	6.01 River and Stream Corridor Resources (RSCR)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/4/2022	Additional language added for the purposes of discussion. Subject to CAO review.
#7374	6.01 River and Stream Corridor Resources (RSCR)
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 1/18/2022	We would consider the rebuilt structure to be eligible for the allowable expansion. The expansion language is just supposed to function as a hard limit to expansion of the use. We'll try to work on this exemption language to see if it can be rewritten to be clearer.
#6847	Chapter 6: Natural and Environmental Resources (NER)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.03. CIRCULAR REFERENCES BETWEEN ZOR AND FSM. The Zoning Ordinance needs to be updated to initiate an update of the FSM. Otherwise circular logic of the ZO pointing to the FSM before the FSM standards have been updated to reflect the new ZO is circular and non-effective.) When will this review be done for ZOR/FSM updates?
#6904	Chapter 6: Natural and Environmental Resources (NER)

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/4/2022	An amendment to the FSM is anticipated as part of the process, however, at this pre-referral stage, it is premature for the FSM-PRC to begin drafting changes that could change.
#6999	Chapter 6: Natural and Environmental Resources (NER)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/5/2022	Clarity provided during the ZOC 5JAN22 meeting, the comment is more seeking when the amendments to the FSM would be initiated, during the PC in parallel to the ZOR review?
#6846	Chapter 6: Natural and Environmental Resources (NER)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	<p>"5.03.02 STEEP SLOPES. APPLICABILITY & EXEMPTIONS. B.2.a states, "Single Family Dwelling on Existing Legal Lot. Construction of a single residential use on a legal lot existing as of June 16, 1993, is exempt from the requirements of Section 5.03.02.D. Such exemption does not apply to nonresidential uses. Development on such lot is subject to all applicable standards provided in Section 5.03.04." The only thing that has changed from current zoning is the date, which still indicates that the steep slopes protection is ruled null and void if the lot existed 30 years ago. The primary issue is that many of the "lots of concern" are the old wood lots on the Short Hill, Blue Ridge, and Catoctin Ridges, which are the areas that tend to have the most steep slopes. If the new Zoning Ordinance does not protecting those slopes -- probably our most sensitive and most important to protect -- what are we protecting? The logic is similar to the prime ag soils question -- "protecting" the asset as long as the residential development potential is still allowed to supersede any agricultural or environmental concern."</p>
#6905	Chapter 6: Natural and Environmental Resources (NER)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/4/2022	That is a good point, especially as we see less available, or more easily developable lots. It is important to note that the exemption is only for 5.03.02.D - which prohibits land disturbance except for a limited amount of uses. These lots are still subject to the standards that are now in 5.03.03. Regardless, removing this exemption has been considered, in the past, a "taking" and therefore avoided. Additionally, the Board has clarified their direction with the ZOR to not change the density in western Loudoun. We will further discuss internally.
#6997	Chapter 6: Natural and Environmental Resources (NER)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/5/2022	Additional clarity provided during the ZOC 5JAN22 meeting concerning the assessed value of many of these lots as "developable" sets the stage for them to be considered for development as the number of available parcels becomes more scarce. This fact is recognized by staff and will be further considered while revising the text.
#8191	Chapter 6: Natural and Environmental Resources (NER)

ID	Section
By: Jason Hobbie Tags: staff jason.hobbie@loudoun.gov Date:2/7/2022	The biggest issue is not steep slopes, it is getting access to these lots that meets ZO access requirements.
#6845	Chapter 6: Natural and Environmental Resources (NER)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	<p>"5.03.02 STEEP SLOPES. APPLICABILITY & EXEMPTIONS. CLOSING B&D LOOPHOLES. Staff (including the ZOR Project Manager) are directly aware of instances where land is being cleared on Steep Slopes under the guise of a non-existing (or expired) ""Forestry Management Plan,"" after the County was made aware of the lack of VDOT entrance permits, with no applied for or approved grading permits or review for erosion, and attempts to use a third party ""soils report"" to obtain a farm management plan on property in conservation easement -- all with the directly knowledge of the ultimate development plans based on boundary line adjustment submission and county approval.</p> <p>Due to the KNOWN lack of communication and enforcement issues related to grading/clear cutting, and ignoring permits, how will these loopholes be closed with the new zoning ordinance for steep slope areas?"</p>
#6906	Chapter 6: Natural and Environmental Resources (NER)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Indeed, staff are aware and have experienced "loopholes" and challenges with enforcement. Staff is working with the CAO to develop strategies, and the existing steep slopes exemptions represents the most contemporary starting point, with revisions adopted 12/2/2015 in effort to align with state code but address challenges realized in the 2000's.
#6998	Chapter 6: Natural and Environmental Resources (NER)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/5/2022	Further clarity at the ZOC 5JAN22 meeting indicated concerns, not with enforcement, but with communication and process/procedures. The Procedures section is still being drafted, however, staff continually attempt to improve internal procedures to align with the intent of the Ordinance.
#6843	Chapter 6: Natural and Environmental Resources (NER)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	<p>"5.03. PROHIBITION OF CLEAR CUTTING. Is there a place where clear cutting of lots is prohibited in advance of building lots or future uses (e.g., solar commercial) later? While there may be restrictions in the state codes on how this is handled, at the least there could be a grace period to disincentivize people to clear lots in anticipation of selling them to a developer to be built upon without as many restrictions due to the lack of a tree canopy."</p>
#6909	Chapter 6: Natural and Environmental Resources (NER)

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/4/2022	Staff needs more clarification. Clear cutting, i.e. land disturbing activity, for any non-exempt use is not permitted within RSCR or Steep Slopes without complying with these standards. Unpermitted activity transfers with the property, and remains unpermitted regardless of ownership.
#6842	Chapter 6: Natural and Environmental Resources (NER)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	5.03. 2019 COMP PLAN SUSTAINABILITY POLICIES. How will new Zoning Ordinances to reflect the new Sustainability Policies in the new Comprehensive Plan be handled?
#6911	Chapter 6: Natural and Environmental Resources (NER)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/4/2022	The RSCR and Steep Slopes standards serve to continue to and increase the current protections of the natural and environmental resources that this section sets out to protect. Aspects of the Clean Water Initiative, the Environmental Policy and Stormwater Management Program are implemented in these sections. Bringing our attention to specific additions or opportunities are appreciated, and will be considered, by staff.
#6840	Chapter 6: Natural and Environmental Resources (NER)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 1/3/2022	"2019 COMP PLAN COMPLIANCE CHECKLIST. Although the Staff summary memo is very useful, distribution of only ""a clean version of draft text"" (p. 2 of memo) makes it difficult to determine to what extent this draft implements the 20+ environmental actions called for in the Comprehensive Plan. Rather than ""tracked changes"" that Staff feels is ""impracticable,""(p.2) could a reverse check list be provided that lists the 2019 Comp Plan Policy/Action (bullet or column format) with the reference to where it is implemented in the Draft text by Section reference? Without this general means to review the draft text, if it is difficult for ZOC members and associates to evaluate how each Policy/Action has been achieved then it may result in exponential volume of questions from the general public when the draft is released for 90-day review in April 2022. Does such a 2019 Comp Plan ""checklist view"" already exist for ANY/ALL sections? If not, can it be prepared before ZOC Subcommittee review in March/April?"
#6912	Chapter 6: Natural and Environmental Resources (NER)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 1/4/2022	Thank you for this idea, this seems to be a valuable tool for both staff and external reviews. Staff will discuss how to best approach such a tool.
#6838	Chapter 6: Natural and Environmental Resources (NER)

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:1/3/2022	"LIMITED EnCodePlus DISPLAY FOR ZOC MEMBERS. At a previous meeting I requested a full Table of Contents of all sections for the new Zoning Ordinance with section numbers referenced. This was displayed on enCodePlus at the next meeting. However, now that ZOC has limited view after the Planning Commission has started ZOR work, there is no way to cross-check / confirm / review the links referenced in the draft text under review. Either provide a pdf full table of contents or allow the table of contents on enCodePlus to REMAIN VISIBLE to ALL users."
#6913	Chapter 6: Natural and Environmental Resources (NER)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:1/4/2022	Staff have created a pdf that is under review prior to distribution.
#9993	5.08 Historic Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/17/2022	I note that in 4.08 the fly out that associates with the term 'alteration' refers to 'floodplain' alteration...obviously not all alterations are the same.
#8521	5.08 Historic Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:2/14/2022	From LHVA: "4.07.D.3.a. HISTORIC OVERLAY DISTRICT. Throughout Historic District is changed to HOD, except in at least one case and maybe more (4.07 D.3.a.), there is a mention of "Historic District Guidelines for said HOD." Throughout the materials there is no mention of any zoning sections other than this in which rules for developing the Historic District guidelines for the individual overlay districts are discussed. Where is that? Is it the same place the Historic District Review Committee's procedures are discussed beyond that is in Section 4? Should this be cross-referenced in some way? "
#8595	5.08 Historic Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022	See Section B.2. under Applicability.
#8520	5.08 Historic Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:2/14/2022	"4.07.D.1.b.1.a HISTORIC OVERLAY DISTRICT. CAPP. EXEMPTION. Exception. This added regulation to HOD provides the CLOSEST AND BEST definition of ""FARM"" yet produced during the Zoning Ordinance Rewrite. b. Exception. A farm building or structure does not require HDRC approval of a CAPP , unless otherwise so required by the Zoning Administrator or the Zoning Administrator's designee, if the work to be completed meets the following criteria:

ID	Section
	<p>1. The work to be completed is to a bona fide farm building or structure; and a. For the purposes of Section 4.07.C, a “bona fide farm building or structure” is a building or structure primarily used for agricultural, horticultural, or animal husbandry purposes as defined in this Zoning Ordinance, and located on a parcel that is subject to a farm plan approved by the Loudoun County Soil and Water Conservation District, or classified by the Office of the County Assessor under the land use tax assessment program as Agriculture. QUESTION: What is the status of the definition of “farm?” For consistency, can/will it contain the SAME terms and conditions as HOD requiring “use of land for agricultural, horticultural, or animal husbandry purposes as defined in this Zoning Ordinance, and located on a parcel that is subject to a farm plan approved by the Loudoun County Soil and Water Conservation District, or classified by the Office of the County Assessor under the land use tax assessment program as Agriculture.”</p>
#8596	5.08 Historic Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022	Will bring suggestion to the team.
#8519	5.08 Historic Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:2/14/2022	4.07. HISTORIC OVERLAY DISTRICT. Relocation of several sections previously part of the Historic Overlay District text to Chapter 7 - Procedures confirms the important of review all the changes made to Chapter 7 for impacts to previous chapters.
#8597	5.08 Historic Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/16/2022	acknowledged.
#8518	5.08 Historic Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:2/14/2022	C.10. Delete second "replacement" at end of the sentence.
#8517	5.08 Historic Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:2/14/2022	C.8. Delete the second "installation" at the end of the sentence.

ID	Section
#13529	5.07 Village Conservation Overlay District
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	B. Within district boundaries, include traffic calming measures and reduced speed limits in VCOD standards.
#14458	5.07 Village Conservation Overlay District
By: Judi Birkitt Tags: staff judi.birkitt@loudoun.gov Date:8/14/2022	This is helpful for consideration when the county completes village area plans.
#13528	5.07 Village Conservation Overlay District
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	D. VCOD Development Standards: Add more residential and commercial standards to avoid altering the character/look of the community at-large.
#13527	5.07 Village Conservation Overlay District
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	4.07 B & C. Add VCOD to other Rural Historic Villages that qualify, i.e. Unison, Howardsville, Willisville, Morrisonville.
#10980	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	No mention in new Chapter 4.07 of how other villages might seek VCOD overlay if they want to.
#10979	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	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?
#10978	5.07 Village Conservation Overlay District

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	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?
#10977	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	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?
#10976	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	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
#10975	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"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):"
#10974	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"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?"
#5728	5.07 Village Conservation Overlay District

ID	Section
By: Maura Walsh-Copeland Tags: zoc 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	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: 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.
#6068	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	LVHA question: How do Road Corridor Setbacks provide a buffer area around an historic village?
#8835	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Road corridor setbacks apply to land outside the VCOD, but not in the VCOD. Therefore, there will be visual separation at the edge of the village where the setback decreases. At this time, requiring a buffer around the edge of a village is not practical since the VCOD, the 2019 GP RHV designations, and village zoning districts, are not coincident. Upon adoption of small area plans for the villages, staff will consider the feasibility of requiring a buffer around villages.
#5731	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: 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.
#6067	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc	LHVA: There is no mention of dealing with oversize buildings (eg: firehouses/schools) unless heights and new setbacks apply to them. Do they?

ID	Section
Maura@Walsh-CopelandConsulting.com Date:11/14/2021	
#8836	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	The VCOD regulations apply to any new structures in the overlay; there are no exceptions.
#5726	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/1/2021	4.06 VCOD. OVERALL. If more than one overlay covers a property, which language prevails?
#5831	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: 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.
#6066	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	To address Kate's "needs follow up" note: LVHA: Often the stronger/more restrictive language prevails eg: if easement allows 1 house per acre but zoning allows 3, easement language prevails.
#8837	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Each overlay would apply. If there are conflicting regulations, typically, the more strict would apply.
#5727	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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? "

ID	Section
#5830	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/3/2021	Noted. Staff will take potential reduction in density, enforcement, and evaluation questions under consideration.
#6065	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	LVHA and supporters are very concerned about current density in villages especially the fairly new density added to RC. Density is determined by underlying zoning which we know some are reluctant to change. Village representatives and supporters hope there will be a hard look at densities in the historic villages during the SMALL AREA PLANNING process. This is the single biggest threat to Loudoun’s historic villages. When RC zoning had residential density added to it a few years ago (in response to potential excessive density in Ashburn Historic village), many Village representatives pointed out the unintended consequences of the approach approved (4 units/ acre plus a minimum lot size). Village reps were told at that time that the BOS understood, and that it could/would be fixed when rewriting the zoning. With the delay of the Small Area Plans, that means when zoning (ZOR) is approved the issue will still remain for, what, several more years? Current RC density could also stand in the way of adaptive reuse because of the minimum lot size. [E.g.: Waterford PO has apartment above it on a very small lot. Would not be allowed by current RC zoning. Philomont Store has apartments above it.] Multi use is common for historic properties. It’s hard to maintain historic precedent for development when the density allows more development than precedent would allow, e.g. St Louis. The minimum lot size could be just as damaging as the 4 units/acre. Each historic village needs a unique density depending on the traditional layout of that historic village. Sooner rather than years later.
#8838	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	By requiring the use of existing lots and buildings to determine size, the historic development pattern will be reflected in the new development pattern. While this would not directly regulate density, it will result in building size, scale, mass, streetscape of the existing village being closely replicated in new development. County staff reviews applications and plans for subdivisions, site plans, and permits for individual buildings in the VCOD and will apply these regulations.
#5732	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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?
#5826	5.07 Village Conservation Overlay District

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/3/2021	Noted. Staff will take under consideration.
#6064	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	LHVA: Most historic villages do not have garages at all. Some have detached ones or use barns that have been repurposed. But they certainly would not be attached. Requiring that they be recessed and for 2 vehicles max would retain feel of historic setting.
#5733	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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?
#5825	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/3/2021	Noted. Staff will take under consideration.
#6063	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	LHVA: Cul de Sacs would not be appropriate in an historic village. Dead end would work but not a circular pattern with development around it.
#8839	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	All roads in the RPA must be public streets. VDOT requires culs-de-sac at stubbed streets (for future connection) or dead end streets. The County cannot preclude culs-de-sac from roads to be accepted by VDOT. Also, any dead end configuration will have to accommodate the turn around of emergency vehicles. Staff has included a requirement to create a connection (or 2 ways out) for new roads when possible so that a cul-de-sac would not be necessary.
#8840	5.07 Village Conservation Overlay District

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	No, it does not prevent subdivision. But, it requires the subdivision to follow the street and building pattern of the existing village. 10 b 2 means that if a block has an alley, then the block can be 2 times the length of the max block length. See response below re: cul-de-sacs.
#5734	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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."
#5822	5.07 Village Conservation Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/3/2021	Noted. Staff will take under consideration.
#6062	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	LHVA: Each historic village unique. Some have sidewalks (or remnants) and some have never had them. REQUIRING them in these instances could change character of that village completely. (No idea where that requirement came from!) This needs to be part of Small Area Plan (SAP). Until then, please follow existing pattern in a village.
#8841	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Amendment to sidewalk regulations will be addressed after adoption of small area plans and based on the analysis of each village.
#6061	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	"4.06 Village Conservation Overlay District – VCOD. In terms of consistency, are other sections of the Zoning Ordinance complementary to ""Maintain areas of open space and natural areas on the perimeter of the villages to retain a hard edge and visual separation of the Rural Historic Villages from the surrounding agricultural landscape;""? How is the LPAT plan going to be incorporated into VCOD to be compatible and complementary?"
#8842	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	At this time, requiring a buffer around the edge of a village is not practical since the VCOD, the 2019 GP RHV designations, and village zoning districts, are not coincident. Upon adoption of small area plans for the villages, staff will consider the feasibility and applicability of requiring a buffer around villages.

ID	Section
#5971	5.07 Village Conservation Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/11/2021	I second Maura's remarks especially with respect to context. Regulations should not interfere with the context we are claiming to protect. One solution for example is to allow administrative waivers of yards when it is demonstrated that a project is not reducing yard beyond what exists generally within the district. This is regularly done by the HDRC.
#8843	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	The VCOD also does this by allowing yards or other standards to be within a certain percentage of the average of neighboring properties.
#5735	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/1/2021	4.06.D.12. VCOD. STREET TREES. Support language 100%. Thank you.
#5729	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: 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.
#5725	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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	5.07 Village Conservation Overlay District

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 11/3/2021	To be addressed with STRR ZOAM. Staff notified STRR ZOAM project manager of comment.
#5724	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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	5.07 Village Conservation Overlay District
By: Ryan Reed Tags: 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	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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	5.07 Village Conservation Overlay District
By: Kate McConnell Tags: 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	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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	5.07 Village Conservation Overlay District

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 11/3/2021	Noted. Thank you for review of this section.
#5721	5.07 Village Conservation Overlay District
By: Maura Walsh-Copeland Tags: zoc 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	5.07 Village Conservation Overlay District
By: Ryan Reed Tags: 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.
#3956	5.06 Quarry Notification Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 9/12/2021	4.05 QUARRY NOTIFICATION OVERLAY DISTRICT. The concept and requirements for "Full Disclosure Statement," for QNOD are similar in concept as requested for the Use of "Stockpiling." Can the same or similar notice to neighboring land uses and owners within 3,000 feet of a Stockpiling application be development and included in ZOR?
#4182	5.06 Quarry Notification Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date: 9/14/2021	We can look into whether or not a disclosure statement requirement can be required for stockpiling.
#4047	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 9/13/2021	"4.04. LIMESTONE OVERLAY DISTRICT. Loudoun's land-use ordinance—especially in the sensitive limestone underlay areas should provide prudent land use policies which provide for the safety and quality of life for the citizens—those who reside here, and those who will be coming—now and into the future. Can a County "business model" structured to increase the tax base be of value if the County ends up with a disaster that makes a train wreck of the budget?"
#4086	5.05 Limestone Overlay District

ID	Section
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	acknowledged. Please advise if there are any suggested changes to the LOD purpose statement based on this comment.
#4583	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:10/4/2021	As indicated in MDOD, the link provides a list of proposed uses that should NOT be permitted in Villages, including those in/near LOD https://loudouncoalition.org/wp-content/uploads/2021/10/ZOR-Proposed-MDOD-Village-USE-EXCLUSIONS-10-6-21.pdf LCPCC member organizations available for questions or review upon request.
#4760	5.05 Limestone Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:10/5/2021	Staff will review the suggested list of uses for their conformance with the 2019 General Plan.
#4405	5.05 Limestone Overlay District
By: John Merrithew Tags: zoc Date:9/30/2021	Do the water management plan and the nutrient management plan have established requirements or standards that meet the County's LOD objectives? On its face just requiring these studies without requiring a minimum nutrient or water quality standard seems to make it difficult for staff to measure acceptability.
#4765	5.05 Limestone Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	A Nutrient Management Plan approved by the LCSWCA is governed by 4VAC50-85-140 - Required nutrient management plan procedures. Water Management Plan is undefined in the County's FSM and at the state level, it addresses groundwater withdrawal, which for the purposes of irrigation is prohibited in the LOD. Staff will continue to research for appropriate terminology to achieve the purpose, such as Environmental Site Design and LID / BMP considerations that exist within the FSM.
#4064	5.05 Limestone Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.04.F.5.b Communal Water Supply Systems Based on this requirement, it would seem that these are more protective of groundwater for larger subdivisions that are not on central systems. Is that correct and if so, what about subdivisions of a similar size and/or larger in other parts of the RPA?
#4076	5.05 Limestone Overlay District

ID	Section
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	we can explore options to apply a communal water supply requirement at an earlier threshold for subdivisions
#4063	5.05 Limestone Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.04.E.5 Prohibition of Specific Pollution Sources. I agree with Maura. Also, I thought that all changes to the existing text were highlighted in the material we received, but this was not. Are there other changes that were not highlighted in the redline/track changes version?
#4078	5.05 Limestone Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	Although we have retained most of the regulations of the the LOD and MDOD, language and formatting of these sections have been substantially revised to the extent that a track changes showing all revisions was incomprehensible. Specific tracked changes shown in the distributed PDFs indicate tentative changes to text.
#4085	5.05 Limestone Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	Please see comment response #4084 to Maura
#4046	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	"4.04. LIMESTONE OVERLAY DISTRICT. It is difficult to regulate land use on areas with foundation stability problems, aquifer contamination potential, or actual damage to ground water resources. We should now know enough to know what we don't know. We should now know enough to know that engineering strategies for remediation have significant potential for failure and/or may not be cost effective. Remediation may negate or avoid initial failure, but a fix on the fix approach can prove to be both an environmental and economic failure. How can/will the ordinance deal with potential problems and solutions, including costs, in this rewrite? Specifically, the ordinance should be clear as to who picks up the pieces when remediation is required? In anticipation of these liabilities, who pays for delineating a sinkhole fed groundwater system? Who pays for drilling, geophysical profiling, pump tests, dye tests? Do you proceed knowing that the unknowable—that with a wetter climate, new instabilities, new sink holes, and new flow paths may occur? Can you anticipate where they will be?"
#4216	5.05 Limestone Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov	we are open to suggestions.

ID	Section
Date:9/15/2021	
#4032	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.04.H LIMESTONE OVERLAY DISTRICT H.2. Administrative Applications. Beyond only applications submitted to B&D and/or Zoning for permits, how can it be expanded to include coordination, copy and/or approval of applications to the Health Dept or ODW to close the loopholes being abused due to lack of communication between department?
#4088	5.05 Limestone Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	This specific reference to the Department of Building & Development is made to recognize that nearly all land disturbance and land development applications in the County are managed by B&D. Uncodified Acts, Chapter 521 (SB1221) may allow the LC Department of Health to work more closely with other departments and improve communication.
#4031	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	"4.04.G LIMESTONE OVERLAY DISTRICT. G. Mitigation Measures for the LOD. In addition to those measures listed, the following should also be included as recommended by LOD experts: -- The intent is to characterize a flood plain as a dynamic system with parameters that can change. Due to changing weather patterns with resulting changes in runoff parameters and due to increasing coverage/density of impermeable paving within the Limestone Overlay District. -- After an initial study to review the footprint of flood plains, ephemeral stream courses, and sinkhole appearances in the Limestone Overlay District, review periodically, every two years or less, and after an exceptionally large flood event. -- Amend the Limestone Overlay District map to identify systematic increase in rainfall/runoff and its effect on stream course and sinkhole development-- Prioritize County staff to become informed and make initial recommendations based on antecedent measurable events to set the stage for future adjustments."
#4221	5.05 Limestone Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/15/2021	Staff will take these suggestions under consideration.
#4030	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.04.G LIMESTONE OVERLAY DISTRICTS G. Mitigation Measures for LOD. This may be a semantic issue for what is allowed, but why aren't all of these mitigation measures standard for all development applications in the LOD?

ID	Section
#4089	5.05 Limestone Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	we can consider revising 4.0.4.G from "land disturbing activities" to "Covered Activities", so that all covered activities (applications, land disturbances, uses, land development) trigger the mitigation measures requirements.
#4029	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.04.G LIMESTONE OVERLAY DISTRICT. G.2.a. Ineligibility for Density Increases. SO -- if an applicant "may not" be eligible for density increases otherwise permitted under the clustering provisions," for LOD, why can't (or won't) the same requirement apply for other overlay districts (specifically, FOD and MDOD)?
#4090	5.05 Limestone Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	We can certainly consider/explore adding the ineligibility for density increases to the other Overlay Districts. Further, we can consider adding more of these mitigation measures to the MDOD (the FOD uses separate federal mitigation easures under the Code of Federal Regulations that are determined by FEMA and Virginia DCR)
#4028	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.04.F LIMESTONE OVERLAY DISTRICTS F. Development Standards for the LOD. In addition to inclusion of vernal pools as a sensitive environmental feature, why aren't the evaluation of obligate vernal pool species considered during the development process? Amphibians and other vernal pools species are some of the most sensitive wildlife species and need special considerations to adequately protect.
#4218	5.05 Limestone Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/15/2021	Staff can take this under consideration. The County coordinates sensitive species occurrences with DCR - Division of Natural Heritage in the land development application process. Staff does not believe this concern should be unique to the LOD, as the potential for rare, threatened or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations occur throughout the County.
#4027	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	"4.04.E LIMESTONE OVERLAY DISTRICTS. E.5. Why (in the world) were the following Pollution Sources REMOVED from the list prohibited within the LOD? c. Automobile service stations; d. Gas pumps accessory to convenience food store; e. Motor vehicle service and repair; Automotive Use Category uses identified in Section 3.02; eg. Landfills and waste sites. Waste-related Use Category uses identified in Section 3"

ID	Section
#4084	5.05 Limestone Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	This new list takes the R93 uses and revises the language for consistency with the new uses from Chapter 3. The R93 ZO specific uses "Automobile service stations", "Motor Vehicle service and repair" "Landfills and waste sites" are now covered under the "Automotive Use Category uses identified in Section 3.02" and "Waste-related Use Category uses identified in Section 3.02". By referencing the use categories in new Chapter 3 rather than individual uses, the list is now expanded to all uses falling under the automotive and waste use categories. In response to this comment, we have added "Convenience store (with gasoline sales) to cover the R93 reference to "Gas pumps accessory to convenience food store. Please advise if there are any other missed uses based on a new categorization under new Chapter 3.
#4026	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.04.D LIMESTONE OVERLAY DISTRICTS D.1 Identification of Karst/Sensitive Environmental Features and Required Setbacks. Why aren't vernal pools included (as they may not necessarily occur where there are sinkholes or other geophysical features)?
#4217	5.05 Limestone Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/15/2021	As stated, a vernal pool is not a feature unique to karst areas, however, when found in karst areas, they are closed depressions, i.e. sinkholes. When conditions are right (evapotranspiration, water table, saturation of subsurface voids), some sinkholes within the LOD act as vernal pools or estevelles.
#4025	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.04.D LIMESTONE OVERLAY DISTRICTS. D.1. Geophysical Study. To ensure the same issues as now evident in Lucketts be not permitted, will the requirement for geophysical study "for all land development applications and land disturbing activities" also be EXTENDED to any applications for wells or septic?
#4219	5.05 Limestone Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/15/2021	A geophysical study is currently required for all land disturbing activities, inclusive of wells and septic.
#4024	5.05 Limestone Overlay District
By: Maura Walsh-Copeland Tags: zoc	"4.04 LIMESTONE OVERLAY DISTRICTS. C.3.d. and C.f.4. Exemptions. The coordination between applications for Zoning, B&D and Health Dept./ODW MUST be addressed in ZOR to close known loopholes.

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:9/13/2021</p>	<p>F.2 Site grading permit requirements and F.5 reference to Wells regulations have been proven insufficient to avoid abuse and conscious loophole bypass between Zoning, B&D and Health Dept. How will new ZO address the egregious bypass of zoning requirements for well construction in the LOD? How can/will a zoning permit be REQUIRED for review and/or approval before well approval in LOD? "</p>
#4178	5.05 Limestone Overlay District
<p>By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021</p>	<p>Covered Activities has been revised to explicitly include "the location, sourcing, and construction of water supply systems under Chapter 1040 of the LCCO"</p>
#4220	5.05 Limestone Overlay District
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/15/2021</p>	<p>Furthermore, the "loophole" is that the Health Department has been an extension of the state and subject to the state's application procedures and timelines. Uncodified Acts, Chapter 521 (SB1221) may allow for better coordination between departments.</p>
#4023	5.05 Limestone Overlay District
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021</p>	<p>4.04.C.2 LIMESTONE OVERLAY DISTRICTS. C.2. If this list is to be considered comprehensive for Administrative Applications, AND ensure loopholes are closed (see next post), then shouldn't applications for Wells be added?</p>
#4180	5.05 Limestone Overlay District
<p>By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021</p>	<p>Covered Activities has been revised to explicitly include "the location, sourcing, and construction of water supply systems under Chapter 1040 of the LCCO"</p>
#4022	5.05 Limestone Overlay District
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021</p>	<p>"4.04 LIMESTONE OVERLAY DISTRICT. C. Applicability. Why was the second sentence* deleted, when a similar sentence was left for the FOD 4.02.E (and MDOD 4.03.D.1)?* The LOD is established as an overlay district, meaning that this district is overlaid upon other districts and the land so encumbered may be used in a manner permitted in the underlying district only if and to the extent that such use is also permitted in the overlay district."</p>
#4093	5.05 Limestone Overlay District
<p>By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021</p>	<p>an overall definition will be added, or the explanation of an overlay district will be added at the beginning of Chapter 4. Clarification that the permitted and special exception uses of the underlying zoning district are otherwise permitted in the LOD can be added to the LOD similar to the MDOD.</p>

ID	Section
#3938	5.05 Limestone Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/9/2021	Clarify what is intended by 'Rock Outcrop (for any well)'. It seems to indicate that one cannot drill a well within 10' of a rock outcrop. Is that it? Needs rewording.
#4095	5.05 Limestone Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	Acknowledged and revised to clarify "for drilling any well". We are open to any other suggestions to making the requirement clearer that a well specifically must be 10 feet from a Rock Outcrop (which is a Karst feature).
#4011	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.03.D MDOD Uses and Activities. Even with the reference to the "Covered Activities" definition, and "2. Permitted Uses" the regulations are insufficient for the protection of MDOD. LCPCC member organizations are preparing a clear list of Uses that should NOT be permitted for MDOD, Villages and Clusters. HOW can/will Staff incorporate review, consideration and implementation of separate use lists AS DISCUSSED during the Use Table Matrix and Use-Specific Standards ZOC discussions?
#4248	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Staff will consider all feedback and suggestions, including permitted uses in the MDOD.
#4582	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:10/4/2021	A list of proposed uses that should NOT be permitted in MDOD and Villages can be found here: https://loudouncoalition.org/wp-content/uploads/2021/10/ZOR-Proposed-MDOD-Village-USE-EXCLUSIONS-10-6-21.pdf LCPCC member organizations available for questions or review upon request.
#4762	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:10/5/2021	Staff will review the suggested use list for conformance with the 2019 General Plan
#4021	5.04 Mountainside Overlay District

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.03.H MDOD H. Supplemental Application Materials 1.a.7. Shouldn't forest cover also include requirement for contiguous canopy coverage and wildlife habitat with neighboring lots per the Comp Plan?
#4103	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	The current list is for submission materials for applications, rather than performance standards. The list requires all forest cover to be shown on the application, which would include contiguous canopy/forest covered areas. In order to include a submission requirement to show wildlife habitats, we would need additional feedback detailing a preferred clear definition for wildlife habitat that includes parameters for what qualifies as a wildlife habitat (otherwise, all undeveloped areas of the MDOD could be considered habitat for wildlife), and how these habitats would be identified and tracked in a manner a manner that is feasible for the property owner.
#4579	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:10/4/2021	Per your request for additional feedback: "Response #4103 by Christopher Blough, 9.14.21. ""The current list is for submission materials for applications, rather than performance standards. The list requires all forest cover to be shown on the application, which would include contiguous canopy/forest covered areas. In order to include a submission requirement to show wildlife habitats, we would need additional feedback detailing a preferred clear definition for wildlife habitat that includes parameters for what qualifies as a wildlife habitat (otherwise, all undeveloped areas of the MDOD could be considered habitat for wildlife), and how these habitats would be identified and tracked in a manner a manner that is feasible for the property owner."" 2019 Comp Plan FTV Policy 4.1.E: ""Inventory and map trees and native vegetation resources to be preserve or managed in accordance with County Standards and create and maintain a database of these resources"" The County should have or be developing a database of these resources for property owners to use to identify trees and native vegetation. The LPAT Framework Plan also included mapping potential wildlife corridors. Additionally, VA DCR has wildlife corridor mapping tools and a Virginia Natural Landscape Assessment, which includes many of the ridgelines and steep slope areas in Loudoun County still having ecological integrity. This type of database could be integrated into the development/permitting process. 2019 Comp Plan FTV Policy 4.2.A: ""Prioritize the planting of native vegetation, specifically along those corridors that provide connections to other natural, environmental, and heritage resources."" Since the prioritization is for native vegetation, perhaps a calculation of percentage of native vegetation could be included to identify wildlife habitat. Since non-native grasses, forbs, shrubs, and trees provide fewer ecological services, utilizing such a calculation would remove turf lawn, ornamental trees, and many of the non-native vegetation (items that would otherwise be considered undeveloped or open space) that do not contribute as many ecological services to wildlife habitat. This would also provide an incentive to remove invasive vegetation (also a Comp Plan priority) if there are large stands of Autumn Olive and/or other invasive shrubs, vines, etc. 2019 Comp Plan NHR Policy 6 includes lots of language on habitats, corridors, and references to native vegetation, so it seems there is a need to adequately define habitat in the Zoning Ordinance. VA DCR could be consulted to include a

ID	Section
	definition that suits the needs of the Zoning Ordinance while being able to be understood by landowners and developers, and being able to be enforced by county staff. If this is still not clear, we would be pleased to meet with Staff.
#4763	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:10/5/2021	Staff will exploring including the legislative application checklist requirement in the MDOD supplemental application materials. We can refer to DCR mapping and database tools similar to legislative application checklist requirements for endangered species habitats.
#4342	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/27/2021	The deletions in E.1.a make the provision confusing. As written, it's not clear whether the 100 foot measurement is on both sides of the ridgeline or just on one side. f just on one side, who gets to choose which side? Put the deletions back in.
#4764	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:10/5/2021	This language was revised to respond to another comment. We can further revise the language for clarity.
#4209	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	General Comment: Why is October 1995 chosen as a reference point when citing pre-existing "conditions?"
#4213	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/15/2021	ZOAM-1995-0002 revised the MDOD section and was adopted on October 4, 1995 at the BOS Business Meeting.
#4208	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	According to the most recent Visit Loudoun publications, the "Wine Trail" includes 41 wineries; the "LoCo Virginia Ale Trail" includes 34 breweries, including 11 mis-labeled "Farm Breweries" apparently b/c they exist outside of "Leesburg Downtown", the "Purcellville Gateway" and the "Dulles Corridor."

ID	Section
	Protecting their businesses by limiting the number of additional allowed new alcohol-based venues serves everyone well. BRMCA
#4272	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Is this a comment for 4.03?
#4207	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	General Comment: Discussion of Limited Breweries, and Wineries at the 8/25/21 ZOC meeting was excellent on many levels: density; not really agricultural, nuisance factors, etc. and that fact that many of these rural entities are, in reality "road houses" and/or event centers. The point the of \$\$ they generate for County coffers was made, which in turn explains why the Department of Economic Development feels compelled to promote these businesses. Perhaps a slight shift in the axis of the DED could involve them in focus on the environmental leads Loudoun County is taking to protect the rural lands so popular with residents, employers/employees, and visitors alike.
#4271	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Is this comment intended for 4.03 or 3.06? Please advise.
#4206	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	The BRMCA experience with a Limited Brewery on Paris Mountain informed us that VDOT has requirements for access points based on estimates of daily in/out traffic, and as such required an engineered plan for access and egress; they mandated a 2nd driveway, which sadly resulted in further clearing. Experience in the past regarding a "retreat" on Paris Mountain revealed that VDOT required certain "line of sight" clearing from adjacent properties for multi-passenger vehicles (buses), thus requiring, in this case, possible permission from neighbors to clear parts of their own land as well.
#4270	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Please reference the text in 4.03 that you're referring to.
#4205	5.04 Mountainside Overlay District

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	GENERAL POINTS AND QUESTIONS 1. loudoun.gov , Forest Management, lists the benefits and values achieved in preserving forested lands 2. Experts around the globe emphasize that it is the preservation of “large swaths” of forest that afford the benefits listed; small patches here and there are insufficient. 3. MDOD lands should be preserved for residential use going forward, with minimum acreages established per lot = 20 acres 4. In MDOD lands a single use per property is permitted, not multiple uses, IF commercial activities are allowed at all. Setbacks, buffering, lighting and hours of operation are critical in protecting the value of existing properties. BRMCA
#4204	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.G.4.c PERFORMANCE STANDARDS IN HIGHLY SENSITIVE AREAS. What would be considered “minimal clearance” for roads and driveways? BRMCA
#4268	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Agreed. This is subjective and staff are seeking terms to clarify what minimal clearing is intended to mean.
#4203	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.G.1 PERFORMANCE STANDARDS IN HIGHLY SENSITIVE AREAS. IF commercial activities are going to be allowed in MDOD lands (they should NOT be), this section mentioned “dwellings” only. BRMCA
#4267	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	noted. Staff will seek to clarify text.
#4202	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.G. PERFORMANCE STANDARDS IN HIGHLY SENSITIVE AREAS. As above. MDOD lands should all be Highly Sensitive. BRMCA
#4266	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov	Staff has not proposed a change in the MDOD sensitivities.

ID	Section
Date:9/17/2021	
#4201	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.F.1 PERFORMANCE STANDARDS IN SOMEWHAT SENSITIVE & SENSITIVE AREAS. If dwellings, driveways, drain fields and wells are excluded from the lot clearing allowances, this works at cross purposes with conserving (environmentally sensitive) MDOD lands. Who/how will the degree of slope be documented? Additionally, if someone had 100 acres on relatively “flat” land, they could clear up to 50 acres, etc. Cross purposes again. Points that apply to all subsections: <ul style="list-style-type: none"> • Any permit must require a grading plan • Any permit must require documents as noted in 4.03.E.2 and 4.03.H as written • Focusing on soils/steepness is a hold-over from times when engineering materials, processes and equipment were such that safety concerns, without environmental concerns, dominated. Safety remains an issue, and steepness/soils could be addressed when Staff review a proposed activity containing required documents. • 4.03.F.1 does not reference “dwellings”; while 4.03.G below specifically does; if hairs are going to be split, must get consistency BRMCA
#4265	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	There are multiple sections / issues within this comment. Staff recognizes the limitations of 4.03.F.1 and will be working to develop a more appropriate standard. The criteria for developing the MDOD are based on public health, safety and welfare, which include environmental considerations.
#4200	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.F PERFORMANCE STANDARDS IN SOMEWHAT SENSITIVE & SENSITIVE AREAS. All MDOD lands should be considered in one category: Highly Sensitive. Doing so simplifies this section of the ZO. The definitions given in 4.03.C.1. as written are highly subjective. Doing away with this “hair splitting” is compatible with the 2019 Comp Plan, Chapter 2 in particular. BRMCA
#4264	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	The description of the areas in 4.03C.1.c are carry over language from the existing ordinance. Staff is can further revise these for clarity.
#4199	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.E.2. MOUNTAINSIDE RESOURCE PROTECTION SETBACKS. Subdivision of land. To aid applicants in the permitting process clear requirements for a copy of the plat, lot lines, streams, and footprint of proposed construction, roads, parking, lighting, etc.. with accurate measurements, and

ID	Section
	drawn by a licensed professional should be required, which protects Staff and optimally guides dialogue during the permitting process. You've referenced the same in 4.03.H below....Great!
#4263	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	The provisions in 4.03.H reiterate, supplement or are in addition to the plat requirements in the Facilities Standards Manual.
#4198	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.E.1.c. MOUNTAINSIDE RESOURCE PROTECTION SETBACKS. Spring Protection Setback. Same concerns as in (b) above BRMCA
#4197	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.E.1.b. MOUNTAINSIDE RESOURCE PROTECTION SETBACKS. Perennial Headwaters Setback. Given that certain uses create run off, erosion, pollutants, etc, setbacks should be no less than 300 feet. Why is a public reservoir mentioned for Catoclin Creek? BRMCA
#4261	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Appropriate setback distances are open for discussion. Staff will revisit sources proposed text regarding the public reservoir.
#4196	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.E.1.a. MOUNTAINSIDE RESOURCE PROTECTION SETBACKS. Crest & Ridgeline Protection Setback. There should be no exceptions for the items listed in 4.03.D; ridge- lines are either protected or not. Who and how will the 100 horizontal linear foot be documented and monitored? BRMCA
#4260	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Staff can consider appropriate uses or restriction of uses within the setbacks. Will contemplate whether any uses can be considered within the crest/ridgeline setback.
#4195	5.04 Mountainside Overlay District

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.D.3.b USES & ACTIVITIES. Special Exception Approval Required. Subdivision of land must be limited and specified by acreage. Someone could take a 5 acre lot and divide it into 3 parcels; once access roads, parking, construction footprint is added, the entire plat would be cleared. Acreages less than 15 should allow 10% clearing only, and 1 home. No commercial construction. In other words, must tie acreage size in somehow. BRMCA
#4259	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Please clarify. Note that this is implementing the 2019 GP policy, but staff is unclear where the acreage should be considered in this provision.
#4194	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.D.3.a USES & ACTIVITIES. Special Exception Approval Required. All MDOD lands should be considered “Highly Sensitive”, as the focus of the Comp Plan is on protecting these environmental resources, not based on steepness of slopes. Every activity listed in table 3.02.03-3 for ARN and ARS lands must be required when applied to MDOD lands. Some listed activities require Minor Exception only. Others such as “Banquet/Event Facility”, “Veterinary Service”, “Country Inn”, “Farm Machinery” “Feed and Animal Supply Center” potentially require large scale clearing, lighting, traffic, and noise. The best plan for Loudoun County’s MDODs is to restrict construction to residential only, with minimum acreage BRMCA
#4193	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.D.2.d USES & ACTIVITIES. Restoration & revegetation. Suggest including reference to native and/or pre-existing plantings to be clear. A reference to any number of sources lists these. BRMCA
#4257	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	revised to reference the reforestation standards in the FSM.
#4192	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.D.2.c USES & ACTIVITIES. Accessory Structures. Same concerns as above. Setbacks need to be substantial, at least 300 feet. BRMCA
#4191	5.04 Mountainside Overlay District

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.D.2.b.USES AND ACTIVITIES. Public trails, passive recreational activities, etc. Setbacks should be substantial to avoid public nuisance to adjacent private property owners. What are "passive recreation facilities?" A campground, with septic, parking, fire pits, lights, access roads, traffic? Must be very careful here. BRMCA
#4255	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Passive recreational uses: Recreational uses (such as hiking, nature observation, and picnicking) not requiring constructed facilities, but making use of areas which are largely left in their natural state except for basic facilities as bathrooms, benches, picnic tables, and trails.
#4190	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.D.2.a USES AND ACTIVITIES. Fences. Wording to assure that fences are appropriately camouflaged by native vegetation to protect adjacent property value/line of sight. A residence would not want to be looking at a "fence" made of cinder block, or other material disparate with the setting. Suggest a formal "permission" from adjacent neighbor(s). Fence vs wall definition. BRMCA
#4254	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	The provisions for fencing can be further defined.
#4189	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.C.2.c.3 APPLICABILITY & EXEMPTIONS. Expansion of Single Family Detached Dwelling. Setbacks must be preserved. Also, what about Critical Streams? BRMCA
#4253	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Any addition is subject to the general development standards and setbacks in the ordinance. The county does not define "critical streams" but for the purpose of this section, expansion of a SFD structure as defined in 4.03.C.2.c.3 is exempt from 4.02.E.1.b. Other restrictions (RSCR, USACOE, DCR) may apply.
#4188	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.C.2.b APPLICABILITY & EXEMPTIONS. Timber Harvesting and Silviculture. Same questions as above for Forest Management Plan. Will harvesting be limited to a certain percentage of acreage/time unit? Replanting requirements? BRMCA

ID	Section
#4252	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Timber harvest operations are exempt provided they are conducted in accordance with the approved Forest Management Plan, the components thereof defined in the County's Facilities Standards Manual.
#4187	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.C.2.a APPLICABILITY & EXEMPTIONS. Agricultural Operations. It will be critical to define the terms agriculture, horticulture, animal husbandry. How will applicants document they have a Conservation Farm Management Plan in place? What are the requirements of a CFMP? Will the land so specified required a certain acreage of actual crop production? Will clearing be limited to a certain percentage of acreage? It must be clarified that the permitted uses in ARN and ARS (Table 3.02.03-3) DO NOT automatically extend to MDOD lands, which OVERLAY these districts. BRMCA
#4212	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/15/2021	Staff is reviewing the exemptions text with the County Attorney's Office.
#4186	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.C.1.c. APPLICABILITY & EXEMPTIONS. The terms have changed from "soils" to "areas." How will the sensitivity of each area be determined? All MDOD lands are Highly sensitive due to their function in air and water cleansing, habitat, air cooling, storm water management, critical stream protections, and the attractive ambiance they provide for the County, the latter of which helps rural businesses. BRMCA
#4211	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/15/2021	The only change to this section was updating the name of the map from "Mountainside Protection Area Map" to "MDOD Map." No changes to the sensitivities or their delineations.
#4185	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.C.1.b APPLICABILITY & EXEMPTIONS. It sounds like a map specific to MDODs is either available or planned. The map in the 2019 Comp Plan labeled "Natural & Environmental Resources" contained in Chapter 3-34 is confusing as it separates out Very Steep slopes, moderately steep slopes, wooded areas, and Mountainside Overlay BRMCA 4.03 Draft Review ZOC 9/15/21 Blue Ridge Mountain Civic Association est. 2003 BRMCA District as separate entities

ID	Section
	(colors). Is it possible to clarify exactly each MDOD based on elevations above valley floor, and have a map that clearly shows exact MDOD boundaries? (Paris Mountain, Catoclin Mountain, Short Hill Mountain, Bull Run Mountains and Hog Back Mountain) BRMCA
#4251	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Staff are producing a map for ZOC review. Since the boundaries of the somewhat sensitive, sensitive and highly sensitive areas have not been proposed to change, the MDOD maps may also be view using the County's online mapping, webLogis. Elevations are based on the elevation above mean sea level.
#4184	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.A. PURPOSE: bullet point #7. The term "implement" might imply to some that there are specific "how to" requirements in the Comp Plan. Would wording such as: "To address and incorporate the directives of the 2019 Comp Plan as applicable to environmentally sensitive lands" better state the intent of 4.03? (BRCA)
#4210	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/15/2021	Staff will take this under consideration.
#4183	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/14/2021	4.03.A PURPOSE. Does this mean there will ONLY be low-density RESIDENTIAL, and no COMMERCIAL development allowed in MDODs? We hope so. Will "low-density" be clearly defined? (Blue Ridge Civic Association)
#4250	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Uses permitted or by SPEX in the underlying districts are permitted, or by SPEX, in the MDOD if the performance standards are met.
#4062	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/13/2021	MDOD There should be some deminimus standards for marking MDOD areas as were established for steep slopes. We don't want a thin line along a fenceline, nor leopard spots all over. There should be a minimum area and minimum width.

ID	Section
#4097	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	We are open to any feedback for improving the definition and delineation of MDOD features.
#4061	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/13/2021	MDOD 1) Will we be using the existing GIS maps for identifying the MDOD areas? 2) What is the basis of the designations? 3) If we believe that one of the factors is erroneous, what is the process to change the designation?
#4098	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	1) Yes, there are no proposed changes to the limits of the existing mapped MDOD (no new areas proposed to be added or removed to the overlay district). New features within the MDOD will be shown on the MDOD map. 2) The basis for the features protected by new setbacks is the 2019 General Plan, including but not limited to policies such as Chapter 3, Action 3.3.E Chapter 2, Action 2.1.C, and Chapter 3-7, "Forests, Trees, and Vegetation". 3) The Zoning Administrator will be permitted to make map interpretations under this zoning ordinance, similar to the Zoning Administrator Map interpretation procedures of the R93 ZO.
#4059	5.04 Mountainside Overlay District
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:9/13/2021	4.03.E.1.b.Why is this limited to Catoctin and Goose Creek? There are critical headwaters in other watersheds as well, including:Piney Run, Dutchman's Creek, Quarter Branch, Limestone Branch and Direct to Potomac.
#4099	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	this regulation was added in an attempt to respond to 2019 GP policy 2.1.C "Establish appropriate regulations for Catoctin Mountain, Short Hill Mountain, and the Blue Ridge Mountains to limit diversions of water from the Catoctin and Goose Creek headwaters and prevent stream pollution". However, we can explore covering more and/or all headwaters with the new setback.
#4005	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	"4.03 MDOD Definition. Why was the definition of ""Ridgeline"" modified to remove the text, ""A line measured continuously along the highest elevation of a drainage divide for the major watersheds mapped by the County or other prominent mountain ridges visible from the public right-of-way as identified during the land development process."" "

ID	Section
#4034	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	"4.03 MDOD . Why was the following text that most clearly outlines the establishment of MDOD removed (or moved) from the initial description of MDOD? Can Staff reinstate or confirm where equivalent text is located? The Mountainside Development Overlay District is hereby established as an overlay district, meaning that this district is overlaid upon other districts and the land so encumbered may be used in a manner permitted in the underlying district only if and to the extent such use is also permitted in the overlay district." 4.03 MDOD -- Procedures as outlined in Current Zoning Section 4-1606. Will these all be included in the Procedures Chapter verbatim? If not, what text changes are/will be made?
#4102	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	similar to LOD comment, a general overlay district definition will be provided explaining that an overlay district is a zoning district overlaid upon other zoning districts. The latter portion "land so encumbered may be used in a manner permitted in the underlying district only if..." describes the permitted uses of the overlay district and has been relocated to 4.03.D. We can make further adjustments to the language of 4.03.D for clarity.
#4175	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	There are two definitions shown side-by-side in the redlined PDF. The first definition was removed in favor of the latter definition, which is consistent with the definition of a ridgeline provided in the Code of Virginia.
#4020	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	"4.03.H MDOD Supplemental Application Materials. 1. Administrative Applications and Proposed Covered Activities. This whole section justifies the earlier request for coordination between departments beyond Building & Development. The July 2021 change in Code of VA will allow LOCAL county management of the Health Department (vs. as a State agency). As it was requested by Loudoun County and will be likely to be adopted by Loudoun, it would be prudent (required?) to consider the departmental coordination and requirements NOW to close the known loopholes. Therefore, will all planning ZOR regulations anticipate this change in the event it is implemented by Loudoun County by formal ZOR adoption? "
#4104	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	Based on the "Covered Activities" section, all applications, land disturbances, land disturbing activities, and uses are covered by the MDOD regulations. We agree on the importance of interdepartmental coordination and can consider any additional feedback for references to other departments in this subsection/language. However, a locational clearance is provided by the Department of Building and Development. If you would like to require a review of

ID	Section
	a locational clearance by other County departments, please advise on the specific department(s).
#4019	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.03.G MDOD. For clarity for ALL zoning ordinance users (not just developers), can/will you better describe and/or provide links to explain G.6.c. language intent: "Such other standards which are relevant, including Section 6-1310 7.09 Issues for Consideration and Section 1-102 1.02, Purposes of Zoning Goals, Purpose, and Intent."
#4105	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	There are no other specific standards. In this case, this language has functioned as a reference to 7.09 and 1.02. We are open to any feedback suggesting additional standards. Be advised that specific language is limited language.
#4018	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.03. MDOD. Conflicts/loopholes between C, F and G. What under any other circumstances would require a grading permit is being allowed for a "Forest Management Plan" that has known prior disclosure of SFD development plans. This process loophole is actually even enabled with G.6.b. by not requiring Health Department groundwater (and septic) until the "record plat" stage (for lots after 10/4/95). How will this be addressed?
#4173	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Open for discussion. Staff recognizes the existing performance standards have expressed loopholes as commented, in the past.
#4017	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.03.G MDOD. Performance Standards in Highly Sensitive Areas. G.2. Formatting error.
#4106	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	Acknowledged. Unfortunately this is an enCodePlus error that will need to be addressed with enCodePlus. A maintenance request will be submitted.

ID	Section
#4016	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	MDOD F.2 and G.4 Performance Standards. There seem to be so many workarounds for getting houses built. Submissions received that recommend against allowing ANY additional clearing beyond what is necessary for the house itself and drainfield. i.e., no additional allowance for "yard." This complies with Commission of Revenue assessment of MDOD properties, correct?
#4112	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	we can consider further limiting clearing for allowed residential uses. However, it may not be possible to require that another requirement of the zoning ordinance not be provided.
#4015	5.04 Mountainside Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/13/2021	Under Purpose, Is there some reason why we are singling out 4.03 to mention 'implement the comprehensive plan?' The entire ordinance is supposed to implement the plan.
#4110	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	Agreed. this purpose statement is redundant and has been removed.
#4014	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.03.F MDOD F. Performance Standards in Somewhat Sensitive and Sensitive Areas. 3. Shouldn't grading plan also consider runoff (direction and velocity) in addition to minimizing erosion?
#4249	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	A grading permit is reviewed for compliance with the Virginia Erosion & Sediment Control Handbook, as well as Loudoun County Codified Ordinance Chapter 1220.
#4013	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc	4.03.E MDOD E. Mountainside Resource Protection Setbacks. 1.a. Crest and Ridgeline Setback. Shouldn't the setback be greater than 100'? Shouldn't this setback be measured from the edge of the ridgeline and not the crest? There are

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:9/13/2021</p>	<p>potentially some fairly flat ridgelines and this setback may not necessarily adequately protect the ridgeline.</p>
<p>#4156</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021</p>	<p>to address this comment, the setback could be revised to apply to the ridgeline rather than the crest.</p>
<p>#4012</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021</p>	<p>4.03.D MDOD. D.2.b&c This is another example of passive recreation term being used without clear definition.</p>
<p>#4109</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021</p>	<p>these uses and definitions should be defined in Chapter 11. Unfortunately, some references to passive recreation are taken directly from use lists provided in the 2019 GP. For example, this is intended to implement 2019 GP Chapter 3, Action3.3.G "Seek the expansion of passive outdoor recreational opportunities in mountainside areas, including the development of public park sites and improving access to existing recreational facilities such as the Appalachian Trail."</p>
<p>#4010</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021</p>	<p>4.03.D MDOD Uses and Activities. As PUBLIC RECORDS (onlineme.com) show, regulation of high-intensity uses requiring large parking areas formed from clear cutting/land disturbance (with or without a grading permit) has impacted septic fields on the property. This is not only a health, safety and welfare concern for the property owner and patrons, but definitely on a mountainside, a concern for down hill properties. The Covered Activities list is insufficient to ensure protection for citizens and patrons, therefore will high-intensity uses be EXCLUDED from the MDOD Use Matrix list?</p>
<p>#4170</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021</p>	<p>We can look into a review of MDOD permitted uses, but may be constrained by what is (or isn't) explicitly covered under the 2019 GP and the Code of Virginia.</p>
<p>#4009</p>	<p>5.04 Mountainside Overlay District</p>

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	"4.03 MOUNTAINSIDE DEVELOPMENT OVERLAY DISTRICT (MDOD). C.2.b Exemptions, Timber Harvesting & Siviculture. Does the County ensure or monitor the requirement below and ENFORCE when presented with KNOWN violations? (Recent examples indicate the answer may be no and need to be addressed.) Section 10.1-1181.2.H of the Code of Virginia. Prior to completion but not later than three working days after the commencement of an operation, the operator shall notify the State Forester of the commercial harvesting of timber. . . . The notification may be verbal or written and shall (i) specify the location and the actual or anticipated date of the activity, (ii) include an owner's name or the owner's representative or agent and contact information, and (iii) be provided in a manner or form as prescribed by the State Forester. If an operator fails to comply with the provisions of this subsection, the State Forester may assess a civil penalty of \$250 for the initial violation and not more than \$1,000 for any subsequent violation within a 24-month period by the operator. Such civil penalties shall be paid into the state treasury and credited to the Virginia Forest Water Quality Fund pursuant"
#4179	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The County communicates with and inquires from VDOP when timber operations are reported. The VDOP does not have any notification requirement to the County. If an operation or activity is not covered by the State Forester, then the County pursues zoning enforcement.
#4008	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.03 MOUNTAINSIDE DEVELOPMENT OVERLAY DISTRICT (MDOD). C.2 Exemptions. How will the coordination between applications for Zoning, B&D, Health Dept./ODW, Loudoun County Soil and Water Conservation District (LCSWCD), Natural Resources and Conservation Service (NRCS) be addressed in ZOR to close known loopholes? Example available upon request.
#4155	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	We would be happy to consider any examples of procedures regulations that cover interdepartmental reviews.
#4007	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.03.C MDOD. [related to another entry] 2.b. What is being done to protect steep slope areas from being denuded of tree cover and then being graded for high-intensity rural uses tourist venues that require substantial parking?
#4153	5.04 Mountainside Overlay District

ID	Section
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	We can look into additional ways to prevent forest management leading to grading and development. However, there may be limited options for addressing this issue in agriculturally zoned areas under Code of Virginia.
#4247	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Timber harvesting and silviculture, exempt uses with an approved Forest Management Plan, include regeneration / reforestation. Without regeneration/reforestation, it is no longer that use, and thereby subject to the MDOD and performance standards.
#4006	5.04 Mountainside Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.03.C MDOD. C. Applicability and Exemptions 1.c 1-3 What are the definitions for slight or limited, moderate, and severe environmental and public safety impacts?
#4172	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Carry over language from existing text. This will take further research to determine the intent and use of these terms during the original drafting.
#3978	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	4.03 MDOD F.3. Performance Standards in Somewhat Sensitive and Sensitive Areas: Roads and driveways of up to 16% are permitted today, which helps decrease the area of lands disturbed. Why introduce a new, different standard? Should this be in the FSM rather than the zoning ordinance?
#4171	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	This text was revised to align with the standards from Fire & Rescue, where the maximum centerline grade can be 14%. The FSM must be revised too, but has been administered at the 14% maximum since receiving direction from Fire & Rescue.
#3977	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	4.03 MDOD F.2,4&5 Performance Standards in Somewhat Sensitive and Sensitive Areas: SOILS What is the basis for these soils being made off-limits for disturbance?

ID	Section
#4246	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Again, this is carry-over text from the existing ordinance. However, these soil mapping units are identified based on their geomorphic instability and genesis.
#3976	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	4.03 MDOD F.1. Performance Standards in Somewhat Sensitive and Sensitive Areas: SLOPES We already have performance standards for steep slopes. Why do we need another such set of regulations here?
#4245	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	This is carry-over text from the current ordinance. We can consider better standards that achieve the purpose and intent.
#3975	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	4.03 MDOD F. Performance Standards in Somewhat Sensitive and Sensitive Areas: Look at the areas already depicted on County GIS maps as Sensitive or Somewhat Sensitive. You will be surprised. Much of Paeonian Springs is in these areas, including my back yard where "forest," a few black walnut trees are treated as forest.
#3974	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	4.03 MDOD F. Performance Standards in Somewhat Sensitive and Sensitive Areas: How are these areas determined? What is the basis? Being wooded seems to be a major factor. Would this generally render all wooded areas as preserved areas?
#4166	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	These areas are the same as the existing areas. No change in criteria has been proposed.
#3973	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc	4.03 MDOD F. Performance Standards in Somewhat Sensitive and Sensitive Areas: This expands the standards for very sensitive areas to much more land.

ID	Section
<p>zicht@erols.com Date:9/12/2021</p>	<p>What is the justification?</p>
<p>#4162</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021</p>	<p>Please clarify. 4.03.F are performance standards for somewhat sensitive and sensitive areas and are carry over language from the existing ZO.</p>
<p>#3972</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021</p>	<p>4.03 MDOD E.1. b Perennial Streams & c What is good for the goose is good for the gander. How is an exclusion for one particular case justified? Spot and discriminatory zoning in the worst way.</p>
<p>#4107</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021</p>	<p>The intent here is to expand the permitted use of property in a manner that is consistent with the policies of the 2019 GP and implements the Loudoun County Linear Parks and Trails plan.</p>
<p>#3971</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021</p>	<p>4.03 MDOD E.1. b Perennial Streams What is the basis for a 100-foot setback? Often, such a setback would go beyond the limits of a long, narrow contributory watershed.</p>
<p>#4154</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021</p>	<p>That is a valid point in specific circumstances. Perhaps language can be considered to specify "the maximum extent of the contributing watershed or 100 feet, whichever is less" thereby acknowledging dissected landscapes where drainage divides occur within 100 feet.</p>
<p>#3970</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021</p>	<p>4.03 MDOD E.1. b Perennial Streams Why are these streams set out in particular?</p>
<p>#4161</p>	<p>5.04 Mountainside Overlay District</p>
<p>By: Ryan Reed</p>	<p>Staff will look into why only these two streams were specifically identified.</p>

ID	Section
Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	
#3969	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	4.03 MDOD E.1.a Crest & Ridgeline Protection What is the basis for this setback? Generally these areas are developable without undo impact on health or safety. Isn't this something where the landowners should receive compensation for public benefit at cost to a select few?
#4120	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	New Ridgeline protective setbacks are intended to implement 2019 GP Chapter 3, Action 3.3.E. County programs for encouraging easements and other tools for property owners could be addressed outside of the Zoning Ordinance.
#3968	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	4.03 MDOD D-3.b Special Exception for Subdivision Question whether such a requirement is reasonable and consistent with state code.
#4118	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	We can look into this further. The subdivision requirement applies only to sensitive and highly sensitive MDOD areas, and the requirement is taken directly from 2019 GP Chapter 3, Action 3.3.F "Require special exception approval for the subdivision of properties into three or more lots in Sensitive and Highly Sensitive Mountainside Areas"
#3967	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	4.03 MDOD D-Uses There are not sufficient economically viable uses for the land owners.
#4116	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	4.03.D.1 has been revised for clarity. The permitted uses of the underlying zoning district are still permitted within the MDOD.

ID	Section
#3966	5.04 Mountainside Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	4.03 General Much of the land that would be placed off limits is generally considered developable and is already developed as homes, rural businesses and large federal installations. The differential treatment of new and expanded uses would be inequitable.
#4159	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Please clarify. Is this regarding the proposed setbacks? Otherwise, the existing MDOD is not being changed.
#3955	5.04 Mountainside Overlay District
By: John Merrithew Tags: zoc Date:9/11/2021	Per H.c. Can a grading permit be granted before a location clearance?
#4158	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	No, all grading permits within the MDOD are reviewed for locational clearance prior to approval.
#3954	5.04 Mountainside Overlay District
By: John Merrithew Tags: zoc Date:9/11/2021	E.1. If I understand the measurement correctly, shooting out horizontally 100 feet from the crest does not necessarily reflect the grade change. In some case like AT&T, the grade change is slight and so any structure still has a visual impact (visual impact is clearly the community interest). Would it be better to related the horizontal distance to the height of the structure or conversely require the height of any structure not exceed the elevation of the crest?
#4133	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	Agreed that the setback does not directly address the visual impact of a telecommunications structure. It appears that Section 15.2-2295.1. of the Code of Virginia specifically exempts telecommunications structures from the regulation of "Tall Buildings or structures". "Tall buildings or structures" does not include (i) water, radio, telecommunications or television towers or any equipment for the transmission of electricity, telephone or cable television;" Horizontal distance vs. height ratio can be considered, or other height restrictions in these areas.

ID	Section
#3947	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/10/2021	4.03.F. Density in a MDOD must be discussed. I suggest 40 acres per SFD, though many small parcels would be grandfathered at one SFD each. While density is not being revisited in the RPA, it should be discussed for MDODs and would not be as politically sensitive.
#4140	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	Zoned density is established by the 2019 GP. There do not appear to be any density limiting policies explicitly provided in the 2019 GP, and this would need to be explored as a separate issue.
#3946	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/10/2021	4.03.D.3.a If a SPEX is required in sensitive areas, is a SPEX required in Somewhat Sensitive and Highly Sensitive areas? Or those areas simply off-limits to new development?
#4157	5.04 Mountainside Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	A SPEX is required for land disturbing activity in Highly Sensitive areas. Uses and activities in somewhat sensitive and sensitive are subject to the performance standards.
#3945	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/10/2021	4.03.D.1 I recall that the existing ZO permits any uses in the underlying district, such as AR1, to be permitted in a MDOD. This must be changed and the ONLY PERMITTED USE in a MDOD should be single-family residential, with these performance standards: Limited to one story. Predominately of earthen tones. Minimize reflectivity, to include using bronze-tinted glass instead of clear glass.
#4169	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	We can consider reviewing the permitted uses in the MDOD. However, agriculturally zoned districts underlie the majority of the MDOD. We may be limited in the number of use restrictions that can be applied based on the applicable base zoning districts.
#3944	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com	4.03.D.1 This is confusing. There should be a very clear statement of what uses are permitted.

ID	Section
Date:9/10/2021	
#4149	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	Agreed. We have revised the language in 4.03.D.1. and are open to any additional feedback for improving/clarity.
#3943	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/10/2021	4.03.C.2.c.2 Add this to the provision: "...or increase its height."
#4151	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	revision confirmed.
#3942	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/10/2021	Ad additional Purpose in 4,03.A: "Ensure that Mountainsides remain a distinctive feature of Loudoun's scenic beauty." My rationale: To include protecting mountains' aesthetic attributes as one of the ZO's Purposes for the MDOD.
#4148	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	The purpose statement has been revised to reflect the language from the 2019 GP as suggested.
#3941	5.04 Mountainside Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/10/2021	4.03.C.1.a STRONGLY suggest that MDODs be defined using exact language from the GP, Glossary p. 14: General Plan, Glossary p 14: Mountainside Areas: Areas associated with the County's mountain features, categorized based on weighted criteria as defined in the Loudoun County Interpretive Guide to the Use of Soils Maps, and defined by the following: <ul style="list-style-type: none"> • Elevation: Above 700 feet mean sea level for the Short Hill and Blue Ridge Mountains and 550 feet for the Catocin, Hogback, and Bull Run Mountains; • Soils: Associated with mountainsides that affect groundwater recharge, slippage potential, and suitability for onsite sewage disposal systems;

ID	Section
	<ul style="list-style-type: none"> • Slopes: Moderately steep slopes (15 to 25 percent) and steep slopes (greater than 25 percent); and • Forests: The quality and extent of tree cover, woodlands, and forests.
#4144	5.04 Mountainside Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/14/2021	We will look into revising the description of Mountainside Areas in 4.03.C.1.a to incorporate the Glossary definition from the 2019 GP.
#4058	New construction
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	New Construction: I agree with Kevin that this is very confusing, and some other description in the text with a different definition would be helpful.
#3936	New construction
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/9/2021	'New Construction' is a very misleading term. Why use the word 'New' when referring to something which is already in place? What's wrong with using 'Existing' instead? This is still distinctly different than an 'Historic Structure'.
#4057	Floodway
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	If Loudoun is allowed to change the definition of floodway to eliminate the existing management questions regarding tree planting limitations/regulations, the words "as regulated as" in the second sentence of the definition should be deleted.
#12965	Floodplain
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/16/2022	F.6. Special exception uses--active and passive recreation. These or any uses and accessory uses in this section that exceed 3% imperviousness should not be allowed due to the protective value of the riparian cover in floodplains.
#12964	Floodplain
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/16/2022	E.2.Allowing increases in base flood elevation and not allowing tree planting in the minor floodplain does not make sense. Tree planting does not increase flood levels, and should be allowed. Altering/raising the floodplain to allow uses in the underlying zoning district means the floodplain on downstream properties may be affected. This should not be allowed. In addition to parking lots, basketball courts, tennis courts and swimming pools should also not be allowed.

ID	Section
#12963	Floodplain
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/16/2022	Due to a glitch in this section that doesn't allow comments on anything but the definitions, I'm entering comments about floodplain-related permitted uses here. E.1.h. Parking areas for permitted uses or otherwise not addressed (E.2.f) should not be permitted in the major or minor floodplain. Only permeable surfaces should be allowed. Flooding is likely to increase with climate change, and putting impervious cover here negates the absorptive and slowing value of natural vegetation in the floodplain and riparian area.
#12962	Floodplain
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	E.1.b.States that active recreation is an allowed use in the major floodplain, in conflict with the Comp Plan and the RSCR section. Active recreation should be deleted. 3% imperviousness in the floodplain is an arbitrary number.
#7028	Floodplain
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:1/10/2022	1 This needs to be a separate ZOAM. Fencing, trees and pasture etc. need to be studied and resolved. Why is agriculture more restricted in terms of fencing while it appears a chain link back stop to a ball field is permitted? 2.The verbiage for LPAT that is included in MDOD needs to be added to Floodplain
#3928	Floodplain
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/9/2021	Is a floodplain only for 100-year floods? I'd think it should include lesser floods, perhaps to a 50-year standard.
#4056	Base flood
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	Base flood. Not sure where best to make this comment--but with the apparent increase in frequency of 100-year floods, have any changes to base flood been considered to avoid negative impacts to economy and development?
#9747	Alteration
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/22/2022	shouldn't stream restoration be listed as a permitted use, consistent with the comp plan?

ID	Section
#4055	Alteration
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	The issue of tree-planting in the floodplain is currently included as a land disturbing activity. Please take care that any resolution to the issue doesn't get tripped up by the definition.
#3927	Alteration
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/9/2021	Should be ANY cross section, not THE cross section.
#4004	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.K FLOODPLAIN OVERLAY DISTRICT K.4.c. Why isn't degradation of wildlife habitat or other natural features included?
#4130	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	FEMA's required regulations focus on flood risk. During ZOAM-2015-0003 staff were directed to not add any regulations beyond the minimum required by FEMA. RSCR Development Standards may consider wildlife habitat and other natural features.
#4580	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:10/4/2021	"Response #4130 by Ryan Reed, 9.14.21. "During ZOAM-2015-0003 staff were directed to not add any regulations beyond the minimum required by FEMA."" Did staff receive similar guidance for the Zoning Ordinance Rewrite process? Why doesn't Loudoun do better than minimum FEMA requirements to protect the environment?" (Loudoun Wildlife Conservancy)
#4759	5.03 Floodplain Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:10/5/2021	Staff plans to administer flood hazard mitigation regulations (which are designed to achieve programmatic compliance with specific state and federal programs and regulations intended to reduce flood hazard risk) under the FOD separately from regulations focused on environmental conservation of the floodplain (which implement Loudoun County river and stream corridor resource policies from the 2019 General Plan). New river and stream corridor resource regulations will be drafted in Chapter 5: Development Standards.

ID	Section
#4053	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.J. Density Calculations. Floodplain acreage was included in density calculations in part to help offset higher environmental standards adopted with the current zoning ordinance. There should be a review of all the environmental standards that have been loosened since adoption of the current ordinance to be tightened up again, in order to both mitigate development impacts and protect natural resources as originally intended.
#4150	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement. Have standards been loosened or loopholes realized? Further discussion when the subsequent FOD revisions are initiated.
#4052	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.I.2.a.This section also indicates that new structures would be allowed in the floodplain which doesn't conform with the Comp Plan. IF there are any existing buildings in the floodplain that could be improved per these guidelines, the larger rainfall events that have been frequenting our area should be reason to avoid creating the potential for greater loss (and negative economic impacts) to individuals as well as buildings. This should not be allowed.
#4147	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4051	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.I.1.d. Are newly placed manufactured homes or any new homes allowed in FOD? If not, any reference to new residential construction is confusing and should be adjusted. Or does this reference cases where a lot is fully within the floodplain? If that's so, it would be better to address in a way that's not confusing.
#4146	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.

ID	Section
#4050	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.I.1.a. typo--MPOD
#4145	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	fixed, thank you.
#4049	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.H.2.b.1. If existing conditions are degraded, doesn't this section allow further degradation? What structural changes could be included to keep mean velocity from increasing at the downstream end?
#4240	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	This comment can be more fully understood and contemplated when staff revise the FOD. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4045	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.F.6 Active recreation uses should be eliminated to match the Comp Plan. 10% impervious cover for these uses should be eliminated due to the negative correlation with stream health and water quality. Incremental impacts add up.
#4142	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4044	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.F.5. Structures in the floodplain are problematic due to flood and imperviousness concerns. These impacts add up and should be kept to the 840 sf of floor area for incidental structures.

ID	Section
#4143	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4043	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.F.3 Riding stables. Stables are generally created with paddocks and turn-outs for the horses. As a special exception use, can it be specified that the design of use would be such that the stable buildings themselves should be located outside of the floodplain, while allowing the paddocks to be in the floodplain?
#4139	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4042	5.03 Floodplain Overlay District
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.F.2 Would you have an example of a special event with land disturbing activity that might require use of the floodplain? What is the maximum length of time that might be permitted?
#4241	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	This may be better termed "development" instead of "land disturbing activity" to better align with FEMA terminology. We do not have an example currently, but we can be prepared when this section is revised. Also, the maximum length of time can be specified. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4041	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.E.2.f. For reasons stated above, parking areas should not be permitted in the FOD. Floodwaters are naturally slowed and absorbed with the presence of natural vegetation. The county should take maximum advantage of such natural system benefits.
#4138	5.03 Floodplain Overlay District

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4040	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.E.2.b Same issue identified as a potential loophole in 4.02.E.1.k
#4136	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4039	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.E.1.k The last sentence of this section which states that areas within approved floodplain alterations that are then no longer in the FOD can be used for any use in the underlying zoning district, has previously been used as a loophole to then place structures and other uses in the former floodplain area. This further degrades the purpose and intent of the floodplain overlay district and should be reconsidered.
#4141	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4038	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.E.1.h Parking accessory to permitted or special exception uses in the FOD should be struck. Parking areas increase imperviousness which correlates to poor stream health and reduced water quality. Allowing parking increases the potential for vehicle-related pollution to enter streams during floods.
#4135	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.

ID	Section
#4037	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.E.1.a This section could allow non-farming uses in the floodplain. Here's another place that would benefit from a definition for farming and then it should be substituted for the word agriculture here.
#4137	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4036	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.E.1.b Remove active recreation as a permitted use to comport with the 2019 Comp Plan.
#4134	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4035	5.03 Floodplain Overlay District
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02.E.1.b.Impervious cover has a direct correlation to reduction in stream health and water quality. In the current ordinance, changes were made to the way that density is calculated to allow the inclusion of floodplain areas (not previously allowed) as a trade-off for greater environmental protections during development. Over time, those protections have been eased. The 3% imperviousness in the floodplain is an example. This should be eliminated.
#4132	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4033	5.03 Floodplain Overlay District

ID	Section
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/13/2021	4.02 D.2.i Currently tree planting is not allowed without floodplain studies and alterations. If something changes to allow this in the future, will the language in the ordinance still prevent it? The language should be written so as not to trip up fixing the existing problem.
#4131	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4003	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.K FLOODPLAIN OVERLAY DISTRICT K.4.a. What is definition of "good and sufficient cause"? 4.02.K FLOODPLAIN OVERLAY DISTRICT K.4.b. What is definition of "exceptional hardship"?
#4242	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	When the FOD is revised, we can be sure to bring in the federal definitions for clarity. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4002	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.J FLOOD PLAIN OVERLAY. J. Density Calculations. With all the specific requirements and restrictions for FOD, why is the land area still being used as part of the land area calculation for density? Will this be at least discussed for ZOAM-2020-0002?
#4129	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#4001	5.03 Floodplain Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/13/2021	if the purpose is to conserve the natural state of watercourses, etc, why are buffers not included in 4.02? Are they just in the Plan or what?

ID	Section
#4128	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Staff have attempted to address buffer in the RSCR Development Standards.
#4000	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.I FLOOD PLAIN OVERLAY I.4. Standards for Subdivision Proposals. That's all? With all the other details this gets only a, b, c?
#4243	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	When this section is revised, we can consider appropriate standards for subdivision proposals. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#3999	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.I FLOOD PLAIN OVERLAY. I.1.k. The requirement for prior approval from U.S Army Corp of Engineers, Va DEQ and VA Marine Resources Commission should STAY in the Zoning Ordinance for visibility.
#4127	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Yes. It will stay.
#3998	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.I FLOOD PLAIN OVERLAY. I.1.a. acronym "MPOD*" -- is this incorrectly identifying MDOD? and what is the asterisks representing?
#4125	5.03 Floodplain Overlay District
By: Ryan Reed	Drafting mistake. Corrected.

ID	Section
Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	
#3997	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.H FLOODPLAIN OVERLAY DISTRICT H.2.b. Why isn't there priority to protect natural features (wetlands, native plants, etc), that benefit water quality and have flood water runoff benefits, required for floodplain alterations?
#4126	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	<p>The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.</p> <p>Also, the RSCR Development Standards may be a place to considered these protections now.</p>
#3996	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.G FLOODPLAIN OVERLAY DISTRICT G.7. "Substantial damage" is defined but not "significant damage," which is the term used here. Can this be clarified and/or defined?
#4124	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	These terms can be standardized when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#3995	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.G FLOODPLAIN OVERLAY DISTRICT G. Standards for Special Exceptions. Why aren't requirements included to look at cumulative impacts of special exceptions and development in general? Handling this decisions on a case by case basis has led to a cumulative negative impact on the watersheds in the area. Why don't these standards include impacts to wildlife, native vegetation, and wetlands that may occur within the floodplain? Beyond being addressed in Chapter 5 for Development Standards, native vegetation has positive impacts on reducing stormwater flows, velocities, and other impacts to the floodplain.

ID	Section
#4273	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	When the engineering study is conducted, the applicant must consider all existing and proposed development within the watershed.
#3994	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02 FLOOD PLAIN OVERLAY. F.5 Special Exception Uses. How can the county/FEMA continue to allow the 840 square foot structure allowance without any engineering study or CLOMAR, but deem tree planting or woven wire fencing an impact requiring these measures?
#4123	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	An engineering study (Floodplain Alteration) is required per 4.02.H.2 and an increase in base flood elevation is not permitted for F.5 uses. The engineering study is a FEMA requirement.
#3993	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.F FLOODPLAIN OVERLAY DISTRICTS 2-6 Why are these uses allowed by special exception? Except for passive recreation uses (such as trails for the linear parks and trails system), these uses are unnecessary in a minor floodplain and do not contribute to protecting water quality.
#4244	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	These were carried over from existing text prior to ZOAM-2015-0003. Staff did not remove any uses unless FEMA required those uses to be removed. We can consider appropriate SPEX uses during the revision of the FOD. 4.02.G FLOODPLAIN OVERLAY DISTRICT G. Standards for Special Exceptions. Why aren't requirements included to look at cumulative impacts of special exceptions and development in general? Handling this decisions on a case by case basis has led to a cumulative negative impact on the watersheds in the area. Why don't these standards include impacts to wildlife, native vegetation, and wetlands that may occur within the floodplain? Beyond being addressed in Chapter 5 for Development Standards, native vegetation has positive impacts on reducing stormwater flows, velocities, and other impacts to the floodplain.
#3992	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc	4.02.E FLOODPLAIN OVERLAY DISTRICT 2.f. Why are parking lots permitted uses? Regardless of following best practices, it would be simpler (and provide better water quality benefits) if they were not allowed.

ID	Section
Maura@Walsh-CopelandConsulting.com Date:9/13/2021	
#4121	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Parking lots are only permitted when accessory to a use that is permitted within the FOD, Major.
#3991	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.E FLOODPLAIN OVERLAY DISTRICT 2.e. Why are basketball or tennis courts, and swimming pools permitted uses in the minor floodplain? They unnecessarily add impervious surfaces.
#4117	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Prior to ZOAM-2015-0003, these uses were permitted in the FOD, Minor. During the process of that revision, staff was directed to only increase the regulations to the minimum that FEMA required as a result of a Community Assistance Visit (CAV). FEMA does not regulate FOD, Minor.
#3990	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.E FLOODPLAIN OVERLAY DISTRICT 1.i. What is the definition of bulk storage of gasoline, chemicals, fuels, or similar substances? Since those chemical are a threat to water quality, why are incidental structures that would store machines that utilize those chemicals allowed in the FOD at all? Shouldn't incidental structures just be removed from permitted uses?
#4115	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#3989	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.E FLOODPLAIN OVERLAY DISTRICT 1.h. Why are accessory parking areas a permitted use?

ID	Section
#4083	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Only those parking areas that are accessory to a use that is permitted in the floodplain.
#3988	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.E FLOODPLAIN OVERLAY DISTRICT 1.b. Why are active recreation uses allowed at all within the FOD major floodplain? Recreation uses that need facilities built will often result in a rise in base floodplain elevation and require an alteration of the floodplain application. To better protect water quality, rather than modifying portions of the floodplain, those uses should not be allowed.
#4119	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	The can be considered when the FOD is revised. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#3987	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.E FLOODPLAIN OVERLAY DISTRICT. E. Permitted Uses. Has the definition for passive and active recreation uses been reviewed for further clarification?
#4082	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#3986	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02.D FLOODPLAIN OVERLAY DISTRICT. D. Administration. What is the County doing to address FEMA required floodplain studies to be able to adequately restart riparian buffer plantings to benefit protecting water quality?
#4081	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff	During ZOAM-2015-0003, FEMA clarified multiple times that by their definition of "Development" tree-planting was a man-made change that can have effects on

ID	Section
ryan.reed@loudoun.gov Date:9/14/2021	the base flood elevation. They further clarified that the studies, or declaration of no impact, could not be done within the county by qualified professionals.
#3985	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02 FLOODPLAIN OVERLAY DISTRICT. Should there be a River Stream Corridor Overlay District? This could also include elements to implement the Linear Parks and Trails Framework Plan.
#4080	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	River and Stream Corridor Resources (RSCR) is proposed in Development Standards, Section 5.03.01. Open for discussion whether implementing this plan policy should be an overlay district or standards.
#3984	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02 FLOOD PLAIN OVERLAY. E.1.i. Permitted Uses. Why is the text "temporary structure associated with Special Events" highlighted in red? An addition? To be deleted? To be discussed?
#4079	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	This is existing text. I am not sure why it is highlighted red, I do not see any changes in this section.
#3983	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	4.02 FLOOD PLAIN OVERLAY. How much of this entire section is being considered to move to the FSM? If it moves to the FSM, what are the communication issues with non-development professionals (e.g., farmers, rural businesses) that will need to be aware of the requirements before application and/or construction?
#4077	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	During ZOAM2015-0003, FEMA review required the FOD to encompass all of their requirements in a single section, and it could not be in the FSM as the requirements cannot be waived. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement. Communication,

ID	Section
	education and outreach are opportunities for the county to make sure citizens are aware.
#3982	5.03 Floodplain Overlay District
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	"4.02. FLOOD PLAIN OVERLAY. After many years in telecom, I'm a stickler for first reference of acronyms. Unless you enable hyperlinks for all (soon): D.2.f. Where is the first full reference of ""FEMA?"" d.2.i The first full reference for the acronym ""FIRM"" does not appear until D.3. Delineation of the FOD. Should have first reference of acronym at first appearance. E.1.a. Acronym ""CLOMR"" (Conditional Letter of Map Revision) is not defined at first reference."
#4075	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Full references added for each, but if and when the definitions are linked to the text, we will revisit to determine appropriateness.
#3961	5.03 Floodplain Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	FOD-E 2. Say if a golf course wants to modify a few greens for a national golf tournament, what is the approval process?
#4113	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	From the Floodplain Administrator: If the work is in the FOD, Major, a zoning permit and engineering analysis (either a statement/certification or floodplain alteration). FOD, Minor does not require a zoning permit, but does require the engineering analysis.
#3960	5.03 Floodplain Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	FOD-E 2.b How is "No Impact" proved? What rise in flood level? <.1 feet?
#4111	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	From the Floodplain Administrator: No Impact is proved with a statement of justification signed and sealed from a licensed professional. No rise is measured at 0.00 ft.

ID	Section
#3959	5.03 Floodplain Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	FOD-E permitted Uses 1. When these regulations were originally adopted, we were assured that farm fences and shelters for farm animals and horses would not be affected. It would help to make this clearer.
#4074	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#3958	5.03 Floodplain Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	FOD-E permitted Uses 1.i. Good to address temporary structures
#3957	5.03 Floodplain Overlay District
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/12/2021	FOD-E permitted Uses 1.d Utilities Apparently water and sewer mains are permitted in floodplain areas, but the much smaller service lines and laterals that extend to houses and businesses are not. This should be corrected.
#4073	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Staff has noted this and will include this in changes to contemplate when revising the FOD. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#3930	5.03 Floodplain Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/9/2021	This section is dense with acronyms, not all of which are explained. FIRM is, but only obliquely. CLOMR is not, so far as I can tell.
#3937	5.03 Floodplain Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com	OK, so I see the definitions below. Ignore this comment and others like it.

ID	Section
Date:9/9/2021	
#3935	5.03 Floodplain Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/9/2021	I.1.a. Residential Construction. Implies that residential construction is possible within the FOD, but such is not listed in the uses. Something is wrong. Construction other than that listed in the uses should not be allowed.
#4072	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Agreed. This was a portion of the ordinance that was required per FEMA during ZOAM-2015-0003. Again, substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#3934	5.03 Floodplain Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/9/2021	I did not see an explanation of what constitutes 'substantial improvement'
#3933	5.03 Floodplain Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/9/2021	H.3. seems to suggest that manufactured homes can be place in FOD, while such are not listed among the Uses. Clarify.
#4071	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Agreed. During ZOAM-2015-0003, FEMA required this section to be included despite the County's regulations. Substantial updates to the FOD are planned in a standalone effort after the ZO Rewrite to provide ample time for Federal Emergency Management Agency and Virginia Department of Conservation and Recreation review and additional community engagement.
#3932	5.03 Floodplain Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/9/2021	Should Overlay District Development Procedures be placed into the Procedures section of the ZO instead of here?
#4070	5.03 Floodplain Overlay District

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	With the exception of the FOD, yes.
#3931	5.03 Floodplain Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/9/2021	E.1.c.1. What is Rooftop disconnection?
#4069	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	A stormwater practice where the rainfall that is concentrated from the impervious roof surfaces is intercepted and filtered, treated, infiltrated, reused or otherwise routed to reduce velocity. Often combined with other BMPs.
#3929	5.03 Floodplain Overlay District
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/9/2021	How much of this section can be moved to the FSM-- Duties and Responsibilities of the Floodplain Administrator for instance? To that end, will there be hotlinks between the ZO and the FSM?
#4068	5.03 Floodplain Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Very few, as FEMA and DCR required the regulations to be in a single ordinance and not be able to be waived.
#6616	5.02 Airport Impact Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:12/15/2021	Re 4.01 C. I have heard that there is a proposal to eliminate the notice requirements for properties within 1 mile of the 60 ldn. DO NOT DELETE THIS NOTICE REQUIREMENT!
#3952	5.02 Airport Impact Overlay District
By: John Merrithew Tags: zoc Date:9/11/2021	D.3.b. Requires only the acoustical treatment of the VUSBC. To my previous question, what is the requirement and should this section require the more effective acoustical treatment (45 Dba or the VUSBC)?
#3953	5.02 Airport Impact Overlay District

ID	Section
By: John Merrithew Tags: zoc Date:9/11/2021	Correction the overlay requirement is 45 dbaLdn
#4054	5.02 Airport Impact Overlay District
By: Christopher Blough Tags: staff christopher.blough@loudoun.gov Date:9/13/2021	Staff can explore the revising the standard in D.3.b. to require the more effective treatment between the acoustical standards of the VUSBC and 45 Dba as part of the ongoing CPAM and ZOAM work for the AIOD.
#3951	5.02 Airport Impact Overlay District
By: John Merrithew Tags: zoc Date:9/11/2021	Can staff tell us if there is an acoustical limit for interior noise in the "standard" building code for residential uses? How does the overlay required limit compare to the treatment normally required in residential buildings?
#4239	5.02 Airport Impact Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	We will need to look into this further.
#3926	5.02 Airport Impact Overlay District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/9/2021	Good ideas but how would they be enforced?
#4067	5.02 Airport Impact Overlay District
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	These are largely enforced during the land development application process.
#10982	5.01 General Provisions of Overlay Districts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"4.01. OVERLAY DISTRICTS -- GENERAL PROVISIONS. There are general concerns about the exemption for 'agriculture' uses in the floodplain, mountainside and limestone districts. Given the broad definition used by the county for ""agriculture"" uses that are primarily tourist/agritourism/event venues, there is concern that the exemption may be used to open a use in an inappropriate location that, in operation, would be contrary to the regulations for these Overlay Districts. Staff Response: Staff continues to review exemptions with the County Attorney's Office and consider appropriate performance standards. 2022 Round 3 Input: The general request that applies to these

ID	Section
	<p>Overlay Districts is to identify and apply a more detailed exemption list AND/OR, identify Uses that are NOT permitted in certain Overlay Districts. There are too many loop holes for high-intensity operations that would harm the environment, nature, wildlife and quality of life for neighbors (these things include clear cutting, excavating I grading etc.) and thereby violate the intent of the Comprehensive Plan. Use the capabilities of enCodePlus to apply Use Exclusions for ARN/ARS districts by use of existing Overlay Districts."</p>
#10474	5.01 General Provisions of Overlay Districts
<p>By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/4/2022</p>	<p>4.01 D 2 I'm a little concerned that in the Historic Overlay and Village Conservation overlay districts, the intent is to provide some flexibility for lot and building standards and relying on the greater requirement or more speechifies provision removes that flexibility.</p>
#3981	Chapter 5: Overlay Districts
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021</p>	<p>"Section 4.2100. 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):" Section 4.2100. Consideration/discussion for which ZOR-defined uses should be EXCLUDED from Village Place Types until after Village Small Area Plans are finalized. A list of Uses to be excluded has been prepared and will be submitted separately. Section 4.2100. An overlay district for our historic villages is very important to maintain their identity and preservation 4.2101. Each village is unique so will benefit from each having Small Area Plan. Support from the county will be necessary to accomplish this. 4.2102. Need to add other villages: Morrisonville, Unison, Willisville. Delete Ashburn. Change Aldie Mt to Bowmantown. How would new ones be added in the future? 4.2103. 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: there are small lots in Waterford but larger ones in St Louis. also, RC zoning density will not work in all villages 4.2104.A2. Height of new building no greater than height of any building on same side of street within 150 yards 4.2104.A3. If current parcels on well and septic, water studies must be done to ensure availability of these resources after new development complete 4.2104.B1a. Extending existing streets good as long as cul de sac does not result 4.2104.B3a. Sidewalks allowed if appropriate in specific village....some villages have, some do not 4.2104.B5. Only detached garages should be permitted.</p>
#3980	Chapter 5: Overlay Districts

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	<p>"4.00. OVERLAY DISTRICTS -- GENERAL. The following list of terms have raised questions about the definitions and the ability to enforce them, or enforce stipulations they may trigger. Can the following terms be made less ambiguous? -- slight or limited, moderate, and severe environmental and public safety impacts (from MDOD section 4.03.C when defining different types of sensitive environmental areas - it's the definition of the category, which itself is not actually defined) -- ""good and sufficient cause"" (this was in regards to allowing a special exception in FOD section 4.02.K) -- ""exceptional hardship"" (this was also in regards to allowing a special exception in FOD section 4.02.K) -- inconsistency between a term that was used versus what was defined: ""Substantial damage"" is defined but not ""significant damage"""</p>
#4066	Chapter 5: Overlay Districts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/14/2021	Yes, we will be working to standardize language and define terms.
#3979	Chapter 5: Overlay Districts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/13/2021	<p>"4.00. OVERLAY DISTRICTS -- GENERAL. There are general concerns about the exemption for 'agriculture' uses in the floodplain, mountainside and limestone districts. Given the broad definition used by the county for ""agriculture"" uses that are primarily tourist/agritourism/event venues, there is concern that the exemption may be used to open a use in an inappropriate location that, in operation, would be contrary to the regulations for these Overlay Districts. The general request that applies to these Overlay Districts is to identify and apply a more detailed exemption list AND/OR, Uses that are NOT permitted in certain Overlay Districts. There are too many loop holes for high-intensity operations that would harm the environment, nature, wildlife and quality of life for neighbors (these things include clear cutting, excavating I grading etc.) and thereby violate the intent of the Comprehensive Plan. Will Overlay District Use restrictions be applied?"</p>
#4238	Chapter 5: Overlay Districts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/17/2021	Staff continues to review exemptions with the County Attorney's Office and consider appropriate performance standards.
#10907	4.08.06 Winery, Commercial
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.06.08.06.D.1 COMMERCIAL WINERY. SITE SIZE. 10 acre minimum is insufficient if the location hold Events or Special events. Staff Response: ""Noted"" 2022 Round 3 Input: It is INCONSISTENT to NOT have regulations for Events permitted by Right and Special Events also defined for Commercial Wineries similar to banquet/event facilities and B&B's. Such regulations should be scaled to the size of the operation as is done for other agricultural/agritourism</p>

ID	Section
	<p>businesses. For consistency, commercial winery regulations for acres and other standards should be in tiers or levels if the location hold large and/or ""special"" events. Regulations should include the same parameters as originally proposed (then deleted by the former DPZ Director) as Limited Breweries for Events or Special Events that are CONSISTENT with regulations implemented by near and adjacent counties. If Events/Special Events are allowed, then 20 acre minimum is more consistent with other similar intensity uses."</p>
#10906	4.08.06 Winery, Commercial
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.06 WINERY, COMMERCIAL. Commercial wineries should not be permitted in MDODs. Staff Response: ""Noted"" 2022 Round 3 Input: IF allowed in the MDODs, they must meet all the permit application, set back, buffering, lighting, Special Event regulations, and etc requirements as originally proposed (then deleted from draft text) for Brewery, Limited, for all of the same reasons. [Consider in advance of Overlay District discussion.]"</p>
#10866	4.08.06 Winery, Commercial
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>VIRGINIA FARM WINERY - NEW SECTION REQUEST "3.05.08.06 VIRGINIA FARM WINERY -- USE-SPECIFIC STANDARDS Required. Although this Use did not have Performance Standards outlined in the current zoning ordinance when added as a use circa 2005, based on information over 15+ years shows omission of use specific standards in the new Zoning Ordinance Rewrite is INCONSISTENT to protect the health, safety and welfare of the public. Originally, farm wineries were just tasting rooms for their product. Since ~2015 several have become event locations promoting weddings and concerts. Therefore, similar to other operations, regulations at a minimum should include: Intensity/character, Site size, Location, Size of use, Events by right, Special Events, Location dimension standards, Landscaping/buffering/screening, Parking, Road access, Lighting and Noise that are comparable to other uses of similar scale and intensity. Additional evidence of the need for use-specific standards can be sent upon request to James David and/or ZORewrite@loudoun.gov. Staff Response: Noted. Staff will consider additional use-specific standards. 2022 Round 3 Input: Basic use-specific standards with three or four "Levels" or "tiers" for various size operations in line with other rural uses should be established for farm wineries. This would accommodate small to large operations while managing impacts. 1) The basic concept behind ""levels"" or ""tiers"" has been raised and discussed at REDC ZOR Adhoc and ZOC. Some level of regulations are needed to address the issues encountered over the past 5-10 years due to the absence of regulations. 2) County Staff and Zoning Enforcement have agreed that the absence of regulations on the front end provide no approval or denial criteria during permit review, resulting in the inability to ensure proper location for a use required to be ""on a farm in the Commonwealth on land zoned agricultural."" 3) The Code of VA provision enables the ONLY permit approval criteria being in AR-1 or AR-2 agricultural zoned land, not on a ""farm."" The definition of ""farm"" would enable criteria to include proper location evaluation within AR-1/AR-2, not the entire district as a whole. 4) the absence of regulations also provides no means or mechanism for Zoning Enforcement to evaluate and enforce basic protections in line with other ag uses. Without a written regulation providing the benchmark criteria (i.e.,</p>

ID	Section
	<p>levels, tiers, setbacks, parking, lighting, noise, buffering, etc.) Zoning Enforcement has nothing it can enforce to confirm or cancel a complaint.</p> <p>5) OTHER VIRGINIA COUNTIES have implemented some additional regulations for events at farm wineries -- including but not limited to Albemarle, Clarke, Warren, Fauquier, Goochland, Prince William, Greene -- have applied zoning regulations for Farm Wineries and Distilleries in addition to Limited Breweries. See Virginia Counties Comparison Matrix https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-Virginia-Counties-Ordinance-Comparison.pdf"</p>
#9870	4.08.06 Winery, Commercial
<p>By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022</p>	<p>Farm wineries are covered at length in the definitions, but shouldn't there be standards here?</p>
#9869	4.08.06 Winery, Commercial
<p>By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022</p>	<p>There should be a requirement that 30% of ingredients (i.e., grapes) must come from the property.</p>
#3861	4.08.06 Winery, Commercial
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>"3.06.08.07 VIRGINIA FARM WINERY -- USE STANDARDS Required Although this Use did not have Performance Standards outlined in the current zoning ordinance when added as a use circa 2005, based on information over 15+ years shows omission of use specific standards in the new Zoning Ordinance Rewrite is INCONSISTENT to protect the health, safety and welfare of the public. Originally, farm wineries were just tasting rooms for their product. Since ~2015 several have become event locations promoting weddings and concerts. Therefore, similar to other operations, regulations at a minimum should include: Intensity/character, Site size, Location, Size of use, Events by right, Special Events, Location dimension standards, Landscaping/buffering/screening, Parking, Road access, Lighting and Noise that are comparable to other uses of similar scale and intensity. Additional evidence of the need for use-specific standards can be sent upon request to James David and/or ZORewrite@loudoun.gov. OTHER VIRGINIA COUNTIES -- including but not limited to Albemarle, Clarke, Warren, Fauquier, Goochland, Prince William, Greene -- have applied zoning regulations for Farm Wineries and Distilleries in addition to Limited Breweries. See Virginia Counties Comparison Matrix https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-Virginia-Counties-Ordinance-Comparison.pdf"</p>
#4751	4.08.06 Winery, Commercial
<p>By: Ryan Reed</p>	<p>Noted. Staff will consider additional use-specific standards.</p>

ID	Section
Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	
#3860	4.08.06 Winery, Commercial
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.06 WINERY, COMMERCIAL. Will Section 3.06.01.B address lighting standards for seasonal lighting displays, and dark sky compliance or are separate standards required in Uses?
#4752	4.08.06 Winery, Commercial
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	The use will be subject to Section 5.12 - Exterior Lighting and Noise Standards.
#3859	4.08.06 Winery, Commercial
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.06 COMMERCIAL WINERY and VIRGINIA FARM WINERY. PROPOSED LEGISLATIVE ACTION REQUEST. These should have the same requirements for public notice as Brewery, Limited, and is supported by State Code 4.1-230. Will public notice requirements be considered?
#4753	4.08.06 Winery, Commercial
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted. staff will consider public notice requirements.
#3858	4.08.06 Winery, Commercial
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.06 WINERY, COMMERCIAL BRMCA indicates Commercial wineries should not be permitted in MDODs. IF allowed in the MDODs, they must meet all the permit application, set back, buffering, lighting, Special Event regulations, and etc requirements of the Brewery, Limited, for all of the same reasons. [Consider in advance of Overlay District discussion.]
#3857	4.08.06 Winery, Commercial
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com	"3.06.08.06. WINERY, COMMERCIAL. It is INCONSISTENT to NOT have regulations for Events permitted by Right and Special Events also defined for Commercial Wineries. Such regulations should be scaled to the size of the operation as is done for other agricultural/agritourism businesses. Can language

ID	Section
Date:9/6/2021	be applied to cover these issues in detail prior to closing the review on this section? Confirm that new Section 3.06.01.B applies?"
#4756	4.08.06 Winery, Commercial
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	Section 3.06.01.B applies.
#3856	4.08.06 Winery, Commercial
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.06.D.1 COMMERCIAL WINERY. SITE SIZE. 10 acre minimum is insufficient if the location hold Events or Special events. Can regulations include the same parameters as Limited Breweries if Events or Special Events? If Events/Special Events are allowed, then 20 acre minimum is more consistent with other similar intensity uses.
#4757	4.08.06 Winery, Commercial
#3549	4.08.06 Winery, Commercial
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:8/29/2021	Can we require a level of onsite produce? I assume winery is the ag operation. Don't think we should regulate the storage area of a winery. Half the buildings can be for drinking wine and sales? seem high.
#3561	4.08.06 Winery, Commercial
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	We are reviewing onsite-production standards and are open to feedback regarding what would be appropriate. We can reevaluate the regulation and amount of buildings / floor area.
#3070	4.08.06 Winery, Commercial
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Suggest no commercial wineries in the MDOD
#3069	4.08.06 Winery, Commercial
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Require that these be located on the larger paved roads, however they roads are classified.

ID	Section
#3564	4.08.06 Winery, Commercial
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	noted. we are reviewing the road classifications currently.
#3068	4.08.06 Winery, Commercial
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Where is "farm winery"?
#3563	4.08.06 Winery, Commercial
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	Virginia Farm Winery did not have use-specific standards in the existing ZO and therefore it was not carried over.
#10973	4.08.05 Wayside Stands
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.06 COMMERCIAL WINERY and VIRGINIA FARM WINERY. PROPOSED LEGISLATIVE ACTION REQUEST. These should have the same requirements for public notice as Brewery, Limited, and is supported by State Code 4.1-230. Will public notice requirements be considered? Staff Response: Noted. staff will consider public notice requirement" STATUS?
#10972	4.08.05 Wayside Stands
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.05 Wayside stands. 2022 Round 3 Input: What percent of products can be sold that are not made on-site? This should be defined."
#10971	4.08.05 Wayside Stands
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.05.C. WAYSIDE STANDS. BRMCA indicates, if allowed in the MDODs, a site plan for ingress/egress, emergency access, driveways, and parking must be submitted to XXX, and requires review by Emergency Services, Traffic Division, VDOT. Wayside stands should be operated during full daylight hours only, thus no lighting is allowed. [Consider in advance of Overlay District discussion.] Staff Response: ""Noted"""

ID	Section
#9868	4.08.05 Wayside Stands
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Wayside stands should not be more than 400 sf of structure. (10,000 sf is a building, not a stand.)
#6291	4.08.05 Wayside Stands
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/30/2021	What % of products can be sold that are not made on-site?
#3855	4.08.05 Wayside Stands
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.05.C. WAYSIDE STANDS. BRMCA indicates, if allowed in the MDODs, a site plan for ingress/egress, emergency access, driveways, and parking must be submitted to XXX, and requires review by Emergency Services, Traffic Division, VDOT. Wayside stands should be operated during full daylight hours only, thus no lighting is allowed. [Consider in advance of Overlay District discussion.]
#3749	4.08.05 Wayside Stands
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	There is a long-standing wayside stand at the intersection of Route 9 and Clarkes Gap Road, sited in the parking lot of the Shell station. Nothing is grown on-site, but a large portion of the sales are of fruits and vegetables grown on farms nearby. We should not forbid this type of outlet.
#4750	4.08.05 Wayside Stands
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted. Would that example be a Farm Market - Offsite Production?
#3404	4.08.05 Wayside Stands
By: John Merrithew Tags: zoc Jm@loudoun.gov Date:8/25/2021	F is confusing
#3565	4.08.05 Wayside Stands
By: Ryan Reed	Edited in attempt to clarify.

ID	Section
Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	
#3067	4.08.05 Wayside Stands
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Suggest size limit of 1,000 sf. Suggest allowing 50% of products to be from 3rd party sources. These are not "farm markets," but simple stands and should be encouraged. Suggest signage and lighting standards.
#3566	4.08.05 Wayside Stands
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	Open to discussion. We want to encourage / require on-site production and Loudoun-grown. They will be subject to sign and lighting standards, are there additional considerations that should be required for these?
#2985	4.08.05 Wayside Stands
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	What distinguishes a Wayside Stand from a Farm Market?
#3567	4.08.05 Wayside Stands
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	A wayside stand is a secondary use to an agricultural operation, and provides sales of products produced on-site. A farm market is a principle use, and includes farm market off-site production, which does not limit the source of products and allows for additional vendors.
#13575	4.08.04 Brewery, Limited
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:7/18/2022	Farm Bureau 3.05.08.04. B Where are the hours of operation? See 305.08.06 D.3. Hours of operation. Why are wineries limited from 10am to 10pm but limited breweries are not? Loudoun should not be holding our large successful agricultural sectors to a standard more stringent to a non agricultural sector.
#13573	4.08.04 Brewery, Limited
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:7/18/2022	Farm Bureau 3.05.08.04. B While many of these are located on land zoned agricultural they are most often not on farms. Many of them have no active agriculture present on site. The county must mandate and enforce a percentage of acreage to be in active, meaningful agricultural use. A definition of Farm must be established for the ZOR including onsite growing requirements.

ID	Section
#12952	4.08.04 Brewery, Limited
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	3.05.08.04 and 3.05.08.06 and all uses with similar offsite impacts including event centers, etc should have common use-specific standards for the site and business operation including but not limited to setbacks, buffering, parking, noise, lighting, hours of operation, public safety, access and impacts on quality of life for neighboring properties.
#12950	4.08.04 Brewery, Limited
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	3.05.08.04 and 3.05.08.06 As agricultural uses, production agriculture should be required and parcels greater than 5 acres should be required to go into a conservation easement to support continued agricultural use of the land should the uses cease to exist in the future.
#10970	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.04.A.3 BREWERY, LIMITED. With the known issues documented in LEx and case studies over the past seven years, related to well/septic non-compliance, Health Dept. permit violations, lack of capacity for size of facility and events this Use Staff must consider requiring a ""site plan"" instead of ""sketch plan"" for the health, safety and welfare of the public Staff Response: ""Noted"""
#10969	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.04.A.2 BREWERY, LIMITED. APPLICABILITY. State Code 4.1-206.1 Manufacturer license, Effective July 1, 2021 speaks to Limited Distillers licenses, limited brewery licenses, winery licenses, farm winery licenses, and Beer importer licenses. How will/are Limited Breweries, and others now included, in operation BEFORE this date be governed now? and when the new code is implemented? Staff Response: Staff cannot speak to the implementation and enforcement of state code without further review from the County Attorneys Office" STATUS?
#10968	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.04.A.2 BREWERY, LIMITED. APPLICABILITY. State Code 4.1-206.1 Paragraph 4 states that limited Brewery licenses will be given to breweries "that manufacture no more than 15,000 barrels of beer per calendar year" but does not set a minimum amount of manufacture. Could a "brewery" produce one barrel of beer per year, source product from other brew manufacturers and function primarily as an Event/Music center? Fairfax County had Code of VA modified to add "Except for the limitation on land zoned "residential conservation," nothing in this definition shall otherwise limit or affect local zoning authority. Does this give Loudoun County a similar authority to set requirements for Limited Breweries in ARS and ARN and MDOD lands? Staff Response: Staff will further research"

ID	Section
#10905	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04. BREWERY, LIMITED. MISSING REGULATIONS. County internal process for all VaABC opinion letters should require proactive response and request for status to Planning & Zoning. [Documenting request in Uses in advance of Procedures discussion] -- A response is required from County Attorney is required to indicate contact and status from Zoning (use permitted on parcel/location), Building & Development (if application indicates Ag Structure) and Health Department (if application indicates "tasting room," events or includes bathroom, kitchen requiring septic). -- County should be required to inform VaABC when applicant is in known violation of Code of Va § 4.1-225-2.a. The place occupied by the licensee: a. Does not conform to the requirements of the governing body of the county, city or town in which such establishment is located, with respect to sanitation, health, construction or equipment, or to any similar requirements established by the laws of the Commonwealth or by Board regulations. -- VaABC should be notified of County objection within the 30 day time limit if Zoning, B&D, HD issues or non-compliance are determined. -- No Waivers should be granted for non-compliance with State requirements (e.g., use of local well as water source prior to or without ODW certification of non-transient community waterworks). RECOMMENDATIONS: State Legislative -- VaABC application Posting and Publishing notice requirements are insufficient. Request State changes to VaABC application and process to require 1) written notification to adjacent property owners; 2) Publishing in local paper with known distribution to adjacent property owners (i.e., not publications known not to be available or delivered to adjacent property owners); 3) Posting requirements should be required on posts/stakes at two locations on the edge of the applicant property, clearly visible to all adjacent property owners (not "front door"). Staff Response: While the county reviews VAABC opinion letters, as an informed entity, the county currently does not provide proactive enforcement. Implementation of VAABC laws is beyond the scope of the ZO 2022 Round 3 Input: Regulations to review ALL VaABC license requests should be made part of Chapter 7 procedures to ensure consistent and proper evaluation in conjunction with zoning permit requests."</p>
#10904	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04. BREWERY, LIMITED. MISSING REGULATIONS. As indicated in 2017-2018 case studies and review of other county ordinances, Loudoun County CAN add regulations for the health, safety and welfare of the public. VIRGINIA COUNTIES COMPARISON REPORT* summarizes regulations other counties have approved and implemented for: 1) Minimum crop acre production, 2) Maximum attendees for Events and Special Events 3) Yard standards for front yard, side yard, rear yard. 4) Landscaping/buffering/screening, 5) Road Access and heavy equipment, 6) Exterior lighting, including Dark Sky requirements for lighting on ridge lines/slopes in MDOD (seasonal or otherwise). 7) NOISE. 8) Hours of Operation *VIRGINIA COUNTIES COMPARISON REPORT - 2021 UPDATE https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-Virginia-Counties-Ordinance-Comparison.pdf Staff Response: ""Noted"" 2022 ROUND 3 INPUT: Other Virginia counties have established the above basic regulations. For zoning ordinance consistency, all high-intensity uses should be required to have basic</p>

ID	Section
	regulations for acres, hours of operation, yard standards, setback, buffering, road access and event. "
#10903	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04. BREWERY, LIMITED. MISSING REGULATIONS. County Zoning permits and approvals have been provided in advance of approval of Virginia Health Department, Virginia Office of Drinking Water (ODW), and Virginia Department of Agricultural Consumer Services (VDACS). RECOMMENDATIONS: -- All required water, sewer and environmental actions required by the Commonwealth of Virginia for the facility must be completed prior to the facility being approved for operation by the County. -- Conditional approval while waiting for completion of actions is not recommended, as in numerous cases State requirements were not completed until after complaints and notices of violation. 2022 Round 3 Input: Regulations to review ALL VaABC license requests should be made part of Chapter 5 Development and Chapter 7 procedures to ensure consistent and proper evaluation in conjunction with zoning permit requests."</p>
#10902	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04.G BREWERY, LIMITED. APPLICATION REQUIREMENTS. BRMCA Suggest that a site plan, including a professional survey of the property boundaries, plats of adjacent or across-the-street lots and their existing uses (residence, school, church, etc), and any existing wells, septic fields, structures, and distances from property lines; placement and plans for any new structures, wells, septic fields, outdoor seating, outdoor lighting, driveways, access points Staff Response: ""Noted"" 2022 Round 3 Input: To be CONSISTENT with other similar high-intensity uses, multiple levels or tiers should be established based on the acreage, quantity and planned zoning uses. Higher levels should require a site plan instead of a sketch plan to address the additional zoning requirements for larger, high-intensity operations."</p>
#10901	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04.G BREWERY, LIMITED. Sketch Plan / Application Requirements. Statement indicates this section has been moved to a new heading, Application Requirements. Unless this relocated section for Sketch Plan includes the specific references required for Limited Breweries (i.e., tasting, storage, outdoor areas, 300' requirements from property line, etc.) then this section should REMAIN in Section 3.06.08.04.G to ensure all requirements are known and not omitted. Otherwise, a Site Plan should be required. Staff Response: ""Noted"" 2022 Round 3 Input: It is important to set a greater minimum distance from the Limited Brewery property line, as experience has shown that amplified entertainment and voices carry long distances, well beyond 300 feet. A sketch plan or site plan should be denied approval if insufficient information is provided on an application indicating actual zoning use A zoning permit should be revoked if the Use after approval greatly exceeds the standards applied for after opening, based on inspection and volume of issues verified"</p>

ID	Section
#10900	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.04.F BREWERY, LIMITED. Prohibited Uses. These are in line with other countys. 2022 Round 3 Input: 2022 Round 3 Input: REINSTATE the text addressing Events at high-intensity uses, reviewed by ZOC Sept. 2021 and removed wihtout notice by the former Director of Planning & Zoning. https://loudouncoalition.org/wp-content/uploads/2022/06/2021_09-15-Draft-Text-Deletions.pdf Can additional prohibited accessory uses be added to include: Hot Air Balloon Rides; Carnival Inspired Games, (thinking shooting at targets for prizes), live auctions, and any use of firearms?"
#10899	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.04. BREWERY, LIMITED. E. Special Event. Review of current weekly newspaper and social media posts show the primary promotion is for current music performers and/or food trucks, not the agricultural product. Some are requiring ticket entrance. How does this make this use in compliance with Code of VA versus being an event venue? Staff Response: ""Noted"" 2022 Round 3 Input: REINSTATE the text addressing Events at high-intensity uses, reviewed by ZOC Sept. 2021 and removed wihtout notice by the former Director of Planning & Zoning. https://loudouncoalition.org/wp-content/uploads/2022/06/2021_09-15-Draft-Text-Deletions.pdf "
#10898	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.04. BREWERY, LIMITED. E. Special Event. Use of portable facilities should be only allowed during the specific timing of a special event, not permanent sanitary facilities, circumventing Health Department requirements for adequate septic. Staff Response: ""Noted"" 2022 Round 3 Input: REINSTATE the text addressing Events at high-intensity uses, reviewed by ZOC Sept. 2021 and removed wihtout notice by the former Director of Planning & Zoning. https://loudouncoalition.org/wp-content/uploads/2022/06/2021_09-15-Draft-Text-Deletions.pdf "
#10897	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.04. BREWERY, LIMITED. E. Special Event. What is the intent (or justification) for the condition that ""subsequent special event shall be at least 2,000 feet from the location of the previous event""? A ""one size fits all"" approach of ""250 persons in attendance"" is inconsistent with other Agricultural operations that SCALE the quantity of patrons based on quantity of acres and/or size of structure. Staff Response: ""Noted"" 2022 Round 3 Input: REINSTATE the text addressing Events at high-intensity uses, reviewed by ZOC Sept. 2021 and removed wihtout notice by the former Director of Planning & Zoning. https://loudouncoalition.org/wp-content/uploads/2022/06/2021_09-15-Draft-Text-Deletions.pdf "

ID	Section
#10896	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 7/9/2022	"3.06.08.04.D.2 & E.2 BREWERY, LIMITED. EVENT & SPECIAL EVENT PARKING. D.2. Events state all parking MUST be provided on site, whereas E.2. Special Events state all parking SHOULD be provided on site out of the public right-of-way. These requirements should be made consistent. Staff Response: ""Noted"" 2022 Round 3 Input: REINSTATE the text addressing Events at high-intensity uses, reviewed by ZOC Sept. 2021 and removed without notice by the former Director of Planning & Zoning. https://loudouncoalition.org/wp-content/uploads/2022/06/2021_09-15-Draft-Text-Deletions.pdf "
#10895	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 7/9/2022	"3.06.08.04. BREWERY, LIMITED. D. Limited Brewery Events & Special Events. Would the addition of the ""or similar activities"" would encompass ""Trivia Night""? If so, how would the included description for events evaluate the advertising of food truck and/or musicians in newspaper and social media postings on a weekly basis? What is the definition of ""planned?"" There is no business marketing difference for these activities, evidenced by newspaper postings. This indicate that 250 patrons any night/week would be permitted, regardless of the size of the parcel, facility or operation. This is INCONSISTENT with other Agricultural operations that Scale the quantity of patrons based on quantity of acres and/or size of structure. OTHER COUNTIES have addressed this in various ways: https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-Virginia-Counties-Ordinance-Comparison.pdf ALBEMARLE COUNTY: Events (by-right) are permitted for Events, weddings, receptions etc. eligibility: Minimum 5 acres crops of fruits grains or other ag products planted on-site or adj. same owner in production (fermentation/bottling processes and on-site tasting room. BY RIGHT: not more than 200 in attendance at any time, subject to the following: ZONING CLEARANCE req'd if: Less than 21ac in size OR generates >50 vehicle trips/day, and <200 persons NOTICE: Written notice to adjacent lots for 1 or more events. Special Events: No kitchen service allowed for Special Events, portable toilets screened WARREN COUNTY: Usual and customary activities* for less than 100 persons in attendance at any organized event. Conditional use permit required for more than 100 persons. GOOCHLAND COUNTY: Weddings, receptions, reunions or similar on 50 acres or more must have: onsite fermentation; onsite tasting rm; minimum five (5) acres to agricultural products used in production of establishment's beverages. Max attendance calculated = (Parking x 4) - LESS occupancy of tasting room. Limit one event per week. Hours: End by 11pm Fri/Sat, by 10pm Sun thru Thurs. Event areas need 200' setback from all adj properties. Lighting must be dark sky compliant Special Event cannot occur more than eight (8) times per year PRINCE WILLIAM COUNTY: More than 150 people require temporary activity permit (Special event) CLARKE COUNTY: Classifies Special Event as a) Any assembly, attraction, ceremony, event, festival, gathering, circus, carnival, or show at which rides, games, competitions, attractions, music, dance, or other performing arts are engaged in by participants or provided as entertainment by professional or amateur performers or by prerecorded means, 1) Which involves the raising, charging, donating or re-couping of funds, 2) Which is held at any place other than on property owned by [Gov], or (2) In a permanent enclosed structure; 3) To which the public is invited or admitted;. . . and 5) Which occurs

ID	Section
	<p>on a parcel of land of six or more acres (a parcel of land of six or more acres may include adjoining parcels with the same owner that have a total area of six or more acres). Event Hours: not permitted btw 12:00am to 7am Ticket admission to insure permit not exceeded Staff Response: ""Noted"" 2022 Round 3 Input: REINSTATE the text addressing Events at high-intensity uses, reviewed by ZOC Sept. 2021 and removed without notice by the former Director of Planning & Zoning. https://loudouncoalition.org/wp-content/uploads/2022/06/2021_09-15-Draft-Text-Deletions.pdf</p>
#10894	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04. BREWERY, LIMITED. C. Intensity/Character. Parking ratios in the Use Table Matrix for Limited Breweries is ""1/1000 sf"". There is no clarification whether square feet applies to the Brewery structure or the Brewery overall VaABC licensed area. Staff Response: ""Noted"" 2022 Round 3 Input: If not applied to licensed area, ratios will not address the (at times overflowing) parking situations in current Limited Brewery locations that have overflow parking, street parking where not permitted or safe, and parking on adjacent property front yards. A recommendation was made at the ZOC meeting in July for ZOR Staff to further review ACTUAL Limited Brewery parking to determine how to mitigate the safety, health, and welfare issues currently and when the new ordinance is applied. If Staff is unable to obtain a full and complete list of such cases and complaints via LEx, copies and photos can be sent to ZORewrite@loudoun.gov."</p>
#10893	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04.C BREWERY, LIMITED. LECA Input -- C. Intensity/Character. Warren County applies the following hours of operation: Microbrewery (Limited Brewery) & Distillery : 9am to 5pm, Brewpub: 9am to 9pm, Winery: 9am to 10pm Staff Response: ""Noted"" 2022 Round 3 Input: HOURS OF OPERATION should added to be CONSISTENT with other uses of similar scale and intensity. Commercial Winery is 10am to 10pm. Submitted Recommendations for Hours of Operation. Weekdays: Monday through Thursday: 10:00 a.m until 9:00 p.m. Weekends Friday through Saturday: 10:00 a.m. until 11:00 p.m. Sunday & Holidays: 10:00 a.m. until 5:00 p.m. P.S. Loudoun County can restrict wine/beer sales between 12pm Saturday through 6am Monday. https://law.lis.virginia.gov/vacode/title4.1/chapter1/section4.1-129/ "</p>
#10892	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04. BREWERY, LIMITED. C. Intensity/Character. 1. 50 feet set back from all lot lines for ""outdoor tasting rooms or similar outdoor activities"" adjacent to residentially zoned property is inadequate and inconsistent for uses of similar scale and intensity. Numerous cases of disturbance of patrons, children and dogs roaming and trespassing property is a disturbance of peace and quietude, safety, and property rights for adjacent residents. Staff Response: Noted. staff will further consider adequate setbacks 2022 Round 3 Input: Setbacks should be CONSISTENT for similar intensity uses. Outdoor tasting</p>

ID	Section
	rooms should be consistent with 10 ac commercial winery of 125ft setback, not 50ft. Consider regulations currently approved/used in other Counties: Albemarle County: Structures -- Fr-75'; Side 25'; Rr: 35' Parking: Fr: 75'; Side: 125'; Rr: 125' Fauquier County: Structures 300' from all lot lines"
#10891	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.04 B. BREWERY, LIMITED. Add ""A Limited Brewery is not allowed in the MDOD."" [Consider in advance of Overlay District discussion.] Staff Response: Much of the properties the MDOD overlays are ""Agricultural/ Residential"" districts. State code does not allow prohibiting the use in agricultural zoned areas 2022 Round 3 Input: Higher intensity/scale uses or operations with multiple uses should receive special exception review in MDOD zoned land or else not be permitted."
#10890	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.04. BREWERY, LIMITED. B. Location. The definition of ""farm"" for this use is inadequate to define and enforce the proper siting of an agricultural use as intended by Section 3.2-300 of Code of VA. Specifically, that section refers to ""BONA FIDE"" (which translates to and is used in law to describe ""good faith"") ""agricultural operation"" or ""production of agriculture."" Numerous case studies, current operations and complaints have identified locations permitted as a ""Brewery, Limited"" that do not comply with the intent or ""bona fide"" production requirements and have no agricultural/production agriculture operation. As in other counties, Staff must add the regulation to stipulate 5 acres of active agricultural crops/production to be CONSISTENT with current LAND USE TAXATION requirements § 3.2-300. Definitions. -- ""Agricultural operation"" means any operation devoted to the bona fide production of crops, or animals, or fowl including the production of fruits and vegetables of all kinds; meat, dairy, and poultry products; nuts, tobacco, nursery, and floral products; and the production and harvest of products from silviculture activity. -- ""Production agriculture and silviculture"" means the bona fide production or harvesting of agricultural or silvicultural products but shall not include the processing of agricultural or silvicultural products or the above ground application or storage of sewage sludge. Staff Response: Staff are considering the defined terms and appropriate scale of agricultural operations 2022 Round 3 Input: In addition to defining ""farm"" the terms ""agricultural operation"" and ""production agriculture"" must also be included in the list of definitions, consistent with the Code of Virginia."
#10889	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.04. BREWERY, LIMITED. B. Location. The definition of ""farm"" for this use is inadequate to define and enforce the proper siting of an agricultural use as intended by Section 3.2-300 of Code of VA. Specifically, that section refers to ""BONA FIDE"" (which translates to and is used in law to describe ""good faith"") ""agricultural operation"" or ""production of agriculture."" Numerous case studies, current operations and complaints have identified locations permitted as a

ID	Section
	<p>""Brewery, Limited"" that do not comply with the intent or ""bona fide"" production requirements and have no agricultural/production agriculture operation. As in other counties, Staff must add the regulation to stipulate 5 acres of active agricultural crops/production to be CONSISTENT with current LAND USE TAXATION requirements § 3.2-300. Definitions. -- ""Agricultural operation"" means any operation devoted to the bona fide production of crops, or animals, or fowl including the production of fruits and vegetables of all kinds; meat, dairy, and poultry products; nuts, tobacco, nursery, and floral products; and the production and harvest of products from silviculture activity. -- ""Production agriculture and silviculture"" means the bona fide production or harvesting of agricultural or silvicultural products but shall not include the processing of agricultural or silvicultural products or the above ground application or storage of sewage sludge. Staff Response: Staff are considering the defined terms and appropriate scale of agricultural operations 2022 Round 3 Input: In addition to defining ""farm"" the terms ""agricultural operation"" and ""production agriculture"" must also be included in the list of definitions, consistent with the Code of Virginia."</p>
#10888	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04.A.4 BREWERY, LIMITED. Will Staff consider requiring a ""site plan"" for sites to be reviewed by Fire, Rescue & Emergency Management, Traffic Division/VDOT, Health Dept, and Planning & Development, as each may have responsibility over components, such as vehicular access and lines of sight, First Responder access, septic, water, and impact on adjacent lots for the health, safety and welfare of residents and patrons? Staff Response: ""Noted"""</p>
#10887	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04. BREWERY, LIMITED. A.4. Applicability. Although pleased to see the change from ""requested"" to ""must"" contact Fire/Rescue and Dept. of B&D, the requirement for only an ""informational inspection"" is insufficient to ensure the health, safety and welfare of owners and patrons. Specifically, what happens when an ""informal"" inspection identifies violations? What documentation/record of the inspection is retained? What requirement does the owner have to repair/comply with safety ordinances? What enforcement/recourse is there if the owner fails to make repairs and/or comply? As noted in numerous case studies and written complaints, facilities used have not had electrical, plumbing or fire code inspections. https://loudouncoalition.org/2020/04/rural-uses/ Staff Response: ""Noted"""</p>
#10886	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04. BREWERY, LIMITED. MISSING REGULATIONS. VaABC license regulations permit ""licensed areas"" to serve, that includes both indoor and outdoor square feet. Calculation for parking requirements, traffic trips, event patrons should be based on the full (indoor and outdoor) square footage. It is inconsistent to not have the same type of health, safety and welfare regulations.</p>

ID	Section
	2022 Round 3 Input: Attendance. Capacity for parking should be considered for outdoor (licensed) space and vehicular traffic to comply with Road access standards (5.09.01) A site visit should be required for all new establishments."
#10885	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.06.08.04. BREWERY, LIMITED. MISSING REGULATIONS. 2022 Round 3 Input: Noise & Lighting –5.08.01.C. states, "Agricultural Operations. The standards contained in this Chapter do not apply to any lawful agricultural operation." Include a definition of "Agricultural Operations" in Chapter 11. This exception should not apply to the tasting room/tap room or other retail operations. Definition of ""Agricultural Operations"" should be CONSISTENT with description in Ch 4, MDOD 4.04: ""Agricultural Operations. Agricultural, horticultural, or animal husbandry operations located in the MDOD that are covered by, and conducted in conformance with, a Conservation Farm Plan, that includes best management practices, approved by the Loudoun County Soil and Water Conservation District or the U.S. Natural Resources and Conservation Service, and a Nutrient Management Plan approved by the Loudoun County Soil and Water Conservation District. Structures associated with agricultural operations are subject to all regulations in Section 4.04."" Only the bona fide agricultural operation portion of the business and property should be included in 5.08.01.C. as an exception to noise and lighting standards. In addition, the noise ordinance needs to be better defined for business uses in the rural area such as how loud the noise, where it is measured, by whom and when. This should also include better education for the public as well as opportunities for businesses to reduce unwarranted or nuisance complaints"</p>
#10867	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>DEFINITIONS 11.3 – NEW "11.03. DEFINITION OF ""FARM."" Staff proposed text, ""Farm: An agricultural use of one or more parcels of land, whether abutting or not, having a minimum of 5 acres and operated under the same ownership or stewardship, used for the production, cultivation, growing, harvesting or processing of agricultural or horticultural products or for animal husbandry purposes. Also reference "Agriculture, Bona Fide." 2022 Round 3 Input: The proposed definition does not clearly state the requirement for production on the 5 acres. Need to make sure ""processing"" in and of itself doesn't make a property a ""farm."" A farm can ""process,"" but that singular action in the definition does not define a ""farm."" Example: A business only processing ingredients not grown on the parcel to process a beverage (e.g., wine, beer, spirits) is not a ""farm."" 2022 Round 3 Input: ""processing of agriculture"" could lead to an existing high-intensity use being allowed on 5 acres instead of 10 acres. The definition of a farm is inadequate unless and until it includes some measure of intensity of use. It is not adequate to say 5 acres is a farm because crops are raised on the 5 acres. The definition must say how much of the 5 acres is used to grow crops. 2022 Round 3 Input: Because agricultural processing is a separate use, there is no need to include ""processing"" in the definition of farm. Delete processing from the definition. That way processing could be permitted on a farm, but solely processing wouldn't MAKE a property farm. 2022 Round 3 Input: ""One or more parcels of land, abutting or not with a minimum of 5 acres"" could create a loophole where a high intensity use could purchase small acreage</p>

ID	Section
	conceivably distant from the high intensity use and place all ag on that small parcel while maximizing the high intensity use on all other nonabutting parcels"
#10865	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>"3.05.08.04. BREWERY, LIMITED. MISSING REGULATIONS. As indicated in 2017-2018 case studies and review of other county ordinances, Loudoun County CAN add regulations for the health, safety and welfare of the public. VIRGINIA COUNTIES COMPARISON REPORT* summarizes regulations other counties have approved and implemented for: 1) Minimum crop acre production, 2) Maximum attendees for Events and Special Events, 3) Yard standards for front yard, side yard, rear yard, 4) Landscaping, buffering, screening, 5) Road Access and heavy equipment, 6) Exterior lighting, including Dark Sky requirements for lighting on ridge lines/slopes in MDOD (seasonal or otherwise), 7) Noise, 8) Hours of Operation *VIRGINIA COUNTIES COMPARISON REPORT - 2021 UPDATE https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-Virginia-Counties-Ordinance-Comparison.pdf</p> <p>Staff Response: ""Noted"" 2022 ROUND 3 INPUT: Other Virginia counties have established the above basic regulations. For zoning ordinance consistency, all high-intensity uses should be required to have basic regulations for acres, hours of operation, yard standards, setback, buffering, road access and event.</p> <p>1) The basic concept behind ""levels"" or ""tiers"" has been raised and discussed at REDC ZOR Adhoc and ZOC. Some level of regulations are needed to address the issues encountered over the past 5-10 years due to the absence of regulations. 2) County Staff and Zoning Enforcement have agreed that the absence of regulations on the front end provide no approval or denial criteria during permit review, resulting in the inability to ensure proper location for a use required to be ""on a farm in the Commonwealth on land zoned agricultural."" 3) The Code of VA provision enables the ONLY permit approval criteria being in AR-1 or AR-2 agricultural zoned land, not on a ""farm."" The definition of ""farm"" would enable criteria to include proper location evaluation within AR-1/AR-2, not the entire district as a whole. 4) the absence of regulations also provides no means or mechanism for Zoning Enforcement to evaluate and enforce basic protections in line with other ag uses. Without a written regulation providing the benchmark criteria (i.e., levels, tiers, setbacks, parking, lighting, noise, buffering, etc.) Zoning Enforcement has nothing it can enforce to confirm or cancel a complaint. 5) OTHER VIRGINIA COUNTIES have implemented some additional regulations for events at farm wineries -- including but not limited to Albemarle, Clarke, Warren, Fauquier, Goochland, Prince William, Greene -- have applied zoning regulations for Farm Wineries and Distilleries in addition to Limited Breweries. See Virginia Counties Comparison Matrix https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-Virginia-Counties-Ordinance-Comparison.pdf</p>
#10864	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com</p>	<p>"3.05.08.04.B BREWERY LIMITED: B. Location. Through case studies and seven years of Use history, this use should be classified as ""High"" intensity. The scale and intensity of 250 people attending an event at a brewery on 10</p>

ID	Section
Date:7/9/2022	acres is far different than 250 people attending an event on 25 acres. A large problem exists where big events are taking place on small acreage. Staff Response: Staff will take a scale level chart under consideration 2022 Round 3 Input: To be CONSISTENT with other High intensity uses, the county must apply a Scale Level chart in that provides parking, yard standards, event, road access hours of operation standards based on acreage."
#10863	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.08.04. BREWERY, LIMITED. B. Location. 2022 Round 3 Input: To be CONSISTENT with the Code of VA regulation, the zoning requirement for ""at least 10 acres, owned or leased by the licensed limited brewery,"" should be revised to state ""EXCLUSIVE OF CURTILAGE"" (defined as area acres for residential household and adjacent outbuildings). The Code of VA provision enables the ONLY permit approval criteria being in AR-1 or AR-2 agricultural zoned land, not on a ""farm."" The definition of ""farm"" would enable criteria to include proper location evaluation within AR-1/AR-2, not the entire district as a whole."
#10862	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.08.04. BREWERY, LIMITED. REGULATIONS for parking. VaABC license regulations permit ""licensed areas"" to serve, that includes both indoor and outdoor square feet. Calculation for parking requirements, traffic trips, event patrons should be based on the full (indoor and outdoor) square footage. It is inconsistent to not have the same type of health, safety and welfare regulations. 2022 Round 3 Input: Attendance. Capacity for parking should be considered for outdoor (licensed) space and vehicular traffic to comply with Road access standards (5.09.01) A site visit should be required for all new establishments."
#9872	4.08.04 Brewery, Limited
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	VA code section 15.2 -2288.3.1 allows normal regulations to be imposed on breweries. It is imperative to set out standards for lighting, operating hours, music. Notice to neighbors is imperative. There should also be size limits, perhaps 15,000 sf with no more than 200 seats.
#9871	4.08.04 Brewery, Limited
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	It is IDIOCY to include limited breweries as agriculture unless a substantial portion of brews are made on-site with at least 50% of ingredients grown on-site. Move these and wineries to the Food & Beverage section. This won't change planned requirements for these places, but is logical.
#6299	4.08.04 Brewery, Limited

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/30/2021	General snotty comment: It appears that breweries, not citizens, are running the show.
#6298	4.08.04 Brewery, Limited
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/30/2021	The Prohibited Uses in F must be restored.
#6297	4.08.04 Brewery, Limited
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/30/2021	I object to the deletions in Brewery locations. These uses must be on a farm as defined by VA statute. They are supposed to be adjunct uses to a farm, not a roadside bar.
#6290	4.08.04 Brewery, Limited
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/30/2021	REDC will return to this when new uses are written as well as for farm winery.
#4404	4.08.04 Brewery, Limited
By: John Merrithew Tags: zoc Date:9/30/2021	Why was an onsite parking requirement removed?
#4702	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	The draft language was supported by some community members that have submitted public input expressing concerns over impacts of limited breweries on existing neighborhoods. The language was opposed by other community members who submitted public input expressing additional regulations would be harmful to the rural economy. Staff continued to vet the potential regulations for limited breweries and spoke with industry and the Department of Economic Development. After understanding the hardships these potential regulations would place on existing businesses, staff determined that it could not support the language endorsed by certain ZOC members, as staff does not support impacting the rural economy. In keeping with the established process for ZOC review, comment spreadsheets were provided back to ZOC reflecting staff's current position regarding changes to the brewery regulations.

ID	Section
#4403	4.08.04 Brewery, Limited
By: John Merrithew Tags: zoc Date:9/30/2021	If we are going to rely solely on the state to regulate breweries we should require all state approvals and any ongoing inspections be completed before local approvals and ongoing local approval contingent on any subsequent state inspections.
#4703	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted. This is a good discussion during Chapter 7: Procedures.
#4402	4.08.04 Brewery, Limited
By: John Merrithew Tags: zoc Date:9/30/2021	I find this State requirement interesting: The licensed premises shall be limited to the portion of the farm on which agricultural products, including barley, other grains, hops, or fruit, used by such brewery in the manufacture of its beer are grown and that is contiguous to the premises of such brewery where the beer is manufactured, exclusive of any residence and the curtilage thereof. It clearly requires agric production.
#4704	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted.
#4401	4.08.04 Brewery, Limited
By: John Merrithew Tags: zoc Date:9/30/2021	Is staff removing the requirement for farming because the State requires it? If so does the State require some proof that farming iOS occurring? The State requires growing some product on site but does not stipulate what amount. I suggest it does not preclude the locality from saying how much of the property has to be in farm operations, or at least repeating the state requirement that farming be done on the property and require some proof of production.
#4706	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted.
#3072	4.08.04 Brewery, Limited

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	I continue to believe that breweries and wineries should be in the Food & Beverage section, not in Agriculture.
#3560	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	noted. The intent is that a limited brewery be located on a farm, and must be on land zoned agricultural. See B.
#4400	4.08.04 Brewery, Limited
By: John Merrithew Tags: zoc Date:9/30/2021	Just to correct you Ryan, the brewery does not have to be on a farm. It just has to be on a 10-acre lot.
#4709	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted. language can be clarified if necessary for "Brewery, Limited." See 3.06.08.04.B.1 as well as the proposed (carry-over) definition: Brewery, Limited: A brewery licensed as a Limited Brewery in accordance with Section 4.1-208 of the Code of Virginia, as amended, and located on a farm in the Commonwealth on land zoned agricultural. For the purposes of this definition, "farm" shall be defined as one or more contiguous parcels of land, totaling a minimum of 10 acres in size, owned or leased by such licensed limited brewery.
#4399	4.08.04 Brewery, Limited
By: John Merrithew Tags: zoc Date:9/30/2021	B. Would staff explain the logic behind removing the requirement for farming operations on the same property as the brewery. Recommend that a minimum percentage of the area be used for agricultural purposes. This is essential to meeting goals of retaining the rural character of the RPA.
#4710	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	Staff intends to add a definition of "farm" which aligns with the Va state code definition. Staff will consider the recommendation of minimum percentage with the definition.
#4277	4.08.04 Brewery, Limited
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/22/2021	F should not be deleted

ID	Section
#4711	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted.
#3888	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	<p>"3.06.08.04.G BREWERY, LIMITED. Sketch Plan / Application Requirements. Statement indicates this section has been moved to a new heading, Application Requirements. Unless this relocated section for Sketch Plan includes the specific references required for Limited Breweries (i.e., tasting, storage, outdoor areas, 300' requirements from property line, etc.) then this section should REMAIN in Section 3.06.08.04.G to ensure all requirements are known and not omitted. Otherwise, a Site Plan should be required. It is important not to set a minimum distance from the Limited Brewery property line, as experience has shown that amplified entertainment and voices carry long distances, well beyond 300 feet. Will Uses with sketch plan vs. site plan requirements be denied approval if insufficient information is provided on an application? Can a permit be revoked if the Use after approval greatly exceeds the standards applied for after opening, based on inspection and volume of issues verified? 3.06.08.04.G BREWERY, LIMITEDS. APPLICATION REQUIREMENTS. BRMCA: Suggest that a site plan, including a professional survey of the property boundaries, plats of adjacent or across-the-street lots and their existing uses (residence, school, church, etc), and any existing wells, septic fields, structures, and distances from property lines; placement and plans for any new structures, wells, septic fields, outdoor seating, outdoor lighting, driveways, access points"</p>
#4713	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted.
#3887	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.04.F BREWERY, LIMITED. Prohibited Uses. These are in line with other counties. BRMCA asks whether additional prohibited accessory uses be added to include: Hot Air Balloon Rides; Carnival Inspired Games, (thinking shooting at targets for prizes), live auctions, and any use of firearms?
#3886	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc	3.06.08.04. BREWERY, LIMITED. E. Special Event. Review of current weekly newspaper and social media posts show the primary promotion is for current music performers and/or food trucks, not the agricultural product. Some are

ID	Section
Maura@Walsh-CopelandConsulting.com Date:9/6/2021	requiring ticket entrance. How does this make this use in compliance with Code of VA versus being an event venue?
#3885	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.04. BREWERY, LIMITED. E. Special Event. Use of portable facilities should be only allowed during the specific timing of a special event, not permanent sanitary facilities, circumventing Health Department requirements for adequate septic.
#3884	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.04. BREWERY, LIMITED. E. Special Event. What is the intent (or justification) for the condition that "subsequent special event shall be at least 2,000 feet from the location of the previous event"? A "one size fits all" approach of "250 persons in attendance" is inconsistent with other Agricultural operations that SCALE the quantity of patrons based on quantity of acres and/or size of structure.
#3883	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.04.D.2 & E.2 BREWERY, LIMITED. EVENT & SPECIAL EVENT PARKING. D.2. Events state all parking MUST be provided on site, whereas E.2. Special Events state all parking SHOULD be provided on site out of the public right-of-way. These requirements should be made consistent.
#4720	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted.
#3882	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.08.04. BREWERY, LIMITED. D. Limited Brewery Events. Referencing existing codes gives the County better oversight parameters, rather than using a # of attendees; it's difficult, if not impossible for anyone to document the numbers at any given time. If there is a way that a reliable figure could be used to limit the number of attendees/day? If not, then monitoring is an zoning enforcement impossibility, as enforcement is not available on the weekend except by appointment. In the MDODs, an Environmental Impact Review is required if parking for more than 100 vehicles is proposed. 3.06.08.04.D.1 BREWERY, LIMITED, PERMITTED BY RIGHT. How will the County monitor the number of attendees for compliance? Can a Brewery, Limited be permitted in ARS and ARN and MDOD lands by Special Exception only, not by right?"

ID	Section
#3881	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>"3.06.08.04. BREWERY, LIMITED. D. Limited Brewery Events & Special Events. Would the addition of the ""or similar activities"" would encompass ""Trivia Night""? If so, how would the included description for events evaluate the advertising of food truck and/or musicians in newspaper and social media postings on a weekly basis? What is the definition of ""planned?"" There is no real business marketing difference, evidenced by newspaper postings. This indicate that 250 patrons any night/week would be permitted, regardless of the size of the parcel, facility or operation. This is INCONSISTENT with other Agricultural operations that Scale the quantity of patrons based on quantity of acres and/or size of structure. OTHER COUNTIES have addressed this in various ways: https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-Virginia-Counties-Ordinance-Comparison.pdf ALBEMARLE COUNTY: Events (by-right) are permitted for Events, weddings, receptions etc. eligibility: Minimum 5 acres crops of fruits grains or other ag products planted on-site or adj. same owner in production (fermentation/bottling processes and on-site tasting room. BY RIGHT: not more than 200 in attendance at any time, subject to the following: ZONING CLEARANCE req'd if: Less than 21ac in size OR generates >50 vehicle trips/day, and <200 persons NOTICE: Written notice to adjacent lots for 1 or more events. Special Events: No kitchen service allowed for Special Events, portable toilets screened</p> <p>WARREN COUNTY: Usual and customary activities* for less than 100 persons in attendance at any organized event. Conditional use permit required for more than 100 persons. GOOCHLAND COUNTY: Weddings, receptions, reunions or similar on 50 acres or more must have: onsite fermentation; onsite tasting rm; minimum five (5) acres to agricultural products used in production of establishment's beverages. Max attendance calculated = (Parking x 4) - LESS occupancy of tasting room. Limit one event per week. Hours: End by 11pm Fri/Sat, by 10pm Sun thru Thurs. Event areas need 200'setback from all adj properties. Lighting must be dark sky compliant Special Event cannot occur more than eight (8) times per year PRINCE WILLIAM COUNTY: More than 150 people require temporary activity permit (Special event) CLARKE COUNTY: Classifies Special Event as a) Any assembly, attraction, ceremony, event, festival, gathering, circus, carnival, or show at which rides, games, competitions, attractions, music, dance, or other performing arts are engaged in by participants or provided as entertainment by professional or amateur performers or by prerecorded means, 1) Which involves the raising, charging, donating or re-couping of funds, 2) Which is held at any place other than on property owned by [Gov], or (2) In a permanent enclosed structure; 3) To which the public is invited or admitted;. . . and 5) Which occurs on a parcel of land of six or more acres (a parcel of land of six or more acres may include adjoining parcels with the same owner that have a total area of six or more acres). Event Hours: not permitted btw 12:00am to 7am Ticket admission to insure permit not exceeded"</p>
#3880	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc</p>	<p>"3.06.08.04.C.4.i BREWERY, LIMITED. Submitted recommendations for Hours of Operation. Weekdays: Monday through Thursday: 10:00 a.m until 9:00 p.m.</p>

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>3.06.08.04.C.4.ii BREWERY, LIMITED. Hours of Operation. Weekends Friday through Saturday: 10:00 a.m. until 11:00 p.m. 3.06.08.04.C.4.iii BREWERY, LIMITED. Hours of Operation. Sunday & Holidays: 10:00 a.m. until 5:00 p.m. P.S.https://law.lis.virginia.gov/vacode/title4.1/chapter1/section4.1-129/ Loudoun County can restrict wine/beer sales between 1pm Saturday through 6am Monday."</p>
#3879	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>"3.06.08.04.C BREWERY, LIMITED. LECA Input -- C. Intensity/Character. Can HOURS OF OPERATION be added to be CONSISTENT with other uses of similar scale and intensity. Commercial Winery is 10am to 10pm. Warren County applies the following hours of operation: Microbrewery (Limited Brewery) & Distillery : 9am to 5pm, Brewpub: 9am to 9pm, Winery: 9am to 10pm"</p>
#3878	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>"3.06.08.04. BREWERY, LIMITED. C. Intensity/Character. Parking ratios in the Use Table Matrix for Limited Breweries is ""1/1000 sf"". There is no clarification whether square feet applies to the Brewery structure or the Brewery overall VaABC licensed area. If the former, it will not address the (at times overflowing) parking situations in current Limited Brewery locations that have overflow parking, street parking where not permitted or safe, and parking on adjacent property front yards. A recommendation was made at the ZOC meeting in July for ZOR Staff to further review ACTUAL Limited Brewery parking to determine how to mitigate the safety, health, and welfare issues currently and when the new ordinance is applied. If Staff is unable to obtain a full and complete list of such cases and complaints via LEx, copies and photos can be sent to James David and/or ZORewrite@loudoun.gov."</p>
#3877	4.08.04 Brewery, Limited
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>"3.06.08.04. BREWERY, LIMITED. C. Intensity/Character. 1. 50 feet set back from all lot lines for ""outdoor tasting rooms or similar outdoor activities"" adjacent to residentially zoned property is inadequate and inconsistent for uses of similar scale and intensity. Numerous cases of disturbance of patrons, children and dogs roaming and trespassing property is a disturbance of peace and quietude, safety, and property rights for adjacent residents. Setbacks should be CONSISTENT for similar intensity uses. Consider regulations currently approved/used in other Counties: Albemarle County: Structures -- Fr-75'; Side 25'; Rr: 35' Parking: Fr: 75'; Side: 125'; Rr: 125' Fauquier County: Structures 300' from all lot lines"</p>
#4729	4.08.04 Brewery, Limited
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021</p>	<p>noted. staff will further consider adequate setbacks.</p>

ID	Section
#3876	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.04.B BREWERY LIMITED: B. Location. Through case studies and seven years of Use history, this use should be classified as "High" intensity. The scale and intensity of 250 people attending an event at a brewery on 10 acres is far different than 250 people attending an event on 25 acres. A large problem exists where big events are taking place on small acreage. To be CONSISTENT with other High intensity uses, can/will the county apply a Scale Level chart in that provides parking, yard standards, event, road access hours of operation standards based on acreage?
#4730	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	staff will take a scale level chart under consideration.
#3875	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.04 B. BREWERY, LIMITED. BRMCA Request: Add "A Limited Brewery is not allowed in the MDOD." [Consider in advance of Overlay District discussion.]
#4732	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	much of the properties the MDOD overlays are "Agricultural/Residential" districts. State code does not allow prohibiting the use in agricultural zoned areas.
#3874	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.08.04. BREWERY, LIMITED. B. Location. The definition of ""farm"" for this use is inadequate to define and enforce the proper siting of an agricultural use as intended by Section 3.2-300 of Code of VA. Specifically, that section refers to ""BONA FIDE"" (which translates to and is used in law to describe ""good faith"") ""agricultural operation"" or ""production of agriculture."" Numerous case studies, current operations and complaints have identified locations permitted as a ""Brewery, Limited"" that do not comply with the intent or ""bona fide"" production requirements and have no agricultural/production agriculture operation. As in other counties, will Staff add the regulation to stipulate 5 acres of active agricultural crops/production to be CONSISTENT with current LAND USE TAXATION requirements? § 3.2-300. Definitions. -- ""Agricultural operation"" means any operation devoted to the bona fide production of crops, or animals, or fowl including the production of fruits and vegetables of all kinds; meat, dairy, and poultry products; nuts, tobacco, nursery,

ID	Section
	and floral products; and the production and harvest of products from silviculture activity.-- ""Production agriculture and silviculture"" means the bona fide production or harvesting of agricultural or silvicultural products but shall not include the processing of agricultural or silvicultural products or the above ground application or storage of sewage sludge."
#4733	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	Staff are considering the defined terms and appropriate scale of agricultural operations.
#3873	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.08.04. BREWERY, LIMITED. B. Location. To be CONSISTENT with the Code of VA regulation, the zoning requirement for ""at least 10 acres, owned or leased by the licensed limited brewery,"" should be revised to state ""EXCLUSIVE OF CURTILAGE"" (defined as area acres for residential household and adjacent outbuildings). 3.06.08.04.B BREWERY, LIMITED. LOCATION. 10 acres as the definition of ""farm"" for Limited Breweries in ARS and ARN lands allows for potential development of these entities in environmentally sensitive lands, and neighborhoods. Special Events with amplified sound compound the problem for those lands. Could the acreage required in ARS and ARN lands be increased 20 acres to be consistent with current ARN, ARS Uses of similar high intensity? Confirm Section 3.06.01.B applies?"
#4734	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	Yes,Section 3.06.01.B applies.
#3872	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.08.04.A.5 BREWERY, LIMITED. PROPOSED LEGISLATIVE ACTION REQUEST -- VaABC PUBLIC NOTICE. State Code 4.1-230 outlines public notification requirements for applicants of an ABC license. Because Rural settings are unique in that long driveways and lot setbacks obscure interiors from public view, will Staff add qualifiers for Loudoun County to adequately implement the intent of the Statute with the requirement ""The applicant must post notice of the application on the front door of the building where s/he proposes to engage in businesses. In settings where no such building exists OR the setback of said building is such that it is not readily within public view, notice must be posted on the property in a location where it can be readily seen by the public. The notice must be of a size and quality that can be reasonably seen from the public roadway nearest the intended site. Posting on the property must be for as long as the application is under review"" ?"

ID	Section
#4735	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	The state statute applies regardless of the County's zoning regulations.
#3871	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.04.A.4 BREWERY, LIMITED. APPLICABILITY. BRMCA. This section is unclear whether it applies apply only to pre-existing buildings, or also newly constructed buildings, "ag barn" or otherwise. Can the wording be clarified?
#4737	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	There is currently no distinction. Adaptive reuse will be reviewed in section 5.09.
#3870	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.04.A.4 BREWERY, LIMITED. Will Staff consider requiring a "site plan" for sites to be reviewed by Fire, Rescue & Emergency Management, Traffic Division/VDOT, Health Dept, and Planning & Development, as each may have responsibility over components, such as vehicular access and lines of sight, First Responder access, septic, water, and impact on adjacent lots for the health, safety and welfare of residents and patrons?
#3869	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.04.A.3 BREWERY, LIMITED. With the known issues documented in LEX and case studies over the past seven years, related to well/septic non-compliance, Health Dept. permit violations, lack of capacity for size of facility and events this Use will Staff consider requiring a site plan" instead of "sketch plan" for the health, safety and welfare of the public?
#3868	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.08.04.A.2 BREWERY, LIMITED. APPLICABILITY. BRMCA State Code 4.1-206.1 Paragraph 4 states that limited Brewery licenses will be given to breweries "that manufacture no more than 15,000 barrels of beer per calendar year" but does not set a minimum amount of manufacture. Could a "brewery" produce one barrel of beer per year, source product from other brew manufacturers and function primarily as an Event/Music center? Fairfax County had Code of VA modified to add "Except for the limitation on land zoned

ID	Section
	"residential conservation," nothing in this definition shall otherwise limit or affect local zoning authority. Does this give Loudoun County a similar authority to set requirements for Limited Breweries in ARS and ARN and MDOD lands?"
#4742	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	staff will further research
#3867	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.04.A.2 BREWERY, LIMITED. APPLICABILITY. BRMCA: State Code 4.1-206.1 Manufacturer license, Effective July 1, 2021 speaks to Limited Distillers licenses, limited brewery licenses, winery licenses, farm winery licenses, and Beer importer licenses. How will/are Limited Breweries, and others now included, in operation BEFORE this date be governed now? and when the new code is implemented?
#4743	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	Staff cannot speak to the implementation and enforcement of state code without further review from the County Attorneys Office.
#3866	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.08.04. BREWERY, LIMITED. A.4. Applicability. Although pleased to see the change from ""requested"" to ""must"" contact Fire/Rescue and Dept. of B&D, the requirement for only an ""informational inspection"" is insufficient to ensure the health, safety and welfare of owners and patrons. Specifically, what happens when an ""informal"" inspection identifies violations? What documentation/record of the inspection is retained? What requirement does the owner have to repair/comply with safety ordinances? What enforcement/recourse is there if the owner fails to make repairs and/or comply? As noted in numerous case studies and written complaints, facilities used have not had electrical, plumbing or fire code inspections. https://loudouncoalition.org/2020/04/rural-uses/ If Staff is unable to obtain a full and complete list of such cases and complaints via LEx, copies can be sent to James David and/or ZORewrite@loudoun.gov."
#3865	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com	"3.06.08.04. BREWERY, LIMITED. MISSING REGULATIONS. County internal process for all VaABC opinion letters should require proactive response and request for status to Planning & Zoning. [Documenting request in Uses in advance of Procedures discussion] -- A response is required from County

ID	Section
Date:9/6/2021	<p>Attorney is required to indicate contact and status from Zoning (use permitted on parcel/location), Building & Development (if application indicates Ag Structure) and Health Department (if application indicates “tasting room,” events or includes bathroom, kitchen requiring septic). -- County should be required to inform VaABC when applicant is in known violation of Code of Va § 4.1-225-2.a. The place occupied by the licensee: a. Does not conform to the requirements of the governing body of the county, city or town in which such establishment is located, with respect to sanitation, health, construction or equipment, or to any similar requirements established by the laws of the Commonwealth or by Board regulations.-- VaABC should be notified of County objection within the 30 day time limit if Zoning, B&D, HD issues or non-compliance are determined.</p> <p>-- No Waivers should be granted for non-compliance with State requirements (e.g., use of local well as water source prior to or without ODW certification of non-transient community waterworks). RECOMMENDATIONS: State Legislative -- VaABC application Posting and Publishing notice requirements are insufficient. Request State changes to VaABC application and process to require 1) written notification to adjacent property owners; 2) Publishing in local paper with known distribution to adjacent property owners (i.e., not publications known not to be available or delivered to adjacent property owners); 3) Posting requirements should be required on posts/stakes at two locations on the edge of the applicant property, clearly visible to all adjacent property owners (not “front door”)."</p>
#4745	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	While the county reviews VAABC opinion letters, as an informed entity, the county currently does not provide proactive enforcement. Implementation of VAABC laws is beyond the scope of the ZO.
#3864	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	<p>"3.06.08.04. BREWERY, LIMITED. MISSING REGULATIONS. County Zoning permits and approvals have been provided in advance of approval of Virginia Health Department, Virginia Office of Drinking Water (ODW), and Virginia Department of Agricultural Consumer Services (VDACS).</p> <p>RECOMMENDATIONS: -- All required water, sewer and environmental actions required by the Commonwealth of Virginia for the facility must be completed prior to the facility being approved for operation by the County.-- Conditional approval while waiting for completion of actions is not recommended, as in numerous cases State requirements were not completed until after complaints and notices of violation."</p>
#3863	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	<p>"3.06.08.04. BREWERY, LIMITED. MISSING REGULATIONS. As indicated in 2017-2018 case studies and review of other county ordinances, Loudoun County CAN add regulations for the health, safety and welfare of the public. VIRGINIA COUNTIES COMPARISON REPORT* summarizes regulations other counties have approved and implemented for: 1) Minimum crop acre production,</p>

ID	Section
	2) Maximum attendees for Events and Special Events 3) Yard standards for front yard, side yard, rear yard. 4) Landscaping/buffering/screening, 5) ROAD ACCESS and heavy equipment, 6) Exterior lighting, including Dark Sky requirements for lighting on ridge lines/slopes in MDOD (seasonal or otherwise). 7) NOISE. 8) Hours of Operation *VIRGINIA COUNTIES COMPARISON REPORT - 2021 UPDATE (https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-Virginia-Counties-Ordinance-Comparison.pdf)"
#3862	4.08.04 Brewery, Limited
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	<p>"Due to the volume of LCPCC member comments, public comments, and comments at ZOC meetings, the input for the Limited Brewery use is expanded to include links to County documents from 2014-2016 for history and confirmation that Staff's original 2014 professional opinions to include performance standards were correct.-- As indicated previously, the primary factors requiring review for zoning regulations are ZONING INCONSISTENCY (i.e., inconsistent and/or non-existent Rural Use performance standards) plus LOCATION AND INTENSITY IMPACTS. -- From the standpoint of impacts and necessity of performance standards, it does not matter if a business makes wine, beer, pink lemonade or milkshakes; it does not matter if the operation is a wedding venue, pick your own farm, equestrian facility or corn maze. What matters is the Scale, Intensity and Impacts to adjacent and vicinity properties for: hours of operation, quantity of attendees, yard setbacks, buffering, parking, road access/traffic, lighting and noise; compliance with water & waste with the Health Department and Office of Drinking Water, and the filing of permits for Zoning and Building & Development. ZOC's (and Staff's) duties are to correct errors and inconsistencies; clarify regulations; and address specific issues. The following provide direct support for those duties: -- The 11-21-14 TLUC Report for ZOAM 2014-0003-Limited Breweries (https://loudouncoalition.org/wp-content/uploads/2020/04/11-21-14-TLUC-Report-Limited-Breweries.pdf) Agency referral and Staff comments indicated multiple areas of concern for the health, safety and welfare of residents and patrons during the development of the 2014 Limited Brewery ZOAM. The original 10-07-2014 PC WS-Staff Report-Limited Brewery Use Regulations DRAFT TEXT included performance standards recommended for approval for the ZOAM. (https://loudouncoalition.org/wp-content/uploads/2020/04/10-07-2014-PC-WS-LIMITED-BREWERY.pdf) -- However, 2014-ZOAM Meeting Summaries from June through November 2014 (https://loudouncoalition.org/wp-content/uploads/2020/04/2014-ZOAM-Meeting-Summaries.pdf) show that ZOAG's position was to "treat Limited Breweries the same as Farm Wineries," with the support and direction of a former Supervisor and TLUC Chair. -- Staff's position was changed after the October 2014 Planning Commission Worksession/Public Hearing that included only business stakeholder input for text to include only a "sketch plan" and no performance standards. -- Although citizens did attend one or more of these 2014 meetings where business stakeholders were allowed to speak, citizens were not permitted to provide evidence/information in support of Staff's position. (Public input not allowed until January 2017.) -- In summary, numerous Staff departments expressed concerns about permitting a Limited Brewery use without performance standards, but were overruled by ZOAG, the Planning Commission and BOS. Since that time, numerous complaints and evidence have confirmed</p>

ID	Section
	and verified that Staff was right in 2014. -- The following information is submitted to support Staff's 2021 position, and clarify additional regulations omitted from ZOR Round 1 & 2 input, or Staff has yet to receive as formal input to make Limited Brewery regulations consistent with like high-intensity uses.
#3548	4.08.04 Brewery, Limited
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:8/29/2021	Don't understand the events. How are they distinguished from day to day operations? What would be the point of the distinction.
#3557	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	agreed. language added in D. and E. in attempt to clarify.
#3449	4.08.04 Brewery, Limited
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	Why are the lot lines and set backs for these problematic and often non agricultural businesses less stringent than for actual agricultural/farm tourism operations? Minimum set backs should match the standards applied to other ag tourism operations.
#3558	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	This is up for consideration and discussion. Contemplating the outdoor tasting area at 50' for limited breweries, in comparison, the outdoor private party area of banquet/event facilities is 100-200'. Agree that similar uses should be comparable.
#3073	4.08.04 Brewery, Limited
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	D.1. Limit this to 100 persons. Breweries are a great rural economy use, but let's not turn western Loudoun into Party Central with large gatherings.
#3559	4.08.04 Brewery, Limited
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	Open for discussion. Staff compared the limits to other jurisdictions. Text in question has been removed.

ID	Section
#10967	4.08.03 Agriculture Support Use (Standalone)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.03. AGRICULTURE SUPPORT USE (STANDALONE). LCEA Input -- Same comments as Ag Support Use Direct Association: B.4. LCEA indicates the hours of operation may not be sufficient for equestrian facilities, due to the time required to prepare horses and riders for events. C.1. Structure footprint may be too small for stables and indoor arenas. This should be discussed with industry experts in LCEA G. (removed in 9/8/21 draft). This use may require specific lighting use standard exception for requirements for evening riding events, for the safety of both animals and riders. Staff response: ""Noted.""
#10963	4.08.03 Agriculture Support Use (Standalone)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.03. AGRICULTURE SUPPORT USE (STANDALONE). B.2. Visitors/Customers/Parking Spaces. The ""math"" could be used for parking space calculation, but how would/could the quantity of visitors, customers or cars allowed on site at any one time be approved OR enforced? Staff Response: Enforcement will be dependent on zoning permit approval."
#10962	4.08.03 Agriculture Support Use (Standalone)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.03 Agriculture Support Use (Standalone). 2022 Round 3 Input: Ag Education or Research Center requiring 25 acres for 200 attendees is inconsistent and may be high when Event Facilities can be on 20 acres for 200 attendees. (To make consistent, Event facilities may require larger parcels than 20 acres in rural areas.)"
#9867	4.08.03 Agriculture Support Use (Standalone)
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	"Farm distribution hub" is not defined anywhere. "Stable, livery" is the correct label.
#6289	4.08.03 Agriculture Support Use (Standalone)
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/30/2021	3.06.08.02 and 3.06.08.03 Ag support uses: Why is equine in this and not under general Ag? All three equine facility types should be under ag. Why is equine event center and stable livery singled out at 25 acres minimum? Hours of operation may be too restrictive for equestrian. This needs to be better defined. Is this the hours during which an event may be held in total or hours during which the operation may be open? Why are there restrictive hours for equestrian livery and event uses and none for winery or limited brewery? Again, consider regulations that fit across similar uses.
#3854	4.08.03 Agriculture Support Use (Standalone)

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.08.03. AGRICULTURE SUPPORT USE (STANDALONE). LCEA Input -- Same comments as Ag Support Use Direct Association: B.4. LCEA indicates the hours of operation may not be sufficient for equestrian facilities, due to the time required to prepare horses and riders for events. C.1. Structure footprint may be too small for stables and indoor arenas. This should be discussed with industry experts in LCEA G. (removed in 9/8/21 draft). This use may require specific lighting use standard exception for requirements for evening riding events, for the safety of both animals and riders."
#3853	4.08.03 Agriculture Support Use (Standalone)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.02. AGRICULTURE SUPPORT USE (STANDALONE). B.2. Visitors/Customers/Parking Spaces. The "math" could be used for parking space calculation, but how would/could the quantity of visitors, customers or cars allowed on site at any one time be approved OR enforced?
#4698	4.08.03 Agriculture Support Use (Standalone)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	Enforcement will be dependent on zoning permit approval.
#3536	4.08.03 Agriculture Support Use (Standalone)
By: John Merrithew Tags: zoc Date:8/29/2021	I don't understand the minimum lots sizes. Are the listed uses all that are considered ag support standalone? If so why have a 5-ac minimum size in B.1.?
#3570	4.08.03 Agriculture Support Use (Standalone)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	The existing definition that will be carried-over: A Use Category that includes uses and activities that provide support and services to agricultural, horticultural and animal husbandry activities, either on the site of the agricultural, horticultural or animal husbandry activity, or off-site. These uses include: agricultural research facility; animal care businesses; central farm distribution hub for agricultural products; equestrian event facilities; horse trails or networks; farm machinery repair; farm machinery sales, rental and service; feed and farm supply centers; nurseries, commercial; stables, livery; stable, private; and similar uses.
#13569	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:7/18/2022	Farm Bureau 3.05.08.02.B.03 This size of lot/use table is unfairly applied to agricultural businesses while "limited breweries" far exceed the limits here. Why are we offering special privileges to businesses in the RPA who are often in no way supporting agriculture while regulating actual agricultural operations? This

ID	Section
	imbalance must be corrected so our businesses are operating on an equal playing field.
#12905	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	Farm markets are associated with this category of Use specific standards, without a distinction made between on-or-offsite farm markets. Is this intended? What if there is on-site agricultural activity but it is not directly connected to the farm market on the site? Is this the appropriate section to look at for use-specific standards?
#10965	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.02. AGRICULTURE SUPPORT USE (DIRECT ASSOCIATION). LCEA questions why equine is in this grouping; Equine uses should all be together in one section under agriculture. At one time there were four stable uses, private, livery A, livery B and event facility, when were they reduced to two levels/uses? The intended difference was that Livery A could be less than 25 acres, B was 25 acres min.. They differed from equestrian event facilities in that horses could also be permanently housed there, whereas an equestrian event facility was just the venue. Staff response: ""Noted.""
#10964	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.02. AGRICULTURE SUPPORT USE (DIRECT ASSOCIATION). B.4. LCEA indicates the hours of operation may not be sufficient for equestrian facilities, due to the time required to prepare horses and riders for events. C.1. Structure footprint may be too small for stables and indoor arenas. This should be discussed with industry experts in LCEA G. (removed in 9/8/21 draft). This use may require specific lighting use standard exception for requirements for evening riding events, for the safety of both animals and riders. Staff response: ""Noted.""
#6288	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/30/2021	3.06.08.02 and 3.06.08.03 Ag support uses: Why is equine in this and not under general Ag? All three equine facility types should be under ag. Why is equine event center and stable livery singled out at 25 acres minimum? Hours of operation may be too restrictive for equestrian. This needs to be better defined. Is this the hours during which an event may be held in total or hours during which the operation may be open? Why are there restrictive hours for equestrian livery and event uses and none for winery or limited brewery? Again, consider regulations that fit across similar uses.

ID	Section
#3852	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.08.02. AGRICULTURE SUPPORT USE (DIRECT ASSOCIATION). B.4. LCEA indicates the hours of operation may not be sufficient for equestrian facilities, due to the time required to prepare horses and riders for events. C.1. Structure footprint may be too small for stables and indoor arenas. This should be discussed with industry experts in LCEA G. (removed in 9/8/21 draft). This use may require specific lighting use standard exception for requirements for evening riding events, for the safety of both animals and riders."
#3851	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.08.02. AGRICULTURE SUPPORT USE (DIRECT ASSOCIATION). LCEA questions why equine is in this grouping; Equine uses should all be together in one section under agriculture. At one time there were four stable uses, private, livery A, livery B and event facility, when were they reduced to two levels/uses? The intended difference was that Livery A could be less than 25 acres, B was 25 acres min.. They differed from equestrian event facilities in that horses could also be permanently housed there, whereas an equestrian event facility was just the venue."
#3850	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.02. AGRICULTURE SUPPORT USE (DIRECT ASSOCIATION). B.3. Visitors/Customers/Parking Spaces. The "math" could be used for parking space calculation, but how would/could the quantity of visitors, customers or cars allowed on site at any one time be approved OR enforced?
#4696	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	Enforcement will be dependent on zoning permit approval.
#3543	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:8/29/2021	I find this use title confusing. If it is ag support, then to me it should include processing, equipment repair, nurseries, etc. As it is, it should be titled equestrian riding facilities.

ID	Section
#3579	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	Many of these suggested uses are within the current definition (Agricultural Support and Services Directly Associated with On-going Agricultural Activity, On-Site) that will be carried over: A Use Category that includes uses that provide support and services to agricultural, horticultural and animal husbandry activities, which are limited to and that operate in conjunction with and on the site of on-going agricultural, horticultural or animal husbandry uses. These uses include: agricultural processing; agri-education; animal care businesses; commercial wineries; custom operators (haymaking, brush hogging, crop storage, hauling, fencing, barn construction); direct market businesses for the sale of products produced on-site, including but not limited to PYO (pick-your-own); equestrian event facilities; horse trails or networks; farm co-ops; farm based tourism events; farm markets; farm machinery repair; feedlot (for on-going, on-site, animal husbandry activities); nurseries, commercial; pet farms; products combining recreation with consumption of agricultural products; portable sawmills; small business uses; stables; stables, private; wayside stands; wetlands mitigation banks; and similar uses.
#3066	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Suggest 10 acres for equestrian event facility and 15 acres for livery stable.
#3580	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	These are existing minimums, but are open for discussion.
#3065	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	I don't see section 5.07.03.A.6, Buffers, but regardless there should be NO buffer requirement for barns, run-ins, sheds, etc. in the RPA.
#3582	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov	These references are being moved to under "Purpose and Applicability" of this section. However, in the text that is being developed, agriculture/Horticulture /Animal Husbandry and Passive Uses have an 'N/A' in the buffer yard table.

ID	Section
Date:8/31/2021	
#3063	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Where is this defined? Is the intent that this be for barns, etc.?
#3583	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	I don't see the link to what needs to be defined. If it is for this whole section, the existing definition is in my reply #3579 to John Merrithew's comment #3543
#3062	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Suggest 10 acre minimum for equestrian event center and 15 acre minimum for livery stable.
#3584	4.08.02 Agriculture Support Uses (Direct Association with On-Site Agricultural Activity)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	These are existing minimums, but are open for discussion.
#10966	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.08.01 AGRICULTURE, HORTICULTURE and ANIMAL HUSBANDRY. Loudoun County Equine Alliance (LCEA) indicates this is where ALL equine uses should be set out. Where are additional equestrian uses? Staff response: ""Noted.""
#10961	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com	"3.06.08.00. AGRICULTURE. What changes are planned by Staff to address the known/documented loophole of ""agricultural building"" applications for new high-intensity uses with large volumes of public attendance? As Staff is aware,

ID	Section
Date:7/9/2022	<p>Property owners have been applying for an “agricultural building” (that does not require any building permits or safety inspections), for use as a non-ag public use event venues. -- Use of this permit loophole has become “normal,” without review by zoning, building & development prior to application approval. This is a health, safety and welfare issue for the general public, as “ag buildings” used for events may be unsafe for the general public. -- How can/will Staff ensure any buildings being added to the property to support the special usage will be permitted, zoned, sized and designed to be compatible with buildings in the surrounding area? -- Can Buildings found to be permitted as an “ag barn” not used as such be fined and have other zoning use permits revoked?</p> <p>-- Historic and existing agricultural buildings applying for “adaptive reuse” should NOT have the same building code requirements as new structures. Has Staff reviewed and/or revised applicable “adaptive reuse” business code requirements for the appropriate use of barns or other historic and existing ag structures. [Example – exit signs are appropriate, but addition of safety doors vs. barn doors may not be appropriate. [Comments submitted in advance of development standards as this is key for Use-Specific Standards approval.]”</p>
#9866	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	By the way, how would you ever enforce E.6.? (One more example of the intrusiveness of the CFP requirement.)
#9865	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	B.2. an C should be deleted. This requirement does not meet the standards of the state Right to Farm Act, which limit regulations to those which protect the health, safety and general welfare." Worse, this requirement is counter to the goal of maintaining equine and other agricultural operations, esp. as part of Loudoun's heritage and image. Two of our paddocks are around 3.5 acres and they easily accommodate 2 horses.
#3849	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.08.01 AGRICULTURE, HORTICULTURE and ANIMAL HUSBANDRY. Loudoun County Equine Alliance (LCEA) indicates this is where ALL equine uses should be set out. Where are additional equestrian uses?
#4689	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted

ID	Section
#3060	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	C - Conservation Farm Plan -- is serious overkill. Delete it.
#3601	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	noted.
#3682	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/1/2021	Having seen the effect of too many horses on a small plot of ground, I feel we need some form of farm management plan for small properties. Overgrazing leads to erosion, which leads to silty run-off and impacts on adjacent properties and streams--not to mention the Chesapeake Bay itself.
#4690	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	staff supports draft language. the Conservation Farm Plan utilizes the professionals in extension and LCSWCD to appropriately define intensity of agricultural use.
#3535	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: John Merrithew Tags: zoc Date:8/29/2021	D. should refer to "new" structures. Existing structures should not become legal nonconforming so they cab be maintained and modified,
#3598	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Thank you, we will follow up with corrected language.
#3534	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: John Merrithew Tags: zoc Date:8/29/2021	Does executed plan mean a signed off/approved plan or is the owner implementing the plan?
#3599	4.08.01 Agriculture, Horticulture and Animal Husbandry

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	carry-over language, but replaced with "obtain"
#3061	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	D. Very sloppy language makes this hard to understand.
#3600	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	This is carry-over language, but we will look at correcting / clarifying the language
#4691	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	revised for clarification.
#3058	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	B.2. Suggest minimum lot of 3 acres.
#3602	4.08.01 Agriculture, Horticulture and Animal Husbandry
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Carry-over language, but open for discussion
#3848	4.08 Agriculture
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.08.00. AGRICULTURE. What changes are planned by Staff to address the known/documented loophole of ""agricultural building"" applications for new high-intensity uses with large volumes of public attendance? As Staff is aware, Property owners have been applying for an "agricultural building" (that does not require any building permits or safety inspections), for use as a non-ag public use event venues.-- Use of this permit loophole has become "normal," without review by zoning, building & development prior to application approval. This is a

ID	Section
	<p>health, safety and welfare issue for the general public, as “ag buildings” used for events may be unsafe for the general public.-- How can/will Staff ensure any buildings being added to the property to support the special usage will be permitted, zoned, sized and designed to be compatible with buildings in the surrounding area? -- Can Buildings found to be permitted as an “ag barn” not used as such be fined and have other zoning use permits revoked? -- Historic and existing agricultural buildings applying for “adaptive reuse” should NOT have the same building code requirements as new structures. Has Staff reviewed and/or revised applicable “adaptive reuse” business code requirements for the appropriate use of barns or other historic and existing ag structures. [Example – exit signs are appropriate, but addition of safety doors vs. barn doors may not be appropriate. [Comments submitted in advance of development standards as this is key for Use-Specific Standards approval.]”</p>
#3847	4.08 Agriculture
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>"3.06.08.00. AGRICULTURE. ""Aug. 25th Comments RE: ZOAM-2015-0006. DEFINITION OF """"FARM"""" / Agricultural Operation – er Item 10a, BOS/TLUC report April 19, 2018-ROIA for ZOAM-2015-0006, Ag Operations and Definition of Farm were to be reviewed. How have the following changes been incorporated in the Draft Text? Add new “Agricultural Operation,” “Agricultural Products” and “Farm” definitions. The Ordinance currently does not define either Agricultural Operation, Agricultural Products, or Farm; however, these terms are consistently referenced throughout the Zoning Ordinance. The Code of Virginia defines these terms and references these terms in relation to agricultural activities and local regulation of agricultural activities, such as Limited Distillery, Limited Brewery, Farm Winery, and Agricultural Processing. Amendment creates new definitions to provide clarity in distinguishing agricultural properties and functions, maintains consistency with the Code of Virginia, and eliminates inconsistency and avoid misunderstandings with the Ordinance. Source of Proposed Amendment*: Staff recommends to align terminology with Code of Virginia"""</p>
#4688	4.08 Agriculture
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021</p>	<p>staff is currently evaluating additional definitions to clarify and align with VA state code.</p>
#13916	4.07.07 Utility Substations
<p>By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/18/2022</p>	<p>As Substation design trends towards enhanced screening, their should be an exclusion for any "structures" towards site FAR and lot coverage, whose purpose is to provide additional screening of equipment.</p> <p>There is in intended consequence of creative screening for these facilities which would reduce FAR on the parcel for other development uses.</p>

ID	Section
#11531	4.07.07 Utility Substations
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/13/2022	Section E.- IS Type C buffer required along roadways? or does the required Road Corridor buffer prevail? This needs to be clarified.
#11526	4.07.07 Utility Substations
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/13/2022	3.05.07.D - If Substation is shown on an approved CDP, then Commission permit should not be required. Suggest add language, ".....unless otherwise shown on an approved Concept Development Plan."
#3546	4.07.07 Utility Substations
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:8/29/2021	D. is not "specially" designated. Either "specifically designated" or "shown" the comp plan. Substations are popping up like data centers and we should be trying to maximize the sites we already have. Any way of limiting sites to a certain distance of major powerlines, or requiring they not be visible from roads...etc.
#3603	4.07.07 Utility Substations
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	carry-over language corrected, replaced with "specifically" open to ideas that would be appropriate
#3045	4.07.07 Utility Substations
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:8/23/2021	<ul style="list-style-type: none"> - Sec D: Add language "A Commission Permit is required unless the utility substation is specially delineated in the Comprehensive Plan or shown on Concept Development Plan approved by Board of Supervisors" - Sec E: Need additional consistency and clarification on buffer requirements along roadways. Do Road corridor buffer supersede this requirements or does Type C buffer supersede? Sec E: Additional clarification and consistency when Substation is located within property developed for data center uses. Safety and security concerns make any buffer plantings impractical around internal substations perimeter directly adjacent to Data Center buildings on-site. Additionally, Data Centers often require different buffer yards. ZO should allow for simple adjustments when existing buffer is installed (or shown on approved site plan) rather than a retrofit which results in complex SPAM process simply to slightly increase plant quantities.
#3604	4.07.07 Utility Substations
By: Ryan Reed Tags: staff	Thank you, we will further review each of these suggestions.

ID	Section
ryan.reed@loudoun.gov Date:9/1/2021	
#10959	4.07.06 Telecommunications Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.07.06.B.1.a TELECOMMUNICATIONS FACILITIES. "...mounted on buildings and structures and connected TO unmanned..." ? Wording? 3.06.07.06.C.2 TELECOMMUNICATIONS FACILITIES In MDODs, must NOT be permitted within 200 feet of a ridge line. In sensitive viewsheds, monopoles should be camouflaged, which has been done in sensitive locations (i.e. to look like trees.) Retain for MDOD discussions. 3.06.07.06.D TELECOMMUNICATIONS TOWERS. In MDODS, must NOT be permitted within 200 feet of a ridge line. Retain for MDOD discussions.Staff response: ""Noted.""
#9864	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	4.a. Same comment re visualizations as for monopoles.
#9863	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	3.b. "Downslope" from ridgelines might be only a few feet, so state that they must be at least 200 lateral feet from ridgeline.
#9862	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	What is a "telecommunications tower"? It is not in the definitions.
#9861	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	4.c. Meetings with residents must be mandatory.
#9860	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc	4.b. Who determines whether something is feasible?

ID	Section
CharlesHouston3@yahoo.com Date:4/24/2022	
#9859	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	3.0. Prefer to prohibit these within the MDOD. If not, then prohibit within 250' of the ridgeline.
#9858	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	3.n. Change 1 mile to three miles. That's more realistic. HOWEVER, photos of the simulation should be taken from 1/4 mile from the proposed tower location. (A simulation from 1 or more miles won't give a true perspective.)
#9857	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	2.d. Delete "private" before "toll road," as eventually the Greenway will be publicly owned.
#9856	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	3..a. What is an "antenna hub site"? It is not in the definitions.
#10230	4.07.06 Telecommunications Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/16/2022	Telecommunications Antenna Hub Site: An area containing one or more unmanned equipment structures sited to serve telecommunications antennas. An antenna hub site may be located on the same lot as the antennas being served or located on a lot that does not contain the antennas being served.
#9855	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Telecommunications Facility should require SPEX in all districts. Notice to neighbors should be mandatory.

ID	Section
#9854	4.07.06 Telecommunications Facility
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Title: Definition says "telecommunications use or structure." That should be the title of this section as it's clearer than "facility."
#6286	4.07.06 Telecommunications Facility
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021	3.06.07.07 Telecommunications Facility: Where allowed? Structure Type? Could monopoles be placed in residential communities?
#3846	4.07.06 Telecommunications Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.07.07.B.1.a TELECOMMUNICATIONS FACILITIES. "...mounted on buildings and structures and connected TO unmanned...." ? Wording? 3.06.07.07.C.2 TELECOMMUNICATIONS FACILITIES In MDODs, must NOT be permitted within 200 feet of a ridge line. In sensitive viewsheds, monopoles should be camouflaged, which has been done in sensitive locations (i.e. to look like trees.) Retain for MDOD discussions. 3.06.07.07.D TELECOMMUNICATIONS TOWERS. In MDODS, must NOT be permitted within 200 feet of a ridge line. Retain for MDOD discussions."
#3845	4.07.06 Telecommunications Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.07.07. TELECOMMUNICATIONS FACILITY. C.3.i. and D.3.i. Why was the prior regulation of "no commercial advertising or signs shall be allowed on a monopole/tower" deleted from this draft text? How will signs on a monopole comply with the signs ordinance?
#4685	4.07.06 Telecommunications Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted. staff will review under the context of the sign ordinance.
#3844	4.07.06 Telecommunications Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com	3.06.07.07 TELECOMMUNICATIONS FACILITY: o. "if a telecommunications monopole is proposed on a property listed on the National Register of Historic

ID	Section
Date:9/6/2021	Places" Change this sentence to state "on or near a property listed on the National Register..." ("Near" should be a defined distance.)
#4686	4.07.06 Telecommunications Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	revised language for clarification and additional consideration near properties listed on the National registry.
#3197	4.07.06 Telecommunications Facility
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Input from people involved in stopping AT&T's plans on Short Hill: "The top of a monopole or antenna should not exceed the elevation of the ridgeline." Thus the pole must be put further downslope. I concur.
#3606	4.07.06 Telecommunications Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Noted. Keep this issue in mind when reviewing the overlay districts.
#3056	4.07.06 Telecommunications Facility
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Telecommunication towers - suggest same language on location/elevation as I suggested for monopoles - keep them away from ridgelines.
#3605	4.07.06 Telecommunications Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Thank you. Keep that thought when reviewing the proposed MDOD / ridgeline setbacks and see if they address your concerns.
#3054	4.07.06 Telecommunications Facility
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	The intent of 3.o is good but the language needs work. I suggest prohibiting any monopole from locating at an elevation within 20 feet of the ridgeline.
#3607	4.07.06 Telecommunications Facility
By: Ryan Reed Tags: staff	Thank you. When you review the proposed ridgeline setbacks let us know if that addresses your concerns.

ID	Section
ryan.reed@loudoun.gov Date:9/1/2021	
#3053	4.07.06 Telecommunications Facility
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.c. A 199 foot height? Insane!
#3052	4.07.06 Telecommunications Facility
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Delete 1.d. AT&T is promoting a first-responders service that requires monopoles. It could simply offer free service to, say, a volunteer fire department in return for co-locating a monopole. AT&T could then build whatever it wished, with no public review. (This is a lesson-learned from the Short Hill situation.)
#3609	4.07.06 Telecommunications Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	1.d allows a monopole to be located by-right as an accessory use at a fire or rescue station. This does not allow a monopole by-right anywhere it provides service to first-responders.
#3049	4.07.06 Telecommunications Facility
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	1.j. A max height of 199' seems crazy
#3048	4.07.06 Telecommunications Facility
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	d. should say max diameter of dish antennae is 6'
#3611	4.07.06 Telecommunications Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	This is carry-over language. Is there a basis increase the diameter?

ID	Section
#3047	4.07.06 Telecommunications Facility
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	B.1.b should say "the lesser of 20 feet..."
#3612	4.07.06 Telecommunications Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	reverted back to existing language (except replacing "shall" with "must") which I think clarifies your point.
#14173	4.07.05 Stockpiling
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/19/2022	Despite a strong stockpiling ordinance, stockpiling masquerading as other uses (i.e. driveways, polo fields) have occurred. Additional measures in the FSM relating to driveway dimensions and base, erosion and sediment controls may help to limit abuses. Stronger enforcement measures and fines for misrepresentation on permits are recommended.
#9853	4.07.05 Stockpiling
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Notice to neighbors should be mandatory.
#3843	4.07.05 Stockpiling
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.07.06 STOCKPILING, Can Staff Add new heading: "PUBLIC NOTICE, Neighborhood Meetings and Special Exception"? Define when these are required and under what circumstances to help protect the environment and the health and safety of residents and to stop unregulated dumps.
#4669	4.07.05 Stockpiling
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	As proposed, stockpiling is only permitted via SPEX in TIE & JLMA-LI, therefore requiring public notice.
#3842	4.07.05 Stockpiling

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	<p>"3.06.07.06 STOCKPILING, Can Staff Add new heading: ""NARRATIVE""? Narratives should be required and provide justification for the amount of stockpiling/excessive fill required for a project.</p> <p>3.06.07.06 STOCKPILING, Can Staff Add new heading: ""TIMELINE""? Should there be a time limit for completion of the stockpiling/excessive fill projects to protect the public from hazards such as noise, traffic, runoff and other nuisances?"</p>
#4670	4.07.05 Stockpiling
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted. staff will consider a time-scope for each stockpiling project
#3841	4.07.05 Stockpiling
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.07.06 STOCKPILING, Can Staff Add new heading: "Surface water, Groundwater"? How will surface water and groundwater on or around the stockpile/excessive fill sites be monitored to assure that the dirt is not contaminated? Will stagnant pools and undrained pockets be permitted, and if so, will they follow Virginia Department of Health rules? Should the owner of a stockpile/excessive fill site be required to periodically test groundwater if the site is beyond a certain volume?
#4671	4.07.05 Stockpiling
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted. staff will consider additional surface and groundwater standards
#3840	4.07.05 Stockpiling
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.07.06. STOCKPILING. H. "A Zoning Permit and grading permit" should require the volume of dirt required prior to the commencement of the Stockpiling. This was added to B&D forms -- should it be referenced in the ZO?
#4672	4.07.05 Stockpiling
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted. staff will consider proposing the same thresholds.
#3839	4.07.05 Stockpiling

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.07.06 STOCKPILING, D. MATERIALS. Can Staff Add "Liquid Dumping" under the MATERIALS heading? Why is there no statement under this section that liquid dumping of waste is not permitted?
#3838	4.07.05 Stockpiling
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	<p>"3.06.07.06 STOCKPILING, D. MATERIALS. ""Stockpiles of dirt may be comprised only of uncontaminated dirt and naturally occurring rock."" How will it be determined that the dirt is ""uncontaminated?"" Owners/managers of stockpiles/excessive fill piles should provide the County with certified manifests (records of origins and content) from dumpers to prove that the dirt is uncontaminated and free of hazardous materials. However, a more effective way to address this issue is for the County to require ""clean earth fill"" for agricultural land stockpiling/excessive fill projects and to follow Albemarle County's definition which states that ""clean earth fill must be free of 1) any contaminants in toxic concentrations or amounts, in accordance will all applicable laws and regulations; and 2) construction debris and demolition waste, including asphalt, concrete and other materials not found in naturally occurring soils."" (On September 16, 2020, the Albemarle BOS unanimously approved 6-0 updates to the zoning ordinance that address fill dirt.) See section 3.1 of their code for definitions for clean earth fill, clean earth fill activity, inert waste fill and inert waste fill activity. Fauquier County also recently revised its ordinance earlier this year to define ""clean fill"" and ""waste fill."" It does not allow waste fill on agriculture land. Why does Loudoun County continue to permit dumping of ""waste fill"" on agriculture/rural land while its neighboring counties do not? Elimination of waste fill dumping on agriculture land will help protect our rural agricultural land and stop illegal dumps that threaten our environment and the health and safety of residents."</p>
#3837	4.07.05 Stockpiling
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	<p>"3.06.07.06 STOCKPILING, C. ACCESS/VEHICULAR CIRCULATION, 4. DEBRIS. How will this be monitored and enforced? (Currently, after years of notice to the County, the East Colonial Highway entrance of the Gable landfill is hazardous and often muddy due to runoff caused by thousands of truckloads carrying excessive fill to this site. The entrance ices up in the winter and is very hazardous during rainstorms.) In addition to keeping the streets clean, the owner of the stockpile/excessive fill project should be responsible for preventing runoff, dust and debris spreading onto adjacent properties. Should there be limits to the weight of the load carried by trucks to further protect the public?"</p>
#3836	4.07.05 Stockpiling
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.07.06 STOCKPILING. 2. b. Siting. Shouldn't prime agricultural soils and forested areas be added areas where they are not permitted?

ID	Section
#4676	4.07.05 Stockpiling
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	Staff will consider this in the TIE and JLMA-LI
#3835	4.07.05 Stockpiling
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.07.06 STOCKPILING, B. INTENSITY/CHARACTER STANDARDS, 2. SITING. Stockpiling/Excessive fill projects should not be sited at the top of the watershed. Neighboring views should not be obstructed by stockpiles/excessive fill projects. 3.06.07.06 STOCKPILING, B. INTENSITY/CHARACTER STANDARDS, 2. SITING. Can Staff Add to this section: Impacts/restrictions on properties adjacent to permanent conservation easements? What is the impact of stockpiling/excessive fill projects on conservation easements? When a stockpile/excessive fill project is located adjacent to a conservation easement, public notice, neighborhood meetings and/or special exception should be required to determine the impact on the easement."
#3834	4.07.05 Stockpiling
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.07.06 STOCKPILING, B. INTENSITY/CHARACTER STANDARDS, 1.SIZE OF USE, C. HEIGHT. Shouldn't there be a cubic yard or volume limit for stockpiles/excessive fill projects as there once was in the past? From 2010-2017, a limit of 50,000 cubic yards of fill was subject to a ""stringent review"" to determine whether ""stockpiling of dirt"" was occurring. Currently, there are no limitations or objective standards for determining if amounts needed for excessive fill projects/stockpiling are necessary or valid. Decisions are arbitrary. All applications for use of excessive fill/stockpiling should state the estimated volume for the project and there should be a set of standards that the County follows to objectively determine if the amount of fill is appropriate for the project."
#3833	4.07.05 Stockpiling
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.07.06 STOCKPILING, B. INTENSITY/CHARACTER STANDARDS, 1. SIZE OF USE. Does this section apply to excessive fill projects? 3.06.07.06 STOCKPILING, B. INTENSITY/CHARACTER STANDARDS, 1.SIZE OF USE, C. HEIGHT. How was the maximum height limit of 25 feet established? What determined this height? Note, for clean earth and inert waste fill activity, Albemarle County has a height limit of 8 feet above natural grade with no opportunity for expansion."
#3832	4.07.05 Stockpiling
By: Maura Walsh-Copeland Tags: zoc	3.06.07.06 STOCKPILING, A. APPLICABILITY. "This section applies to any stockpiling." The revised DRAFT definition is Stockpiling. The acceptance, collection, accumulation, or aggregation of dirt, fill, or gravel from off-site

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>sources, for a period of more than 12 months. Does this include asphalt? If not, are other materials that are not dirt (ie, asphalt, etc.) are regulated in some other way? Where is the regulation that applies to those materials? Does the term "utilization of excessive fill" mean stockpiling?</p>
<p>#4680</p>	<p>4.07.05 Stockpiling</p>
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021</p>	<p>staff will consider clarifying language.</p>
<p>#3831</p>	<p>4.07.05 Stockpiling</p>
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>"3.06.07.06 STOCKPILING. Title of this section is ""stockpiling."" Should it be called ""Stockpiling, Utilization of Excessive Fill""? The Loudoun County website merges these two terms as one: 'Stockpiling of Dirt/Excessive Use of Dirt as Fill.'" These terms should follow the same standards in order to prevent illegal dumps like the Gable landfill and other projects under cover as a rural economy plan. (If the Gable landfill was considered a ""stockpile"", it would not have been permitted.) If there is a difference in these two terms, they should be well-defined in terms of volume, height, siting, acreage, etc. (as outlined in ""stockpiling"") and there should be separate sections for both terms clearly spelling out their differences."</p>
<p>#3748</p>	<p>4.07.05 Stockpiling</p>
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021</p>	<p>Suggest deleting 2.a., which prohibits stockpiling in MDOD or FOD. The separate sections for MDOD and FOD should have their own sections of permitted uses, which is the place to limit what can be built in those districts. Thus 2.a. would not be needed.</p>
<p>#4682</p>	<p>4.07.05 Stockpiling</p>
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021</p>	<p>Staff supports the draft text.</p>
<p>#2984</p>	<p>4.07.05 Stockpiling</p>
<p>By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021</p>	<p>I don't understand the additional height description</p>
<p>#3618</p>	<p>4.07.05 Stockpiling</p>

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Not all existing language was copied over. Additional text added to clarify.
#3678	4.07.05 Stockpiling
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/1/2021	B.1.c...so scrutinize the last sentence relating to visibility from lot lines. I have no problem with it, but is this what is intended?
#4683	4.07.05 Stockpiling
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	noted. staff will consider clarifying text and reviewing intention.
#3545	4.07.05 Stockpiling
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:8/29/2021	I think we should include some extensive E&S provisions to permanently protect against runoff. We should also have a "quarry-esque" post operations plan for how the stockpile will be stabilized and used after the stockpiling is complete.
#3615	4.07.05 Stockpiling
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	We will follow up with B&D to see what permanent protections can be added.
#3046	4.07.05 Stockpiling
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	I did not see Stockpiling as a use in any planning area. If that's correct, why is this section needed? I suggest allowing it in some districts but requiring a SPEX.
#3617	4.07.05 Stockpiling
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Stockpiling is listed as a SPEX use in the Transition / JLMA Use Table - 3.02.02. Urban and Rural do not list stockpiling as a use.
#3901	4.07.04 Solar Facility, Commercial

ID	Section
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:9/8/2021	As solar facilities are a forward-thinking good source to harness renewable energy, I would advocate regulating them not prohibiting them.
#3747	4.07.04 Solar Facility, Commercial
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	Please delete commercial solar as a use, on the aesthetic grounds.
#4668	4.07.04 Solar Facility, Commercial
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	There are limited districts Commercial Solar Facilities are permitted in.
#3447	4.07.04 Solar Facility, Commercial
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	This should not be included. The cost of land, rapid loss of our land in western Loudoun really should take commercial scale solar off the table for us. We are not a good place for these operations. If we are going to allow private land owners to lease a portion of their land to solar contractors than we need to write detailed regulations including the exclusion of prime ag soils from these leases.
#3620	4.07.04 Solar Facility, Commercial
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Please clarify, are you suggesting it not be included as a use-specific standard OR remove it as use? Currently it is only allowed as a SPEX in: Urban - SI (Suburban Industrial/Mineral Extraction) and Transition/JLMA - TIE (Transition Industrial/Mineral Extraction) and JLMA-LI (Leesburg Industrial/Mineral Extraction).
#3044	4.07.04 Solar Facility, Commercial
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	PLEASE delete this!!
#3621	4.07.04 Solar Facility, Commercial
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Please clarify, delete use-specific standards for this use, or delete it from the use tables?

ID	Section
#9852	4.07.03 Recycling Collection Centers and Material Recovery Facilities
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	9 is another example of why neighboring property owners must be notified of applications.
#9851	4.07.03 Recycling Collection Centers and Material Recovery Facilities
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	7 needs work. How on earth do you define "responsible"? How often must litter be picked up? Put responsibility on property owner, esp since he can out-source litter control to organizations.
#9850	4.07.03 Recycling Collection Centers and Material Recovery Facilities
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	B.4. 3,000 sf is too large for a building here. Worse, as written this would allow 3,000 sf of containers! That's crazy. Suggest a max size of a single container (300 sf) and the max number of containers. (5 if site of 5 acres or less; 10 on larger sites.)
#3746	4.07.03 Recycling Collection Centers and Material Recovery Facilities
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	B.4. Is this 3,000 sf of structure or of ground area? Suggest reviewing entire ZOR text to make sure that "area" is appropriately defined.
#4666	4.07.03 Recycling Collection Centers and Material Recovery Facilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	edited for clarification
#3043	4.07.03 Recycling Collection Centers and Material Recovery Facilities
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	E.6. There is no consistency on operating hours, across many uses. Suggest handling this like parking, where there is one section on Operating Hours which are then specified for all uses where operating hours need to be stated.
#3622	4.07.03 Recycling Collection Centers and Material Recovery Facilities
By: Ryan Reed Tags: staff	noted, further staff consideration needed.

ID	Section
ryan.reed@loudoun.gov Date:9/1/2021	
#3042	4.07.03 Recycling Collection Centers and Material Recovery Facilities
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	B.4. Is the 3,000 sf for structures? Containers? Or for the lot?
#3623	4.07.03 Recycling Collection Centers and Material Recovery Facilities
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	"This area is limited to recycling containers only (which may be portable), and permanent or semi-permanent buildings or structures." Text revised for clarification.
#9849	4.07.02 Public Utilities
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	C.2. should not apply to structures that do not need /use water.
#10884	4.06.07 Sawmills
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.06.07. SAWMILLS. 2022 Round 3 Input. There are currently some operating small sawmills in Loudoun and its unlikely the neighbors even know its there. Similar to the scales of the slaughterhouses that are established in surrounding counties, the scale envisioned by the zoning ordinance is not the scale that actually is happening. If the scale is the concern, perhaps the ordinance could cap the square footage of a by right allowance for these uses, and require a special exception if it goes above that. If a building or processing site goes over 10,000 square feet or something. Alternatively, restaurants, and limited breweries are much more ""intense"" uses, at least in how many of them are established in the county already with large parking lots, buildings, traffic, etc."
#10883	4.06.07 Sawmills
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.06.07. SAWMILLS. 2022 Round 3 Input: Sawmills and similar uses. If the gauge of whether a use requires a special exception is based on the intensity, there are some uses that seem backwards. It appears that Restaurants, Commercial Wineries, and Limited Breweries are all permitted by-right. By means of contrast, nurseries, ag processing, sawmills (with three levels), and slaughterhouses all require a special exception. The special exception requirement might be a real roadblock to someone looking to offer small scale grain cleaning/milling services on their farm or saw milling services. "

ID	Section
#9848	4.06.07 Sawmills
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Start operations at 7, not 6.
#2983	4.06.07 Sawmills
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	Should there be additional standards relative to sawdust or wood chip pile? Area limit?
#3628	4.06.07 Sawmills
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	noted. When considering an area limit, should it be within the storage yard? Suggestions?
#3677	4.06.07 Sawmills
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/1/2021	My first thought is that the storage yard is not related to sawdust pile. Yet I see the value in linking them, since if you keep too much sawdust, you won't have room for raw, or sawn material storage. I actually think the storage yards may be unrealistically small and should be rethought in any case. Maybe establish 1 acre, 2 acre and 3 acres as the yard area for all materials, including sawdust. That may sound large, but space is needed for maneuvering and organizing materials, which may be 'wasteful' of area but is more efficient functionally.
#4521	4.06.07 Sawmills
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Thank you. I think those areas are a good starting point and a way to address sawdust storage. Edited.
#3544	4.06.07 Sawmills
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:8/29/2021	I believe sawmills are a horticultural accessory use. They should be classified under 3.06.08. I don't see the nexus between the use and the number of customers. The issue is not customer traffic unless they are using big trucks. Outside storage should be unlimited. Logs require space. Setbacks should only apply to new uses.
#3626	4.06.07 Sawmills

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	noted. We will consider the appropriate category. Language was carry-over from existing, we will consider different metrics for use intensity and storage yard size.
#3040	4.06.07 Sawmills
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Need operating hours
#3627	4.06.07 Sawmills
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	"3. Hours of Operation. Hours of operation are limited from 6:00 a.m. to 6:00 p.m."
#9847	4.06.06 Outdoor Storage
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	There should be a lighting standard.
#9846	4.06.06 Outdoor Storage
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	C is not needed since the Uses tables will suffice to say where outdoor storage is permitted.
#3744	4.06.06 Outdoor Storage
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	Where are types and maximum sizes of fences set out ? (ZO, FSM? General ordinances?)
#4520	4.06.06 Outdoor Storage
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Section 5.07.04

ID	Section
#3039	4.06.06 Outdoor Storage
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Buffers? Setbacks? This is the kind of use that could get out of hand, thus the performance standards need to be tough...and specific.
#3455	4.06.06 Outdoor Storage
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	Referenced screening development standards.
#3038	4.06.06 Outdoor Storage
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Minimum lot sizes? On what sort of roads should they front? Concur with Jean. Specific language on screening is set out for data centers - just copy-and-paste.
#3641	4.06.06 Outdoor Storage
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Edited and referenced development standards.
#3000	4.06.06 Outdoor Storage
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:8/21/2021	Should this be more specific? This seems open to a lot of interpretation with the "suitable and appropriate" wording. Should the fence be opaque, etc.
#3642	4.06.06 Outdoor Storage
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Edited and removed "suitable and appropriate"
#12499	4.06.05 Mini-Warehouse
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	Design standards for building lighting should be developed to regulate internal/external lights which act as lighted signage to draw attention to buildings (i.e. storage facilities). The internal lights are exceptionally visible at night from a distance as a result of the window design, bright colors and bright white lights.

ID	Section
#9845	4.06.05 Mini-Warehouse
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	C.3. Often these do have outdoor storage (which is good since that takes boats, trailers, RVs etc. away from public eyes.) Do say that mini-warehouses may have outdoor storage, but that storage is subject to the provisions of 3.06.06.06. Otherwise a mini-warehouse would have to make two applications, one for its storage units and one for any outdoor storage.
#9844	4.06.05 Mini-Warehouse
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	B Heights: These should be max heights, not mins. Delete "at least" and insert "a maximum of."
#9843	4.06.05 Mini-Warehouse
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	C.1. Units in many of these do have direct access to the outside. Delete this requirement.
#9842	4.06.05 Mini-Warehouse
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Typo in C.2.
#9841	4.06.05 Mini-Warehouse
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Mini-warehouses are perfect exampmple of why neighbors need to be notified before a zoning letter is issued.
#3037	4.06.05 Mini-Warehouse
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Minimum lot size?
#3454	4.06.05 Mini-Warehouse

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	none currently exist in 5-665, open for discussion. Staff supports draft language.
#3671	4.06.04 Flex Buildings
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/1/2021	What is the rationale for blanket the 2-story height limit in districts other than SM?
#4664	4.06.04 Flex Buildings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/5/2021	Noted. Staff will take this point under consideration. Added UE as a district that does not have the height limit, these two districts, Flex Buildings are a SPEX use. All others it is a 2-story limit
#3036	4.06.04 Flex Buildings
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Minimum lot size?
#3452	4.06.04 Flex Buildings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	No minimum currently exists in 5-608. Open to discussion. Staff supports draft language.
#3035	4.06.04 Flex Buildings
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Suggest adding the language about design and trails that are set out for data centers.
#3453	4.06.04 Flex Buildings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	noted. Staff will review data center standards and see what language can be copied over.
#6285	4.06.03 Extractive Industries

ID	Section
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021	3.06.06.03 Extractive Industries: Water and gas extraction are not listed. Does this infer that water and gas extraction for commercial sale are NOT permitted?
#9256	4.06.03 Extractive Industries
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:3/24/2022	Water and gas extraction are not identified in the definition for extractive industries. Unless otherwise determined by the zoning administrator, they would not be permitted.
#3262	4.06.03 Extractive Industries
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:8/24/2021	Why the removal of current standard in 3-1007(E)(1)(d): Where quarries are adjacent to the PD-GI or CLI district, the setback may be reduced to a minimum of 50 feet. ??
#3647	4.06.03 Extractive Industries
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	noted. we can look at why that was removed and take it under consideration.
#3034	4.06.03 Extractive Industries
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Suggest hours of operation: Not past 6:00 PM and not operated on weekends.
#3261	4.06.03 Extractive Industries
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:8/24/2021	All new applications or amendments to existing facilities currently require a SPEX, and I assume that will continue. So any circumstances which would necessitate limited hours of operation should be evaluated at that time on a case by case basis. Arbitrarily limiting hours of operation for this use is problematic
#3645	4.06.03 Extractive Industries
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	That is a good point. Staff will review hours of operation versus the legislative process.

ID	Section
#12494	4.06.02 Data Center
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	There need to be additional environmental standards including green walls and green roofs on the exterior of the buildings, with higher LID requirements.
#10882	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.06.06.02 DATA CENTER. F. Landscaping/Buffering/Screening - need for review of referred-to sections. Also, shouldn't this section include native plant percentage requirements and contiguous habitat (per Comp Plan Ch. 3 FTV Policy 4.2.A)? 3.06.06.02 DATA CENTER. F. Landscaping/Buffering/Screening - In addition to percentages of types of trees, shouldn't there be requirements for tree preservation (per Comp Plan Ch. 3 FTV Policy 4.1B? And requirement for the removal of invasive species (FTV Policy 4.1.C.) and Tree Conservation Area (FTV Policy 4.1.A)? Since this section is in lieu of referred-to Landscaping/Buffering/Screening it is important to ensure consistency between the Zoning and other requirements - such as the FSM.</p> <p>Staff Response: Referenced development standards will be reviewed."</p>
#10881	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.06.06.02 DATA CENTERS. LCEA INPUT -- E.2. Sidewalk and/or Trail Connections, F.2. Road Corridor Buffer & Plantings. The current definition of multi-use trails means pedestrian, equestrian and bicycle; Linear Parks And Trails (LPAT) is about unpaved trails which are equestrian, mountain bike (or hybrid of gravel, mtn but not necessarily road and not motorized) and pedestrian. As connecting green infrastructure corridors connecting the county, LPATs should be wide to protect the environment and usability of the corridor. Recommend at least 300' wide (500' better). Staff Response: ""Noted"""</p>
#10880	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.06.06.02.E.1.a. DATA CENTERS. Why is space for trails are not required along public roads where such facilities are not included in the Countywide Transportation Plan (CTP)? Some trail types, e.g., those under the purview of PRCS, e.g., LPAT, are separate from the CTP. Some LPAT trail concepts would be along public roads; the ZO should not make an exception to the development of those trails adopted for development by the BOS.</p> <p>Staff response: ""Noted"""</p>
#10879	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com	<p>"3.06.06.02 DATA CENTER. E. Pedestrian and Bicycle Facilities. Shouldn't this section include language to avoid exclusion of potential future segments of the Linear Parks and Trails Plan? Since this project is currently evolving and will need coordination between PRCS, DTCl, and other departments, future potential</p>

ID	Section
Date:7/9/2022	segments may not necessarily be included in the Countywide Transportation Plan. This is relevant to both #1 &2 in this section in regards to sidewalks & trails and sidewalk and/or trail connections. Also, trails for the LPAT plan may not necessarily occur along current roadways. Potential solution: adding language to include the linear parks and trails corridors identified in the LPAT Framework Plan. Staff response: ""Noted""
#10878	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.06.02. DATA CENTERS & UTILITY SUBSTATIONS. Based on concerns from neighboring residents, will the terms of Landscaping/Buffering/Screening be reviewed to address? This is especially important in sections where there is an ""in lieu of section"" in regards to buffers such as 3.06.07.08 UTILITY SUBSTATIONS and 3.06.06.02 DATA CENTER. Staff Response: Development Standards will be reviewed."
#9840	4.06.02 Data Center
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	E.1.. Requiring trials is meaningless unless it's specified where a trail can connect, or if totally within the site, state that and state the minimum length of the trail. In the latter case, a trail's length should be scaled by the acreage of a site.
#9839	4.06.02 Data Center
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Should specify max height (in feet) and address lighting.
#6284	4.06.02 Data Center
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021	3.06.06.01 Data Centers: Can there be an open space requirement for natural surface multi-user trails with connectivity to the county wide trails plan (LPAT)?
#3830	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.06.02 DATA CENTER. F. Landscaping/Buffering/Screening - need for review of referred-to sections. Also, shouldn't this section include native plant percentage requirements and contiguous habitat (per Comp Plan Ch. 3 FTV Policy 4.2.A)? 3.06.06.02 DATA CENTER. F. Landscaping/Buffering/Screening - In addition to percentages of types of trees, shouldn't there be requirements for tree preservation (per Comp Plan Ch. 3 FTV Policy 4.1B? And requirement for the removal of invasive species (FTV Policy 4.1.C.) and Tree Conservation Area (FTV Policy 4.1.A)? Since this section is in lieu of referred-to

ID	Section
	Landscaping/Buffering/Screening it is important to ensure consistency between the Zoning and other requirements - such as the FSM."
#4511	4.06.02 Data Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Referenced development standards will be reviewed.
#3829	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.06.02 DATA CENTERS. LCEA INPUT -- E.2. Sidewalk and/or Trail Connections, F.2. Road Corridor Buffer & Plantings. The current definition of multi-use trails means pedestrian, equestrian and bicycle; Linear Parks And Trails (LPAT) is about unpaved trails which are equestrian, mountain bike (or hybrid of gravel, mtn but not necessarily road and not motorized) and pedestrian. As connecting green infrastructure corridors connecting the county, LPATs should be wide to protect the environment and usability of the corridor. Recommend at least 300' wide (500' better)."
#3828	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.06.02.E.1.a. DATA CENTERS. Why is space for trails are not required along public roads where such facilities are not included in the Countywide Transportation Plan (CTP)? Some trail types, e.g., those under the purview of PRCS, e.g., LPAT, are separate from the CTP. Some LPAT trail concepts would be along public roads; the ZO should not make an exception to the development of those trails adopted for development by the BOS.
#3827	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.06.02 DATA CENTER. E. Pedestrian and Bicycle Facilities. Shouldn't this section include language to avoid exclusion of potential future segments of the Linear Parks and Trails Plan? Since this project is currently evolving and will need coordination between PRCS, DTCL, and other departments, future potential segments may not necessarily be included in the Countywide Transportation Plan. This is relevant to both #1 &2 in this section in regards to sidewalks & trails and sidewalk and/or trail connections. Also, trails for the LPAT plan may not necessarily occur along current roadways. Potential solution: adding language to include the linear parks and trails corridors identified in the LPAT Framework Plan."
#3826	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc	"3.06.06.02 DATA CENTER: Does the new Applicability standard (3.03.01.B) apply to Data Centers? If not, No reference to noise management can be found in this write up. It is recognized that a standard noise regulation like 5.12B many

ID	Section
Maura@Walsh-CopelandConsulting.com Date:9/6/2021	not be able to address the unique issues of a data center; a special set of rules for noise at data center sites is suggested. This should include addressing testing of generators and other equipment, dBA at property line, and low level sounds that carry into the surrounding area from the electronic equipment."
#4515	4.06.02 Data Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	yes.
#3825	4.06.02 Data Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.06.02. DATA CENTERS & UTILITY SUBSTATIONS. Based on concerns from neighboring residents, will the terms of Landscaping/Buffering/Screening be reviewed to address? This is especially important in sections where there is an "in lieu of section" in regards to buffers such as 3.06.07.08 UTILITY SUBSTATIONS and 3.06.06.02 DATA CENTER.
#4516	4.06.02 Data Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Development Standards will be reviewed.
#3770	4.06.02 Data Center
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:9/6/2021	F. Landscaping/buffering/Screening Data Centers should not be allowed to abut residential uses.
#3769	4.06.02 Data Center
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:9/6/2021	Noise and light pollution are problematic with these enormous facilities. Again, following with the theme of encroachment on residential communities, what standards are in place that control sound and light emissions?
#4518	4.06.02 Data Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Section 5.12

ID	Section
#3768	4.06.02 Data Center
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:9/6/2021	I recognize that height limits were already raised and echo those concerns. The county is running out of space for these facilities and there are now encroaching on residential communities. A 70ft tall structure has no business abutting anything residential. Have place types for data centers been considered?
#4519	4.06.02 Data Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	yes
#3553	4.06.02 Data Center
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/30/2021	It would seem that these standards might also want to apply in JLMA2 and UE districts as well.
#3651	4.06.02 Data Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	added all districts where Data Centers are a permitted use.
#3051	4.06.02 Data Center
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:8/23/2021	- Where substation is proposed on-site, adjacent buffering must meet requirements of Section 3.06.07.08 - Or just require Type C buffer on all sites for Data Centers - Berm slope should be revised to 3:1 to be consistent with security and maintenance standards
#3445	4.06.02 Data Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	noted. Buffering is still under staff consideration. Berm slope revised.
#3033	4.06.02 Data Center
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Where are height limits? FAR?

ID	Section
#3446	4.06.02 Data Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	Text is carry-over from 5-664 where there were no height limits or FAR. up for discussion for what it should be. Currently, staff supports draft language.
#2982	4.06.02 Data Center
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	Are the landscaping/buffering/screening requirements stricter than those found in Tables 5.07....? If so, are they stricter than any found in that section of the ordinance. Why is this information here?
#3448	4.06.02 Data Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	Staff is still working on Development Standards, 5.07, but these need to be aligned and if duplicative, removed from here.
#9838	4.06.01 Contractor
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	"Contractor" is not defined. Will Websters suffice? Screening is imperative.
#10260	4.06.01 Contractor
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/17/2022	Contractor: An establishment engaged in: The installation and servicing of items such as air conditioners, electrical equipment, flooring, heating, painting, plumbing, roofing, tiling, or ventilation, or The planting and maintenance of gardens, grounds and yards, such as landscape contractors and lawn maintenance services, or Construction and demolition services. Retail sales to the general public are not permitted except as an accessory use.
#3824	4.06.01 Contractor
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.06.01 CONTRACTOR. Although the Parking section may define number of spaces, there is no mention in Use Matrix, definition or Use Standards regarding volume or type of vans, trucks or other equipment that could be parked. In the alternative, are there Landscaping / buffering requirements that can/could apply? (Similar to Data Center "Screening of Mechanical Equipment").
#4510	4.06.01 Contractor

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Reference in 3.06.06.01.C is to Landscaping, Buffer Yards, Screening and Landscape Plans - Screening of Certain On-site Functions.
#2981	4.05.19 Schools, Public (15 or Fewer Pupils)
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	Are there any public schools this small?
#3444	4.05.19 Schools, Public (15 or Fewer Pupils)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	This is carry-over text from 5-655. Mark Holland researched existing uses in the county, I'll defer to him.
#12486	4.05.18 Schools, Public (Elementary, Middle or High)
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	J.5 Floodplain This section has sections a. and a b. which both reference section c. that is missing. It apparently references required forest cover, which is an important requirement that should be included.
#10958	4.05.18 Schools, Public (Elementary, Middle or High)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.06.05.18 SCHOOLS, PUBLIC, D. LIGHTING. How do these regulations protect dark skies, wildlife (amphibians, mammals, insects) at night, migrating birds who depend on dark sky, horticulture and agricultural crops that are light sensitive and the general welfare of residents who live next to or near athletic fields? Agriculture and horticulture crops contribute significantly to the economy in Loudoun County and artificial lights can disrupt the growth of these crops and reduce production. Artificial lights also negatively impact conservation easements as these easements protect the natural cycles of wildlife who depend on dark skies. Excessive glare and light trespass from athletic fields should be prohibited as residents have the right to enjoy one's property without intrusion from light pollution. In some cases, light curfews should be considered. Numerous definitions should be defined in the ordinance that pertain to lights, including: light pollution, light glare, light trespass, light glow, light spill over, light noise, etc."</p>
#10957	4.05.18 Schools, Public (Elementary, Middle or High)

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.18 J. 5 SCHOOLS, PUBLIC. Why was the forestation requirement for floodplains removed? 2022 Round 3 Input: The section J.5 refers to a ""c"", but there is only a and b. So again, why was c removed?"
#10956	4.05.18 Schools, Public (Elementary, Middle or High)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.18 SCHOOLS, H. NOISE. "Installation of outdoor public address systems are limited to recreational and athletic fields." Can Staff Add: "games" to the end of this sentence? Amplified sound should not be used during practices. Local residents have a right to quiet. Staff Response: We have considered the suggestion, however at this time, staff supports the draft language"
#10955	4.05.18 Schools, Public (Elementary, Middle or High)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.18 SCHOOLS, D. LIGHTING, 4. RECREATIONAL AND ATHLETIC FIELDS AND FACILITIES LIGHTING, F. "The maximum height of light poles is 80 feet." Can Staff Add: "In residential neighborhoods, the height of light poles should be negotiated with residents through community meetings to eliminate light pollution in the surrounding neighborhood." ? 3.06.05.18 SCHOOLS, D. LIGHTING, 5. HEIGHT OF FIXTURES. "The maximum height of light poles is 80 feet." Can Staff Add: "In residential neighborhoods, the height of light poles should be negotiated with residents through community meetings to eliminate light pollution in the surrounding neighborhood." ? Staff Response: Staff will rely on review by schools to determine if higher standards can be incorporated"
#10122	4.05.18 Schools, Public (Elementary, Middle or High)
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:6/3/2022	Incorrect section reference. "Landscaping/Buffering/Screening. In addition to Section 5.07.04...." Should be 5.07.03
#9837	4.05.18 Schools, Public (Elementary, Middle or High)
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	J.3., Design, at least is a start, and a standard that should be applied to most uses. However, the issue of "quality design" is large and there needs to be a major effort on this topic, post ZOR.
#9836	4.05.18 Schools, Public (Elementary, Middle or High)
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com	Lighting standards in 4. b, c and d are great and should be used as a county-wide standard for all lighting for all uses. (You can make a few exceptions, if needed.)

ID	Section
Date:4/24/2022	
#9835	4.05.18 Schools, Public (Elementary, Middle or High)
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Require lighting to be off by 10:00 PM, or if that's too soon, then 10:30. Lighting at schools' athletic facilities is a major problem for neighbors.
#3823	4.05.18 Schools, Public (Elementary, Middle or High)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.70 SCHOOLS, PUBLIC. Why was the following line deleted?: 'TRANSPORTATION. M. Archaeological Survey. A Phase I Archaeological survey shall be provided to the County in conjunctions is required with each site plan application for a Public School building.'
#4502	4.05.18 Schools, Public (Elementary, Middle or High)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	returned to text.
#3822	4.05.18 Schools, Public (Elementary, Middle or High)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.20 J. 5 SCHOOLS, PUBLIC. Why was the forestation requirement for floodplains removed?
#4503	4.05.18 Schools, Public (Elementary, Middle or High)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Under advisement per internal review.
#3821	4.05.18 Schools, Public (Elementary, Middle or High)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.20 SCHOOLS, H. NOISE. "Installation of outdoor public address systems are limited to recreational and athletic fields." Can Staff Add: "games" to the end of this sentence? Amplified sound should not be used during practices. Local residents have a right to quiet. "
#4504	4.05.18 Schools, Public (Elementary, Middle or High)

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	We have considered the suggestion, however at this time, staff supports the draft language.
#3820	4.05.18 Schools, Public (Elementary, Middle or High)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.20 SCHOOLS, D. LIGHTING, 4. RECREATIONAL AND ATHLETIC FIELDS AND FACILITIES LIGHTING, F. "The maximum height of light poles is 80 feet." Can Staff Add: "In residential neighborhoods, the height of light poles should be negotiated with residents through community meetings to eliminate light pollution in the surrounding neighborhood." ? 3.06.05.20 SCHOOLS, D. LIGHTING, 5. HEIGHT OF FIXTURES. "The maximum height of light poles is 80 feet." Can Staff Add: "In residential neighborhoods, the height of light poles should be negotiated with residents through community meetings to eliminate light pollution in the surrounding neighborhood." ? "
#4506	4.05.18 Schools, Public (Elementary, Middle or High)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Staff will rely on review by schools to determine if higher standards can be incorporated.
#3819	4.05.18 Schools, Public (Elementary, Middle or High)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.20 SCHOOLS, D. LIGHTING, 4. RECREATIONAL AND ATHLETIC FIELDS AND FACILITIES LIGHTING When athletic fields are located in residential neighborhoods, lights should be turned off earlier than 11 pm. Can the turn-off time be discussed and negotiated with the neighborhood, (as an 11 pm turn off time may interfere with sleep and work habits of residences)?"
#4507	4.05.18 Schools, Public (Elementary, Middle or High)
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Staff will rely on review by schools to determine if higher standards can be incorporated.
#3818	4.05.18 Schools, Public (Elementary, Middle or High)
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.20 SCHOOLS, PUBLIC, D. LIGHTING. How do these regulations protect dark skies, wildlife (amphibians, mammals, insects) at night, migrating birds who depend on dark sky, horticulture and agricultural crops that are light sensitive and the general welfare of residents who live next to or near athletic fields? Agriculture and horticulture crops contribute significantly to the economy in Loudoun County and artificial lights can disrupt the growth of these crops and reduce production. Artificial lights also negatively impact conservation easements as these easements protect the natural cycles of wildlife who depend

ID	Section
	<p>on dark skies. Excessive glare and light trespass from athletic fields should be prohibited as residents have the right to enjoy one's property without intrusion from light pollution. In some cases, light curfews should be considered. Numerous definitions should be defined in the ordinance that pertain to lights, including: light pollution, light glare, light trespass, light glow, light spill over, light noise, etc."</p>
#3767	4.05.18 Schools, Public (Elementary, Middle or High)
<p>By: Jean Ault Tags: zoc jean.ault@gmail.com Date:9/6/2021</p>	<p>I understand that the lighting section is carried over from the '93 ZO, however, I find the headings for the Lighting section a bit clunky. B. 1. "Light Fixtures" is ok because it does describe what type of light fixtures are desired - shielded and downward facing. B.2. might better be labeled: "Illumination" and include the description that Exterior Lighting is 5 foot candles, with the exception of "Parking Lot" which is 2 foot candles.</p>
#2980	4.05.18 Schools, Public (Elementary, Middle or High)
<p>By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021</p>	<p>Does site design belong in the FSM and not here?</p>
#3439	4.05.18 Schools, Public (Elementary, Middle or High)
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021</p>	<p>After review and consideration, staff agrees. Language will not be removed until the FSM is being revised as part of this process.</p>
#2979	4.05.18 Schools, Public (Elementary, Middle or High)
<p>By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021</p>	<p>Setbacks seem backward. I'd expect more separation from residential uses to buffer the residences. Not so important for commercial uses.</p>
#3440	4.05.18 Schools, Public (Elementary, Middle or High)
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021</p>	<p>Carry-over from 5-666(G). Can be reconsidered. Agreed. Revised as suggested.</p>
#2978	4.05.18 Schools, Public (Elementary, Middle or High)

ID	Section
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	If bicycle parking is relaxed in 5.05.04 for any reason, it could result in inadequate bicycle parking at school sites...Perhaps schools have their own special parking requirements.
#10954	4.05.17 Rural Retreat
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.17 RURAL RETREAT. 14. Avg. Daily User and Acreage Ratio. 100 users/50 ac. How will ""No more than 450 users are allowed on greater than 200 acres"" be enforced? Is the ""Statement of Use"" meant to be enforcement only after a ""complaint"" is received? [If so, kinda late] Staff response: Zoning Enforcement is complaints-based."
#10877	4.05.17 Rural Retreat
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.17.C.14 RURAL RETREAT. AVERAGE DAILY USER AND ACREAGE RATIO. If this venue is located off of a 2-lane state-maintained road, the # of users/day could easily overwhelm other necessary travelers, such as local residents, First Responders, and Law Enforcement. Could this entity be prohibited in MDODs? 2022 Round 3 Input: Due to the scale and intensity of patrons, events, and parking this should not be a permitted use on land zoned MDOD in ARN and ARS."
#10876	4.05.17 Rural Retreat
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.05.17 Rural Retreats and 3.06.06.02 Data Centers should incorporate the LPAT system of park space, with multi-use public trails woven into all open space easements.
#9834	4.05.17 Rural Retreat
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Rural retreats could be a loophole category for promoters, and thus should require a SPEX. A specific concern is the wide-open "recreation" use. This needs to be limited to swimming pools, tennis courts (with a cap on the number,) fishing, and perhaps archery and equestrian. [See how requiring a SPEX means that you don't need that detail?]
#6283	4.05.17 Rural Retreat
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021	3.06.05.19 Rural Retreat: Can there be an open space requirement for natural surface multi-user trails with connectivity to the county wide trails plan (LPAT)?

ID	Section
#3817	4.05.17 Rural Retreat
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.19.C.14 RURAL RETREAT. AVERAGE DAILY USER AND ACREAGE RATIO. If this venue is located off of a 2-lane state-maintained road, the # of users/day could easily overwhelm other necessary travelers, such as local residents, First Responders, and Law Enforcement. Could this entity be prohibited in MDODs? 3.06.05.19.E RURAL RETREAT. SKETCHES, SITE PLANS, SPECIAL EXCEPTIONS AND STATEMENT OF USE. BRMCA: It seems it would be to the benefit to Zoning and Planning to require a site plan, complete with septic, well, phone access, parking, driveways, lighting, etc, rather than a sketch plan, in order to make expectations clearer from the beginning.
#4491	4.05.17 Rural Retreat
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	sketch plan removed.
#3816	4.05.17 Rural Retreat
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.19 RURAL RETREAT: Can/will a requirement be included to provide public multi-use trails that could link to Linear Parks and Trails?
#3815	4.05.17 Rural Retreat
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.19 RURAL RETREAT. 3. Frontage/Access. Missed deletion of ""Corporate."" 12. ""Adaptive Reuse. Incorporating restored structures to preserve rural character is encouraged."" Change to state, ""Incorporating historic structures following the guidelines of the Secretary of the Interior (NPS) for preservation projects to preserve rural character is encouraged.""
#4493	4.05.17 Rural Retreat
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	referenced Section 5.09 - Adaptive Reuse.
#3814	4.05.17 Rural Retreat
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.19 RURAL RETREAT. 14. Avg. Daily User and Acreage Ratio. 100 users/50 ac. How will "No more than 450 users are allowed on greater than 200 acres" be enforced? Is the "Statement of Use" meant to be enforcement only after a "complaint" is received? [If so, kinda late?]

ID	Section
#4494	4.05.17 Rural Retreat
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Zoning Enforcement is complaints-based.
#3813	4.05.17 Rural Retreat
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.19 RURAL RETREAT. This Use (as Sec. 5-619) has been INCONSISTENT with other similar Uses by excluding ""Hours of Operation."" With similar regulations for size, food service, special events, recreation and large average daily users--Hours of Operation should be included to be consistent with similar uses. Suggest: 7am (deliveries only) to 12 midnight. If Events are held, then Scale Levels for attendees should be added to be consistent with similar intensity uses (see Rural Use Zoning Comparison Matrix)."
#4495	4.05.17 Rural Retreat
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	hours of operation added
#3812	4.05.17 Rural Retreat
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.19 RURAL RETREAT. Although draft includes DEVELOPMENT criteria, regulations for this use are INCONSISTENT with other similar uses in the provision for health, safety and welfare AFTER development DURING Use (e.g., Event facilities, high-volume tourism venues). For CONSISTENCY, regulations should be included that identify 1) Yard standards, 2) Landscaping/buffering/screening, 3) Road access and heavy equipment, 4) Exterior lighting, 5) NOISE, 6) Hours of Operation. Does the new Applicability section 3.06.01.B take care of this?
#4496	4.05.17 Rural Retreat
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	yes.
#3032	4.05.17 Rural Retreat
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Strongly suggest requiring a SPEX for all rural retreats!! And why is this even here? Are there rural retreats in the county now?

ID	Section
#4497	4.05.17 Rural Retreat
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	noted.
#3031	4.05.17 Rural Retreat
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Shouldn't C.4. be the FAR of the aggregate of all structures on the site?
#4498	4.05.17 Rural Retreat
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	"Floor Area Ratio (FAR): A number or percentage, derived by dividing the gross floor area of the buildings on any lot by the lot area. The floor area ratio multiplied by the lot area produces the maximum amount of floor area that may be constructed on such lot."
#3029	4.05.17 Rural Retreat
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	C 3 speaks of "rural corporate retreats," while the section is about "rural retreats."
#4499	4.05.17 Rural Retreat
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	deleted. thank you.
#2977	4.05.17 Rural Retreat
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	Why do the Performance Standards need to reference hazardous materials? I have not noted that elsewhere for other uses that might be much more likely to handle hazardous materials, or other similar uses that are just as unlikely to handle them.
#4500	4.05.17 Rural Retreat
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	agreed, deleted.

ID	Section
#2976	4.05.17 Rural Retreat
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	I do not find a definition for this use. Is it the same as Rural Resort?
#4501	4.05.17 Rural Retreat
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	Rural Resort/Rural Retreat: A private establishment consisting of a detached structure or structures located in a rural setting in which lodging units are offered to transients for compensation as the principal use, along with conference and meeting facilities, restaurant and banquet facilities, and recreational amenities.
#10953	4.05.16 Recreation
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.16 RECREATION: This use section should be expanded to address all issues addressed in other similar uses. Why are there are no setback rules established, no minimum acreage, etc.? 2022 Round 3 Input: Requirements for scale of intensity should be applied to be consistent with other similar public/civic/institutional uses (e.g., acres, setbacks, road access, etc.)"
#10952	4.05.16 Recreation
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.16 RECREATION. There is an Intensity maximum for INDOOR Rec. of 10K sqft in Urban districts. Why is there NO Maximum at all for SPA, TPA or RPA? 2022 Round 3 Input: Recreation Indoor should have CONSISTENT sq ft requirements in all districts where it is permitted."
#9833	4.05.16 Recreation
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Since these require APEX I will make only one comment: Shouldn't three stories be the Maximum height, not the minimum?
#3811	4.05.16 Recreation
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.18 RECREATION. There is an Intensity maximum for INDOOR Rec. of 10K sqft in Urban districts. Why is there NO Maximum at all for SPA, TPA or RPA? 3.06.05.18 RECREATION: This use section should be expanded to address all issues addressed in other similar uses. Why are there are no setback rules established, no minimum acreage, etc.?

ID	Section
#4489	4.05.16 Recreation
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	noted.
#3668	4.05.16 Recreation
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/1/2021	Clarify that B. 1 & 2 apply only to UT, UM, & UE districts. It could be worded better.
#4490	4.05.16 Recreation
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021	text revised.
#3028	4.05.16 Recreation
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Why should the building be at least three stories? The county already has businesses like an indoor go-kart track that are in single-story buildings.
#3438	4.05.16 Recreation
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	This standard applies only in UT, UM and UE districts where multi-level uses and structures are encouraged.
#10951	4.05.15 Public Safety Uses
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.05.15 PUBLIC SAFETY USES: Each of the uses (fire house, police station) call for a minimum lot size of 2 acres, which is appropriate within Historic Villages. It may be appropriate have a different minimum outside of Villages. To be addressed during Overlay Districts with reference to Villages before detailed plans are initiated.
#10950	4.05.15 Public Safety Uses
By: Maura Walsh-Copeland Tags: zoc	"3.06.05.15. PUBLIC SAFETY USES. This section includes Fire & Rescue and Police Station or Substation. The DRAFT Use Matrix indicates this use is P/S,

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>indicating permitted in some locations and SPEX is other, however, the Use Standards do not indicate WHEN it is Permitted vs. SPEX (criteria). Was this omitted? Staff Response: This was carry-over language that did not specify the distinction. Staff will work on additional language to clarify 2022 Round 3 Input: This use is still indicated as ""P/S"" in ARN and ARS. Either describe what moves this use from Permitted to SPEX, or make it CONSISTENT with other locations by being SPEX only."</p>
#3810	4.05.15 Public Safety Uses
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>3.06.05.17 PUBLIC SAFETY USES: Each of the uses (fire house, police station) call for a minimum lot size of 2 acres, which is appropriate within Historic Villages. It may be appropriate have a different minimum outside of Villages. To be addressed during Overlay Districts with reference to Villages before detailed plans are initiated.</p>
#3809	4.05.15 Public Safety Uses
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>3.06.05.17. PUBLIC SAFETY USES. This section includes Fire & Rescue and Police Station or Substation. The DRAFT Use Matrix indicates this use is P/S, indicating permitted in some locations and SPEX is other, however, the Use Standards do not indicate WHEN it is Permitted vs. SPEX (criteria). Was this omitted?</p>
#4488	4.05.15 Public Safety Uses
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:10/1/2021</p>	<p>This was carry-over language that did not specify the distinction. Staff will work on additional language to clarify.</p>
#3026	4.05.15 Public Safety Uses
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021</p>	<p>FAR of 0.3 seems too small</p>
#3437	4.05.15 Public Safety Uses
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021</p>	<p>Carry-over text from 5-638. Can be reconsidered.</p>

ID	Section
#3765	4.05.13 Hospitals
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:9/5/2021	This regulations are the same as '93 ZO. Should there be any updates? Is the number of 100 inpatients still valid for public sewer/water?
#9832	4.05.12 Health and Fitness Centers
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Re bike parking: Isn't this handled in the parking matrix? (My preference is to leave this out and let the market decide.)
#9831	4.05.12 Health and Fitness Centers
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Health & Fitness: Insert "therapeutic" before "massages" and do the same in the definitions. Would hate to see this used as a loopholes for "happy endings."
#3764	4.05.12 Health and Fitness Centers
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:9/5/2021	I am not sure I see the point on over-regulating spa services such as massage at a Health & Fitness Center.
#4395	4.05.12 Health and Fitness Centers
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Staff will follow up. It is likely that we want a clear distinction between a Health and Fitness Center and a business dedicated to massage therapy.
#3596	4.05.12 Health and Fitness Centers
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/1/2021	Apparently the zoning and police violations was a massage trailer set up in an industrial park at the quarry. The standards here sound like they are responding to a single incident. Otherwise they don't make sense.
#4396	4.05.12 Health and Fitness Centers
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	This was located in the definitions of the existing ordinance.

ID	Section
#3528	4.05.12 Health and Fitness Centers
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/29/2021	Confused by C.2. Location. Does this intend to be a preference for location in a Quarry Notification Overlay or not? Even so, why? Is this specific to this use? What is the nexus between Quarry Overlay Districts and this use?
#4397	4.05.12 Health and Fitness Centers
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Deleted C.2 - Location.
#9882	4.05.11 Golf Course
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:4/25/2022	Golf course and major recreation uses are permitted only by sp[ecial] exception. Suggest that negates the value of the standards in this section. To me the goal of the use standards is to avoid a case by case, legislative review.
#3527	4.05.11 Golf Course
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/29/2021	Similar to my last comment, are there any features relative to sizes of structures or facilities that need to be Use-Specific Standards? Yet there seems to nothing about the environmental hazards that golf courses create relative to run-off of fertilizers, etc.
#3763	4.05.11 Golf Course
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:9/5/2021	I agree with Kevin here. The size requirements will likely take care of themselves; however, we could use some standards to protect our waterways from fertilizer/chemical run-off.
#4392	4.05.11 Golf Course
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Added language from the LOD requiring a Nutrient Management Plan to promote appropriate application of fertilizer and chemicals as well as BMPs.
#3526	4.05.11 Golf Course
By: Kevin Ruedisueli Tags: zoc	I note that the required minimum sizes are in line with what would normally be the case for golf course, so why put the site size here at all?

ID	Section
kevinruedisueliZOC@gmail.com Date:8/29/2021	
#3025	4.05.11 Golf Course
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Golf clubs are almost synonymous with country clubs. Perhaps the sections can be merged. If not, suggest putting them next to each other in the document.
#3436	4.05.11 Golf Course
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	noted. The list is alphabetical. Staff is considering a merge.
#3024	4.05.11 Golf Course
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Suggest forbidding sand traps.
#4394	4.05.11 Golf Course
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Agree on a personal level.
#10949	4.05.10 Farm Based Tourism
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.06.05.10.B2 FARM BASED TOURISM: Can you review the chart in this section that shows visitors per day by acreage size? The line entitled Level I 150 vehicles and 300 people for a lot of 5 acres to 40 acres. Clearly, on smaller acreage lots (size 5 - 10 acres) this would overwhelm the lot. Can you add a line for smaller acreage areas and state a limit of 75 vehicles and 100 people? This would avoid overwhelming the lot. Recommend: -- 5-10 acres = 100 visitors per day and 50 vehicles at one time; -- 11-20 acres = 200 visitors per day and 100 vehicles at one time; -- 21-39 acres = 300 visitors per day and 150 vehicles at one time. -- Special events may be conducted beyond these numbers 5 times per year with special permit required (Spring & Fall Farm Tour constitutes a Special Event). 3.06.05.10. FARM BASED TOURISM. B. Intensity 2. Visitors/Customers/Parking Spaces. The ""math"" could be used for parking space calculation, but how would/could the quantity of visitors, customers or cars allowed on site at any one time be approved OR enforced?"</p>

ID	Section
#9830	4.05.10 Farm Based Tourism
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Even small-scale farm tourism allows a LOT of people on site. For this reason it should not be permitted on Rural Economy lots in cluster subdivisions.
#6282	4.05.10 Farm Based Tourism
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021	3.06.05.11 Farm based tourism: Matrix intensity is high and should align with similar uses.
#3807	4.05.10 Farm Based Tourism
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.11.B2 FARM BASED TOURISM: Can you review the chart in this section that shows visitors per day by acreage size? The line entitled Level I 150 vehicles and 300 people for a lot of 5 acres to 40 acres. Clearly, on smaller acreage lots (size 5 - 10 acres) this would overwhelm the lot. Can you add a line for smaller acreage areas and state a limit of 75 vehicles and 100 people? This would avoid overwhelming the lot. Recommend: -- 5-10 acres = 100 visitors per day and 50 vehicles at one time; -- 11-20 acres = 200 visitors per day and 100 vehicles at one time; -- 21-39 acres = 300 visitors per day and 150 vehicles at one time. -- Special events may be conducted beyond these numbers 5 times per year with special permit required (Spring & Fall Farm Tour constitutes a Special Event)."
#4383	4.05.10 Farm Based Tourism
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	noted
#3806	4.05.10 Farm Based Tourism
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.11. FARM BASED TOURISM. B. Intensity 2. Visitors/Customers/Parking Spaces. The ""math"" could be used for parking space calculation, but how would/could the quantity of visitors, customers or cars allowed on site at any one time be approved OR enforced?"
#4384	4.05.10 Farm Based Tourism
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	noted. Zoning Enforcement will review proposed text.

ID	Section
#3442	4.05.10 Farm Based Tourism
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	For level 2 and 3 operations the hours of 6pm for closure is too early. Summer evening hours are prime visiting for families. I suggest 9pm for the months of May through September for a closing time.
#3762	4.05.10 Farm Based Tourism
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:9/5/2021	I agree that the 6pm closing time is too limiting. Eco-tourism is allowed until 9pm, I believe.
#4385	4.05.10 Farm Based Tourism
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	edited to 9PM
#3658	4.05.10 Farm Based Tourism
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/1/2021	Existing farm structures which cannot meet setbacks or other standards should be considered non-conforming, but allowed to be used for this purpose provided public safety is managed.
#4386	4.05.10 Farm Based Tourism
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	This will be addressed in the Adaptive Reuse Section 5.09
#3594	4.05.10 Farm Based Tourism
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/1/2021	Farm based tourism sounds like guest farms, country inns, farm markets...etc. Its more of an industry than a zoning use.
#3443	4.05.10 Farm Based Tourism
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	Many of our older farms are being given new life with some portion in use for farm based tourism. There should be exceptions for existing barns/structures from the set back requirements.

ID	Section
#4388	4.05.10 Farm Based Tourism
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	This will be addressed in the Section 5.09, Adaptive Reuse.
#3023	4.05.10 Farm Based Tourism
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Given that 300 visitors per day is considered "small scale," I suggest a 10-acre minimum lot.
#3434	4.05.10 Farm Based Tourism
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	Definition: Farm based tourism: Tourism events which focus on visitation of farms, including organized farm tours and participatory farm vacations. Increasing acreage could effect Loudoun Farms Tour, where high-intensity producers that sit on less than 10 acres are visited twice a year.
#9829	4.05.09 Fairground
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Note on roads for fairgrounds: The County fair is on Dry Mill Rd., and the narrow and twisty character of that road are sometimes a problem. Thus site any new fairground on a larger road.
#9828	4.05.09 Fairground
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	D.2. Fairgrounds should be on arterial or major collector roads.
#3022	4.05.09 Fairground
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Suggest requiring a SPEX.
#3021	4.05.09 Fairground

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	I'm confused here as well since I did not see Fairgrounds in any USE table. There is already a fairground in the county so Fairground should be included in the USE table.
#3433	4.05.09 Fairground
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	agreed, we will need to align with the use tables. for reference, the definition is: Fairground: A parcel or tract of land used as the site of any fair, exposition or public display.
#3794	4.05.08 Death Care Services
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.06.A CEMETERY, MAUSOLEUM, CREMATORIUM, MEMORIAL PARK. APPLICABILITY. Does not address where these are allowed. Could these entities be excluded in MDODs?
#4367	4.05.08 Death Care Services
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	These uses are subject to a SPEX in ARN & ARS. Therefore, though not excluded from MDOD, subject to public process.
#3793	4.05.08 Death Care Services
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.06. CEMETERY, MAUSOLEUM, CREMATORIUM, MEMORIAL PARK. This section title does not match the currently posted DRAFT Use Matrix for "Death Care Services." That list does not include "Memorial Park" (instead has Funeral Services). Will updates be made to the Use Matrix and definitions to match?
#4368	4.05.08 Death Care Services
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Changed title to match use table category. Removed undefined memorial park and replaced with funeral services. Funeral services, while also undefined, occurs in the use table. Staff will continue to consider whether memorial park and/or funeral services need defined and a use-specific standard.
#3592	4.05.08 Death Care Services
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/1/2021	What is the reason for the huge setbacks? This is not a noisy use. I could see setbacks from wells, maybe but not from residences or other uses. I thought the state regulated cemeteries? Leesburg has a crematorium in Town.

ID	Section
#3654	4.05.08 Death Care Services
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Setbacks edited and units standardized.
#3014	4.05.08 Death Care Services
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Setbacks from individual wells are important.
#3415	4.05.08 Death Care Services
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	noted. This use will also require a health department permit, VDH considers cemetery a pollution source: https://law.lis.virginia.gov/admincode/title12/agency5/chapter630/section380/
#3013	4.05.08 Death Care Services
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	FAR doesn't apply to a cemetery. Also, should the cemetery be limited to a certain amount of the parcel, or will setbacks achieve the same purpose?
#3416	4.05.08 Death Care Services
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	FAR would apply to any structures that are part of the cemetery use. Staff believes the setbacks achieve the purpose.
#2973	4.05.08 Death Care Services
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	Setbacks seem extreme for all but maybe the Crematorium use.
#3417	4.05.08 Death Care Services
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	Setback distances are carry-over from 5-637, but can be reconsidered. Setbacks edited and units standardized.

ID	Section
#10875	4.05.07 Country Club
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.07 COUNTRY CLUB. C.3. Use Limitations. The language ""Siting on primary ridgelines or hilltops, if visible from the adjacent public roadways is prohibited"" is appropriate and should not be modifiable. Statement about modifications due to engineering constraints should be removed. Staff Response: Staff will continue to consider revision. The term ridgeline is currently being contemplated in the MDOD, and standardized terms must be used 2022 Round 3 Input: There be regulations to ensure there are NO exceptions to construction on a ridge line to be in compliance with the 2019 Comp Plan."
#10874	4.05.07 Country Club
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.07.A: COUNTRY CLUB. APPLICABILITY. Could this entity be prohibited in MDODs? Staff Response: Staff will consider appropriate use-table designation for Country Club 2022 Round 3 Input: Due to the size of structures, visitors and parking allowed this should not be a permitted use on land zoned MDOD in ARN and ARS."
#9827	4.05.07 Country Club
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Say that Country Clubs must be on arterial or major collector roads.
#9826	4.05.07 Country Club
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	DO not siting on ridgelines even if that makes engineering sense.
#9825	4.05.07 Country Club
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	The facilities of country clubs should be only for members and guests, and specifically not for the general public.
#9824	4.05.07 Country Club
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	The distribution of uses is fine as long as pro shops, admin offices, etc. amount to 30% of the total area.

ID	Section
#9823	4.05.07 Country Club
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	The allowed principal structures are 2 or 3 times too large.
#9822	4.05.07 Country Club
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Country Clubs should require a SPEX. However, I don't see them in the Uses tables.
#3802	4.05.07 Country Club
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.08.D.1 COUNTRY CLUB: The minimum setback should be 150 feet from property line to allow for buffering of neighboring properties 3.06.05.08.J COUNTRY CLUB: Apply Section 5.12B if similar to old section 5.652B."
#4372	4.05.07 Country Club
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Revised to 150 feet to align with conference and training facilities.
#3801	4.05.07 Country Club
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.08 COUNTRY CLUB. H.2. Parking. Why was the "where not practicable" section of parking surface removed? Possible solution, remove "where practicable" from remaining text, so it simply states: "A pervious surface is required."
#4373	4.05.07 Country Club
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	The phrase "a dust-free surfacing material shall be provided in accordance with the requirements of the Facilities Standards Manual" was removed from all language.
#3800	4.05.07 Country Club

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.08.D.3 COUNTRY CLUB. DRIVEWAYS. Allowing a driveway to exceed a stated buffer zone negates the purpose of a buffer; vehicles bring noise, trash, exhaust, and headlights, which can be disruptive to adjacent private residences.
#4374	4.05.07 Country Club
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Edited.
#3799	4.05.07 Country Club
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.08 COUNTRY CLUB. C.3. Use Limitations. The language "Siting on primary ridgelines or hilltops, if visible from the adjacent public roadways is prohibited" is appropriate and should not be modifiable. Statement about modifications due to engineering constraints should be removed. Can there be regulations to ensure there are NO exceptions to construction on a ridge line?
#4375	4.05.07 Country Club
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Staff will continue to consider revision. The term ridgeline is currently being contemplated in the MDOD, and standardized terms must be used.
#3798	4.05.07 Country Club
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.08.A: COUNTRY CLUB. APPLICABILITY. Could this entity be prohibited in MDODs?
#4376	4.05.07 Country Club
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Staff will consider appropriate use-table designation for Country Club.
#3649	4.05.07 Country Club
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/1/2021	C. 3. The notion that if the building does not impact view from an 'adjacent' roadway, there is no impact is flawed. Frequently an adjacent roadway may be lined with trees or other features obscuring a building while the building may be clearly viewed from farther away and have a large impact on a scenic ridge.

ID	Section
#3655	4.05.07 Country Club
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	noted. we can revisit. the proposed ridgeline setbacks may also address some of this, but staff will consider other criteria
#3019	4.05.07 Country Club
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Design standard #3 speaks to ridgelines and hilltops. These are specific elevations and what we really want is to forbid development on or within a certain number of feet to the APPARENT ridgeline. While this seems like semantics, AT& has suggested that t might use this distinction to put a large tower on Short hill Mountain since the current ZO speaks to "ridgelines" and it could put the tower just a few feet off the technical ridgeline.
#3424	4.05.07 Country Club
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	Table this thought, text in Overlay Districts is proposed to address ridgeline protection of the mountainsides. This section will need to either align with that, or have these terms defined if not within the mountainside. Also, this is carry-over existing text from 5-660(C).
#3018	4.05.07 Country Club
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Design standards #1 and #3 may be difficult to enforce since they are subjective. Can you create objective standards?
#3425	4.05.07 Country Club
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	Agreed. This is carry-over text that, if these ideas are necessary, need improvement.
#3017	4.05.07 Country Club
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Glad a SPEX is required. Perhaps divide the standards into parts for golf course, tennis courts (where lighting is a problem,) and for a swimming pool. Include support facilities as appropriate. The do a separate section for the clubhouse.
#3426	4.05.07 Country Club
By: Ryan Reed Tags: staff	noted

ID	Section
ryan.reed@loudoun.gov Date:8/25/2021	
#2974	4.05.07 Country Club
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	For this use, compared to others, the setbacks for structures seems quite small. Why so lenient with this use? Or maybe be more lenient with others.
#3429	4.05.07 Country Club
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	carry-over text. can be revisited to make comparable to like-intensity uses. Setback revised to 150 to match similar uses.
#10948	4.05.06 Conference and Training Centers
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.06.05.06 (C).7 CONFERENCE AND TRAINING CENTERS. OPEN SPACE. If allowed in MDODs, "open space" could be misinterpreted to whole sale clearing of forest. When considering the additional allowances stated for parking, storage, accessory buildings...clearing could be larger than what was intended. In the Draft Section related to Rural Retreats the terminology: "must be kept in an agricultural, forestry, open space, and/or historic preservation use." This keeps the intention tied to the specific land type proposed for clearing/construction. Staff Response: Agreed. Language edited here and in 3.06.03.01. 2022 Round 3 Input: Due to the size of structures, visitors and parking allowed this should not be a permitted use on land zoned MDOD in ARN and ARS."</p>
#10947	4.05.06 Conference and Training Centers
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.06.05.06. CONFERENCE AND TRAINING CENTERS. The current application of this ""Use"" for a drone facility demonstrates the standards for this use are inadequate to protect the health, safety and welfare of area residents. The Use definition describes a training facility as one or more buildings ""engaged in business, technical or professional training, conferences, seminars, and/or certification, "" not what the Washington Business Journal describes as ""facilities that include a 500-by-50-foot runway for UAV flight, 30 acres of flyover space, mobile takeoff spots for drones, an outdoor covered pavilion for the ability to hold trainings and conferences, drone net enclosures and possibly an indoor flight barn."" With this type of application/facility the larger setbacks are required, hours of operation, DETAILED review of Section 3.05 (not yet provided). See ZOR-2021 INTENSITY SORT-RuralZoningComparison. https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-INTENSITY-SORT-RuralZoningComparison.pdf Staff Response: This use requires a SPEX in the districts set forth in A. Staff believes that review and conditions of the SPEX process can account for unique considerations of a drone-training facility"</p>

ID	Section
#10946	4.05.06 Conference and Training Centers
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.06. CONFERENCE AND TRAINING CENTERS. This section needs language and regulation clean-up, as the use standards do not match the new definitions or use matrix. A. Applicability says the section applies to ""convention or exhibition facilities"" and crosses out the word ""conference"" -- which is the title of the section. Section refers to ""training center,"" but the definitions section describes ""training facility."" So the title and terms are conflicting/confusing. Was the title supposed to have been changed? Staff response: Agreed and thank you. Edits made to the use table and this section to correspond to the defined term 2022 Round 3 Input: There is still a mismatch of the term ""Training Center"" versus ""Training Facility"" between the Table of Contents link for Use Specific Standards, the detail and the listing in the Use Tables. "
#10873	4.05.06 Conference and Training Centers
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.06.B CONFERENCE AND TRAINING CENTERS. INTENSITY/ CHARACTER. How would one confirm compliance with the number of daily allotted visitors? These should be excluded in MDODs. 2022 Round 3 Input: Due to the size of structures, visitors and parking allowed this should not be a permitted use on land zoned MDOD in ARN and ARS."
#3797	4.05.06 Conference and Training Centers
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.07.B CONFERENCE AND TRAINING CENTERS. INTENSITY/CHARACTER. How would one confirm compliance with the number of daily allotted visitors? These should be excluded in MDODs. 3.06.05.07 (C).7 CONFERENCE AND TRAINING CENTERS. OPEN SPACE. If allowed in MDODs, "open space" could be misinterpreted to whole sale clearing of forest. When considering the additional allowances stated for parking, storage, accessory buildings...clearing could be larger than what was intended. In the Draft Section related to Rural Retreats the terminology: "must be kept in an agricultural, forestry, open space, and/or historic preservation use." This keeps the intention tied to the specific land type proposed for clearing/construction.
#4369	4.05.06 Conference and Training Centers
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Agreed. Language edited here and in 3.06.03.01.
#3796	4.05.06 Conference and Training Centers
By: Maura Walsh-Copeland Tags: zoc	"3.06.05.07. CONFERENCE AND TRAINING CENTERS. The current application of this ""Use"" for a drone facility demonstrates the standards for this use are

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>inadequate to protect the health, safety and welfare of area residents. The Use definition describes a training facility as one or more buildings ""engaged in business, technical or professional training, conferences, seminars, and/or certification, "" not what the Washington Business Journal describes as ""facilities that include a 500-by-50-foot runway for UAV flight, 30 acres of flyover space, mobile takeoff spots for drones, an outdoor covered pavilion for the ability to hold trainings and conferences, drone net enclosures and possibly an indoor flight barn."" With this type of application/facility the larger setbacks are required, hours of operation, DETAILED review of Section 3.05 (not yet provided). See ZOR-2021 INTENSITY SORT-RuralZoningComparison. https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-INTENSITY-SORT-RuralZoningComparison.pdf</p>
#4370	4.05.06 Conference and Training Centers
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021</p>	<p>This use requires a SPEX in the districts set forth in A. Staff believes that review and conditions of the SPEX process can account for unique considerations of a drone-training facility.</p>
#3795	4.05.06 Conference and Training Centers
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>"3.06.05.07. CONFERENCE AND TRAINING CENTERS. This section needs language and regulation clean-up, as the use standards do not match the new definitions or use matrix. A. Applicability says the section applies to ""convention or exhibition facilities"" and crosses out the word ""conference"" -- which is the title of the section. Section refers to ""training center,"" but the definitions section describes ""training facility."" So the title and terms are conflicting/confusing. Was the title supposed to have been changed?"</p>
#4371	4.05.06 Conference and Training Centers
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021</p>	<p>Agreed and thank you. Edits made to the use table and this section to correspond to the defined terms.</p>
#3016	4.05.06 Conference and Training Centers
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021</p>	<p>The earlier Use table specifies SPEX for training facilities. The table here requires a SPEX only for large-scale projects. These categories could lead to projects that really don't fit into ARN or ARS. Very important to require a SPEX for any of these uses, regardless of size.</p>
#3422	4.05.06 Conference and Training Centers
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021</p>	<p>A SPEX is required in ARN & ARS. Applicability has been revised to align with use tables.</p>

ID	Section
#3015	4.05.06 Conference and Training Centers
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	The Use table I see speaks of a "training facility" and I did not see a "conference center." Consistency is important...and helpful.
#3423	4.05.06 Conference and Training Centers
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	agreed. Edits made to use tables and this section.
#9821	4.05.05 Botanical Garden
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Need screening, esp. since there would probably be piles of mulch and piles of plant waste.
#3790	4.05.05 Botanical Garden
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.04 ARBORETUM, BOTANICAL GARDEN, NATURE STUDY AREA. There is reference to "Events", but no guidance re: setbacks from adjacent homes, or noise volumes.
#4364	4.05.05 Botanical Garden
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Staff can consider similar uses and setbacks for events. "Special Event: A temporary commercial or festive activity or promotion at a specific location that is open to the public and is planned or reasonably expected to attract large assemblies of persons. Special events include, but are not limited to, carnivals, festivals, circuses, music fairs or concerts, tent revivals, art shows, crafts shows, rodeos, corn mazes, civil war reenactments, equestrian shows, firework displays and events, or similar events open to the public. A private party held at a Banquet/Event Facility (including Hotel, Conference Center, Restaurant, Rural Resort, or similar facility), Bed and Breakfast Homestay, Bed and Breakfast Inn, or Country Inn shall not be deemed a special event. AIn addition to events open to the public, a private party which is held at a location other than the foregoing or held on property not occupied by the host, shall be deemed a special event. "Special event" does not include temporary or seasonal retail sales of goods, products, or services, such as temporary sales of Christmas trees, farm produce, fireworks, and other similar seasonal goods."
#3523	4.05.05 Botanical Garden

ID	Section
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/29/2021	It is unclear as to why this section only applies to these few districts when the use is so broadly allowed throughout the county and is permitted outright in a number which would seem to be impacted even more than these.
#3653	4.05.05 Botanical Garden
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	noted. we will review and revise as necessary
#3792	4.05.04 Assembly
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.05 ASSEMBLY. 50-foot set backs for parking/driveways is often insufficient to protect neighbors from vehicular lights and noise; early morning and evening gatherings could negatively impact adjacent homes. A 100-foot set back for all, and specifics re: buffering may be needed so that IF certain locations include private residences, those are optimally protected. 3.06.05.05 ASSEMBLY: Confirm new Section 3.06.01.B applies?
#4365	4.05.04 Assembly
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Parking setback revised. Yes, 3.06.01.B applies.
#3791	4.05.04 Assembly
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.05 ASSEMBLY. B. Approval. Why are larger land uses (300+, 50+ children) a special exception review only for JLMA-1, JLMA-2, JLMA-3 and JLMA-20? A special exception review should be required regardless of district. The current DRAFT Use Matrix shows this use as Special Exception for ARN, ARS, RAR, RV, VR and VAR, with Permitted in RC and VC? Seems inconsistent? Therefore, are D.1. Setbacks from lot lines correct/appropriate?"
#4366	4.05.04 Assembly
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/29/2021	Agreed and thank you. Revised text to remove specific districts. Setbacks revised per previous comment.
#3108	4.05.04 Assembly

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.05.05 Assembly Since a SPEX is required, I have no comments. I favor as much legislative overview as possible, and that sort of approval means it is not necessary to foretell the future (when some uses may become an irritant) or to cover every detail and eventuality in the zoning ordinance.
#10945	4.05.03 Agricultural Education or Research
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.03 AGRICULTURAL EDUCATION OR RESEARCH. As with the AG Cultural Center and Amphitheater above, the same concerns exist. Enforcement of the numbers of vehicles, attendees at any one time, and noise standards are next to impossible to enforce, unless a County agent is required to attend each "event", at least periodically. Would a Special Exception be reasonable for ARN and ARS Districts? Could this entity be excluded from MDODs? 2022 Round 3 Input: Due to the size of structures, visitors and parking allowed this should not be a permitted use on land zoned MDOD in ARN and ARS."
#10944	4.05.03 Agricultural Education or Research
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.05.03 AGRICULTURAL EDUCATION OR RESEARCH. B.2. Visitors/Customers/Parking Spaces. The ""math"" could be used for parking space calculation, but how (in the world) would/could the quantity of visitors, customers or cars allowed on site at any one time be approved OR enforced? Two B or not two B, that is the question. Actually, the second ""B"" (which should be ""C""): a 7,000 sqft structure up to 12K gfa is approaching the size of a ChicFil-A -- how is 100' from all lot lines sufficient? Ditto for ""B""2 and 3 2022 Round 3 Input: The Use standards allow structures up to 12,000 sqft and Parking standards (Ch.5) have a minimum parking of 3/1000 sqft. which would a total minimum of 36 parking slots. If built to the minimum in a permitted area, how could it accommodate ""no more than 100 vehicles at one time,"" and how could that be enforced? If Ch.3 a dn Ch.5 requirements are to be more in line, then additional parking should be required. "
#9820	4.05.03 Agricultural Education or Research
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	B. 4. Storage should be screened.
#9819	4.05.03 Agricultural Education or Research
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	I don't see Ag Ed & Research in the Uses table. Perhaps I missed it.
#9818	4.05.03 Agricultural Education or Research

ID	Section
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/24/2022	Ag. Education & Research is no defined. It's a vague term that needs defining.
#6281	4.05.03 Agricultural Education or Research
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021	3.06.05.03 Ag education center: Why 25 acres? This may be excessive. Acreage should better align with similar uses as well as number of people attending
#3789	4.05.03 Agricultural Education or Research
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.03 AGRICULTURAL EDUCATION OR RESEARCH. As with the AG Cultural Center and Amphitheater above, the same concerns exist. Enforcement of the numbers of vehicles, attendees at any one time, and noise standards are next to impossible to enforce, unless a County agent is required to attend each "event", at least periodically. Would a Special Exception be reasonable for ARN and ARS Districts? Could this entity be excluded from MDODs?"
#4362	4.05.03 Agricultural Education or Research
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/28/2021	Staff can taken these suggestions under consideration.
#3788	4.05.03 Agricultural Education or Research
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.05.03 AGRICULTURAL EDUCATION OR RESEARCH. B.2. Visitors/Customers/Parking Spaces. The ""math"" could be used for parking space calculation, but how (in the world) would/could the quantity of visitors, customers or cars allowed on site at any one time be approved OR enforced? Two B or not two B, that is the question. Actually, the second ""B"" (which should be ""C""): a 7,000 sqft structure up to 12K gfa is approaching the size of a ChicFil-A -- how is 100' from all lot lines sufficient? Ditto for ""B""2 and 3"
#4363	4.05.03 Agricultural Education or Research
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/28/2021	Staff will ensure that Zoning Enforcement reviews text for practicality. Numbering fixed.
#3107	4.05.03 Agricultural Education or Research
By: Charles Houston	3.06.05.02 Agricultural education and research

ID	Section
Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	This speaks of customers and visitors, yet the definition implies a focus on education, presumably of individuals. This is inconsistent. Moreover, why is this here; is it needed? Perhaps the simplest correction is to require a SPEX.
#3411	4.05.03 Agricultural Education or Research
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	Carry-over from 5-644 of existing ZO.
#10913	4.05.02 Agricultural Cultural Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.05.02 AGRICULTURAL CULTURAL CENTER. The definition in the current ZO is not very specific, leaving interpretation open to such entities as breweries, wineries, county fairs, special schools, and any entity considered "agricultural." The 10 acre minimum leaves room for "strip mall" growth possibilities in what the County considers true agricultural (farm; forestal) lands. There is no statement re: the number of visitors/day, or on the property at any given moment. Would a Special Exception be reasonable for the ARN and ARS Districts, and/or MDODs? Could this entity be excluded from MDODs? 2022 Round 3 Input: Due to the size of structures allowed (exceeding 18,000 sqft) this should not be a permitted use on land zoned MDOD in ARN and ARS."
#9816	4.05.02 Agricultural Cultural Center
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	C. 1. State that the FAR applies only to structures... but do you also want to specify how much of the tract can be disturbed or used> (Yes.) And if you do that, then buffers are needed.
#9815	4.05.02 Agricultural Cultural Center
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	This "cultural center" needs an explanation; even the definition is lacking. Especially since it's so vague, this should require a SPEX. Noise, operating hours, lighting and notice to neighbors should be addressed.
#3787	4.05.02 Agricultural Cultural Center
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.02 AGRICULTURAL CULTURAL CENTER. The definition in the current ZO is not very specific, leaving interpretation open to such entities as breweries, wineries, county fairs, special schools, and any entity considered "agricultural." The 10 acre minimum leaves room for "strip mall" growth possibilities in what the County considers true agricultural (farm; forestal) lands. There is no statement re: the number of visitors/day, or on the property at any given moment. Would a Special Exception be reasonable for the ARN and ARS Districts, and/or MDODs? Could this entity be excluded from MDODs?

ID	Section
#4361	4.05.02 Agricultural Cultural Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/28/2021	Staff will address the definition in Chapter 11, vistors/day and other points will be taken under consideration.
#3743	4.05.02 Agricultural Cultural Center
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	Ryan, I understand that it's a carryover, but that doesn't mean we're stuck with it. This use is vague, amorphous and should be deleted.
#3759	4.05.02 Agricultural Cultural Center
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:9/5/2021	This is a defined use in the 1993 ZO and I believe we have some existing agricultural centers
#3106	4.05.02 Agricultural Cultural Center
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.05.02 Agricultural cultural center Why is this here? Suggest deleting this use.
#3410	4.05.02 Agricultural Cultural Center
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	Carry-over text / use from 5-634.
#10912	4.05.01 Amphitheater
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.05.01.I AMPHITHEATER NOISE STANDARDS. Amplified sound carries long distances in MDOD lands, to mountain and valley residents within miles, especially when large swaths of forest are cleared. Does a limit on the annual number of performances, times, and days need to be set? Staff Response: Amphitheaters are a SPEX use in ARN & ARS (the majority of the MDOD). Staff recommends additional considerations be a part of the SPEX process in these areas 2022 Round 3 Input: Due to acoustics and sound travel on mountainside, Amphitheater should not be permitted even by Special Exception on land zoned MDOD in ARN and ARS."
#10911	4.05.01 Amphitheater

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.05.01.H AMPHITHEATER, LIGHTING. How would this be modified in MDODs, if permitted, such as to protect ridge lines, neighbors, and night sky impacts on migrators and pollinators? Staff Response: Amphitheatres are a SPEX use in ARN & ARS (the majority of the MDOD). Staff recommends additional considerations be a part of the SPEX process in these areas 2022 Round 3 Input: To comply with Dark Sky 2019 Comp Plan policies, Amphitheater should not be permitted even by Special Exception on land zoned MDOD in ARN and ARS."
#10910	4.05.01 Amphitheater
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.05.01.F AMPHITHEATER. ROADS/ACCESS. How would 2-lane rural roads, paved or graveled, handle traffic for up to 2000 persons? Would paving be required? (Storm water management; vehicular runoff) How could First Responder, Law Enforcement and private residents' access be guaranteed to a reasonable degree? Staff Response: These issues would need to be addressed at either SPEX or site plan review. 2022 Round 3 Input: Amphitheater should require paved road access only, whether as a permitted or SPEX use."
#10909	4.05.01 Amphitheater
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.05.01 AMPHITHEATER: Is an amphitheater, as specified, appropriate for ARN and ARS lands, as MDODs overlay these districts? The size and volume of "needs" for clearing (Parking, lighting, decibels, septic, water) would significantly impact MDOD environments and thus their important functions (ground water recharge; air cooling and cleansing; storm water run off; pollinators (crops). Would it be reasonable to either not allow in MDODs, or require Special Exception process? 2022 Round 3 Input: Amphitheater should not be permitted even by Special Exception on land zoned MDOD in ARN and ARS."
#10908	4.05.01 Amphitheater
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.05.01 AMPHITHEATER. B. Hours of Operation. Any high-intensity venue (such a this use with up to 2000 seats and outdoor sound systems) should have CONSISTENT hours as other high-intensity uses. Can hours for this use be included that detail early am hours only for deliveries (not performances), and restrict in PM based on proximity to any type of residential areas/homes in TSN, TSC, SM, ARN or ARS districts? Recommend Hours 6am-10pm (incl deliveries) if adjacent to any residentially zoned or used property. 2022 Round 3 Input: Hours of Operation should be established in any district where Amphitheater is a Permitted use vs. Special Exception"
#9817	4.05.01 Amphitheater
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Buffers are needed.

ID	Section
#9814	4.05.01 Amphitheater
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Amphitheater - need provisions re hours of operation, noise/music, lighting, and notice to neighboring property owners.
#9813	4.05.01 Amphitheater
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Amphitheater - this is a good example of using the SPEX process to manage projects that could have significant impact. SPEX should be used much more often.
#6280	4.05.01 Amphitheater
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021	3.06.05.01 Amphitheater: Hours of operation? Will these only have permanent seating? How is this differentiated from a band stand used at most wineries and limited breweries? What is the noise ordinance? What requirements will be in place to reduce noise to adjacent properties?
#3786	4.05.01 Amphitheater
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.01.H AMPHITHEATER, LIGHTING. How would this be modified in MDODs, if permitted, such as to protect ridge lines, neighbors, and night sky impacts on migrators and pollinators? 3.06.05.01.I AMPHITHEATER NOISE STANDARDS. Amplified sound carries long distances in MDOD lands, to mountain and valley residents within miles, especially when large swaths of forest are cleared. Does a limit on the annual number of performances, times, and days need to be set?
#4356	4.05.01 Amphitheater
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/28/2021	Amphitheaters are a SPEX use in ARN & ARS (the majority of the MDOD). Staff recommends additional considerations be a part of the SPEX process in these areas.
#3785	4.05.01 Amphitheater
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com	3.06.05.01.F AMPHITHEATER. ROADS/ACCESS. How would 2-lane rural roads, paved or graveled, handle traffic for up to 2000 persons? Would paving be required? (Storm water management; vehicular runoff) How could First

ID	Section
Date:9/6/2021	Responder, Law Enforcement and private residents' access be guaranteed to a reasonable degree?
#4357	4.05.01 Amphitheater
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/28/2021	These issues would need to be addressed at either SPEX or site plan.
#3784	4.05.01 Amphitheater
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.01 AMPHITHEATER: Is an amphitheater, as specified, appropriate for ARN and ARS lands, as MDODs overlay these districts? The size and volume of "needs" for clearing (Parking, lighting, decibels, septic, water) would significantly impact MDOD environments and thus their important functions (ground water recharge; air cooling and cleansing; storm water run off; pollinators (crops). Would it be reasonable to either not allow in MDODs, or require Special Exception process?
#4358	4.05.01 Amphitheater
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/28/2021	A SPEX is required in ARN & ARS.
#3783	4.05.01 Amphitheater
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.05.01 AMPHITHEATER. B. Hours of Operation. Any high-intensity venue (such a this use with up to 2000 seats and outdoor sound systems) should have CONSISTENT hours as other high-intensity uses. Can hours for this use be included that detail early am hours only for deliveries (not performances), and restrict in PM based on proximity to any type of residential areas/homes in TSN, TSC, SM, ARN or ARS districts? Recommend Hours 6am-10pm (incl deliveries) if adjacent to any residentially zoned or used property.
#3522	4.05.01 Amphitheater
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/29/2021	The use tables show this use as permitted in TSN & TSC. Should those districts be included somehow in the use restrictions? Seems there could be scale issues in those districts.
#3586	4.05.01 Amphitheater
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov	added TSN & TSC

ID	Section
Date:8/31/2021	
#3105	4.05.01 Amphitheater
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.05.01 Amphitheater Suggest limiting hours of operation. No other comments since a SPEX is required and I'm satisfied that applications will thus be scrutinized.
#3409	4.05.01 Amphitheater
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/25/2021	noted
#3593	4.05 Public/Civic/Institutional
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/1/2021	I don't think we should consider country club, conference and training centers, or the other uses as civic uses. They are typically private ventures. I also don't know how we enforce the number of participants or use that as a measure of impacts. Would prefer to set floor area, setback and maybe hours limits on the building and facilities.
#9812	4.04.24 Vehicle Wholesale Auction
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Recycled water is required for car washing? Is that even possible in all instances? I suggest deleting this requirement.
#3124	4.04.24 Vehicle Wholesale Auction
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:8/23/2021	Does within the AI mean within any of the contours even the 1-mile buffer? I know this is the same as the previous ordinance, so is the meaning understood? Is the test driving on-site necessary? How did we develop the regulations on times/days allowed? Are these conditions for the existing large auction?
#3382	4.04.24 Vehicle Wholesale Auction
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	we will work to clarify these questions in the text.
#9811	4.04.22 Vehicle Repair, Heavy

ID	Section
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Heavy Equipment Repair needs screening requirements.
#3687	4.04.22 Vehicle Repair, Heavy
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/2/2021	This use is only allowed in SE and SC districts. It is a less intensive use than others in the districts so I don't see the need for specific standards. It is also a SPEX use in the commercial district making the specific standards moot. Suggest drop the standards or make use permitted.
#2972	4.04.22 Vehicle Repair, Heavy
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	I don't understand the Outside Display. Sounds as if you can't do it. If not in a parking area, where? In any case, why not? How is Outside Display of a vehicle different from a vehicle parked in a lot?
#3381	4.04.22 Vehicle Repair, Heavy
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Edited
#3158	4.04.21 Snack or Beverage Bars
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.19 SNACK OR BEVERAGE BARS: Why is there no noise provisions for this use? Apply Section 5.12B if it is similar to old 5.652B.
#3379	4.04.21 Snack or Beverage Bars
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	agreed. we may look to reorganize and avoid the redundancy of referencing the noise standards in each individual standard here.
#3104	4.04.21 Snack or Beverage Bars
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.19 Snack bars As defined, this could include major chain operations, especially Starbucks, to open anywhere in the RPA on a by-right basis. Addressing this might best be done in the Definitions section, by saying franchises and chains are not included. To reinforce this, change the name of the

ID	Section
	use to "Snack bars - Locally owned." I would also suggest that a snack bar require a SPEX.
#3380	4.04.21 Snack or Beverage Bars
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Staff have considered the proposed change, however at this time, staff supports the draft language.
#10943	4.04.20 Small Business, Agricultural, and Rural
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"03.06.04.20 SMALL BUSINESS, AGRICULTURAL AND RURAL. ""A. Adaptive Re-use of Farm Structures. This Section provides for the adaptive re-use of farm structures for home occupations and small businesses."" ADD TEXT: ""Adaptive Reuse must be performed to the Secretary of the Interior (NPS) Standards for historic preservation projects.""
#9810	4.04.20 Small Business, Agricultural, and Rural
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	By "Heavy Equip. (on-site,) I presume you mean the number of pieces of heavy equipment. You should state it that way.
#9809	4.04.20 Small Business, Agricultural, and Rural
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	It's fine to state that these uses are considered temporary, but how on earth would you enforce that? This may be a case where neighbors complain, though LoCo has a reputation of slack zoning enforcement.
#9808	4.04.20 Small Business, Agricultural, and Rural
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Purpose: Contracting small businesses are a special problem. They irritate neighbors with dump trucks and heavy equipment, materials and waste storage can be a problem. The answer is to make a separate category of small business-contracting. Impose screening requirements and probably require an M.
#3157	4.04.20 Small Business, Agricultural, and Rural
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.18 SMALL BUSINESS, AGRICULTURAL & RURAL. Need better parameters, such as footprint of the business structures, storage, etc. A single owner contractor could clear large parking and storage areas for supplies, equipment, etc. How will "small" be defined?

ID	Section
#3374	4.04.20 Small Business, Agricultural, and Rural
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021</p>	<p>current definition: Small Business: A business or service which may be conducted in a private residence that is considered temporary for the purpose of starting a new business and operates according to the restrictions and standards established by this Ordinance. For the purposes of this definition the following terms have the meaning herein ascribed to them: a. Structure. A structure used for a small business. b. Business vehicles. Automobiles, vans, pick-up trucks, motorcycles, and other similar vehicles requiring Department of Motor Vehicle tags and designed and primarily used to transport people. c. Employees. Persons, other than members of the household permanently residing on the premises, who are engaged onsite in the operation of the small business on a regular or occasional basis. d. Heavy equipment. Bulldozers, fork lifts, compactors, paving cutters, backhoes, skid loaders, and any other motorized or similar equipment which is primarily used to perform heavy work activities, and not used to transport passengers, and which do not require or use Department of Motor Vehicle tags; and dump trucks requiring 26,000 pounds gross vehicle weight; and passenger and tour buses, excluding school buses and 16-seat commuter vans; and vans and large pick-up trucks modified for heavy work, all of which are used for off-site income producing purposes. Any heavy equipment used principally for agricultural uses onsite may be used offsite for small business uses listed in Section 5-614(D). The term "heavy equipment" includes all vehicles not classified as "business vehicles", as defined above, which are associated with the small business. Additionally, trailers used for transporting heavy equipment are considered accessory to the heavy equipment. e.Storage yard. An outdoor space accessory to a permissible use and used for the purpose of storing equipment, vehicles, construction materials and similar items necessary to a permissible business.</p>
#3156	4.04.20 Small Business, Agricultural, and Rural
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021</p>	<p>"03.06.04.18 SMALL BUSINESS, AGRICULTURAL AND RURAL. ""A. Adaptive Re-use of Farm Structures. This Section provides for the adaptive re-use of farm structures for home occupations and small businesses."" ADD TEXT: ""Adaptive Reuse must be performed to the Secretary of the Interior (NPS) Standards for historic preservation projects."" "</p>
#3376	4.04.20 Small Business, Agricultural, and Rural
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021</p>	<p>Will be covered under Adaptive Reuse, Development Standards Section 5.09.</p>
#3155	4.04.20 Small Business, Agricultural, and Rural
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com</p>	<p>"3.06.04.18 SMALL BUSINESS, AGRICULTURAL AND RURAL. E.3. Accessory Structures, Agriculture. ""An approved zoning/building permit IS REQUIRED for the change in use"" vs. ""zoning/building permit shall be received for the change of use."" H. Parking. Additional regulations should be considered beyond</p>

ID	Section
Date:8/23/2021	compliance for 5.05.03 for the volume and type of vans and/or trucks in addition to employee and customer vehicles. Exterior Lighting standards reference new Section 5.12.A.1-3; how do they differ from current Section 5-652(A)? J. Noise standards reference new Section 5.12.b; how do they differ from Section current Section 5-652(B)? Without review of the referred-to sections, review of this use should be considered ""in-progress"" only, not final."
#3375	4.04.20 Small Business, Agricultural, and Rural
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	noted & Though Chapter 5: Development Standards are still being drafted, the current language in 5-652.B has been copied into the new 5.12
#3103	4.04.20 Small Business, Agricultural, and Rural
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.18 Small Business D. 3 & 4. Repair businesses and contractors could be problematic. Suggest treating them differently, with beefed-up screening, limits on outdoor storage, perhaps addressing noxious odors, etc.
#3377	4.04.20 Small Business, Agricultural, and Rural
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Edited to be more comparable to other rural use-specific standards.
#2971	4.04.20 Small Business, Agricultural, and Rural
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	setbacks for buildings should be no more restrictive than other buildings in a district.
#10942	4.04.19 Restaurant
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.04.19.C. RESTAURANT. Intensity. As indicated at Aug. 25th ZOC meeting, this use was to combine ""Restaurant"" with ""Farm Restaurant,"" which means consideration Hours of Operation should vary by location (e.g., residential vs. non-residential, INCLUDING residential ""uses"" in Agricultural districts ARN/ARS). Midnight is too late for any type of residential. Should be no later than corresponding hours for similar intensity uses. Can a table be added to define Hours of Operation based on location and include that early am hours (e.g., 6am) are for deliveries only ?"
#9807	4.04.19 Restaurant

ID	Section
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Roads/access: Require that restaurants be on Arterial or major collector roads.
#10259	4.04.19 Restaurant
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/17/2022	replaces the road classes with "public road"
#9806	4.04.19 Restaurant
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Hours of operation should be 7:00 to 11:00 except Friday and Saturday when closing could be at midnight.
#9805	4.04.19 Restaurant
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Approval: Do not let any restaurant open by-right, even if on an active farm. While the concept is good, things could get out of control.
#9804	4.04.19 Restaurant
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Applicability: Do not allow restaurants in Mountainside Overlay Districts.
#9803	4.04.19 Restaurant
By: Charlie Houston Tags: zoc CharlesHosuton3@yahoo.com Date:4/23/2022	Restaurants can be busy and intrusive operations; they can also be wonderful. To prevent less of the former and more of the latter, require SPEX so that there is public comment and legislative oversight. (This is a great example of a situation where neighbors must be given prompt notice of such plans.)
#3782	4.04.19 Restaurant
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.06.04.17.C. RESTAURANT. Intensity. As indicated at Aug. 25th ZOC meeting, this use was to combine ""Restaurant"" with ""Farm Restaurant,"" which means consideration Hours of Operation should vary by location (e.g., residential vs. non-residential, INCLUDING residential ""uses"" in Agricultural districts ARN/ARS).

ID	Section
	Midnight is too late for any type of residential. Should be no later than corresponding hours for similar intensity uses. Can a table be added to define Hours of Operation based on location and include that early am hours (e.g., 6am) are for deliveries only ?"
#4355	4.04.19 Restaurant
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/28/2021	Staff recommended standards are for all restaurants, including hours of operation.
#3154	4.04.19 Restaurant
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.04.17 RESTAURANT: D.3. Location site/dimension standards. Is 100 feet for up to 1,500 sqft GFA sufficient? . Exterior Lighting standards reference new Section 5.12.A.; how do they differ from current Section 5-652(A)? No noise regulation noted. Section 5.12B should be applied if it is similar to old 5.652B. "
#3369	4.04.19 Restaurant
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Though Chapter 5: Development Standards are still being drafted, the current language in 5-652.B has been copied into the new 5.12
#3153	4.04.19 Restaurant
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.04.17.B RESTAURANT. B. APPROVAL. RESTAURANT vs. FARM Restaurant (now combined). If the result from ZOAM-2015-0006 was to have ONE regulation to describe the same Use (Restaurant) regardless of location, why would they not both still require the same minor special exception review and approval for the health, safety and welfare of patrons? Appears inconsistent otherwise. At the Nov. 1, 2016, BOS Meeting, (ZOAM)-2015-0006, Rural Uses and Historic Structures was approved, with direction to prepare amendments to include "Restaurant" uses in open space. April 19, 2018 BOS Item 10a further described the ZOAM purpose to: Rename "Restaurant" under the agriculture support and service directly related to on-going agriculture, horticulture and animal husbandry activity, on-site use category to "Farm Restaurant" in the AR zoning districts. Currently, "Restaurant" is listed twice in both the AR-1 and AR-2 districts, as a permitted use under the agriculture support and service directly related to on-going agriculture, horticulture and animal husbandry activity, on-site use category and as a minor special use under the commercial food and beverage use category. Amendment provides a clearer distinction between the two types of restaurants (farm support vs. commercial) currently allowed in the AR districts and avoids future misunderstandings by renaming the permitted "Restaurant" under the agriculture support and service directly related to on-going agriculture, horticulture, and animal husbandry activity, on-site use category to "Farm Restaurant.""

ID	Section
#3102	4.04.19 Restaurant
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Restrict heights to one story (In fact, the performance standards for just about every use should specify a height limit, which could vary between zoning districts.)
#3371	4.04.19 Restaurant
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	The current language is carry-over language. We have considered limiting building height, however at this time, staff supports the draft language.
#3101	4.04.19 Restaurant
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.17 Restaurant The Uses table has sit-down restaurants and take-oy restaurants. Why aren't there separate performance standards here? C. Limit hours to 10 PM on weekdays.
#3372	4.04.19 Restaurant
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Use table corrected. Thank you.
#2970	4.04.19 Restaurant
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/20/2021	location on site needs to be flexible for adaptive reuse structures similar to site size and FAR for such structures. Perhaps a SPEX or modification allowance.
#9802	4.04.18 Personal Services
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	This seems to be for a dry cleaners, and that's a pretty intense use for anywhere in the RPA. Suggest a SPEX in RPA districts.
#9801	4.04.18 Personal Services

ID	Section
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	The Mobile Vendors section is missing, but I think my hard copy looks pretty good. I would address signage and lighting, though.
#3547	4.04.18 Personal Services
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:8/29/2021	Since this is a commercial use in a commercial district, why limit the floor area?
#3639	4.04.18 Personal Services
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	This standard applies only to cleaning and garment services (i.e. dry cleaner.) The floor area restriction is prevent the establishment of what can be referred to as a dry cleaning plant. A dry cleaning plant is a hub facility for dry cleaning service storefronts. The plants receive, process and return garments to service storefronts. This limitation also serves to minimize any environmental impacts.
#3100	4.04.18 Personal Services
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.16 Personal Services Shouldn't this also include hair salons, barber shops, spas? Shouldn't the performance standards include size limits?
#3368	4.04.18 Personal Services
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	The proposed "personal services" definition will include those uses as well. This existed in Article 8 - Definitions previously and contained standards that needed to be removed from definitions. Size limits and other standards are open for discussion.
#3152	4.04.17 Mobile Vendor
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.04.15 MOBILE VENDOR (a.k.a. Food Trucks). Was this one of the Draft Text Sections that was leaked and then escalated to Supervisors via complaint, thereby delaying the ZOC meetings by a week? If so, then Staff should restate the process by which Draft Text input should and will be provided, through the identified Focus Groups and Advisory Groups, and confirm that no ""new"" pathways for input after 18 months will be allowed."
#3367	4.04.17 Mobile Vendor
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	The initial draft text of 3.06 - Use-Specific Standards was distributed beyond its intended audience. The "rough draft" nature of the initial text has been reiterated to staff. The ZOC remains the first public distribution of draft text in the process.

ID	Section
#3533	4.04.16 Kennels/Indoor Kennels
By: John Merrithew Tags: zoc Date:8/29/2021	So few standards. Suggest this use does not need specific standards.
#3636	4.04.16 Kennels/Indoor Kennels
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	Noted. Staff will consider removing or otherwise addressing.
#3532	4.04.16 Kennels/Indoor Kennels
By: John Merrithew Tags: zoc Date:8/29/2021	Curious why so many uses are limited to one access point. in the case of kennels, like daycares, they benefit from drop off/pickup configuration with two driveways.
#3637	4.04.16 Kennels/Indoor Kennels
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	Noted. Staff will consider options.
#3099	4.04.16 Kennels/Indoor Kennels
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.15 Kennels B.1. Many kennels have "dog doors" opening into very small outside enclosures, with wire walls and roofs. This seems reasonable but would be forbidden by this section. Much more importantly, there should be a maximum size, either number of animals or square footage.
#3364	4.04.16 Kennels/Indoor Kennels
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	This provision addresses "indoor kennels." If a kennel wishes to have outdoor runs, regardless of size, it must be permitted as an outdoor kennel.
#9800	4.04.15 Feed and Farm Supply Center
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	B. Should heavy equipment be screened?

ID	Section
#10941	4.04.14 Farm Markets
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.04.14. FARM MARKETS. Defer to REDC ZOR-AdHoc Committee input 2022 Round 3 Input: If the definition of farm market is for the majority of product to be made on that farm, then these should be allowed on gravel roads, where most farms are located. However, this seems to closely resemble the wayside stand definition. Suggest staff review farm market, farm market off site and wayside stand for overall consistency."
#9703	4.04.14 Farm Markets
By: russ forno Tags: zoc russ.forno@ofplaw.com Date:4/19/2022	Allow indoor farm markets. Why restrict to paved areas? Farm markets can be small and require a 20x20 indoor space.
#6279	4.04.14 Farm Markets
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021	Should be allowed on gravel roads.
#3451	4.04.14 Farm Markets
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	Given the large number of unpaved roads in the county the access requirements will severely limit the number of farms able to run a market like this and we do not have the same requirements for limited breweries.
#3634	4.04.14 Farm Markets
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	The road access standards that apply to limited breweries are referenced in that section of the draft ordinance. Those standards define the requirements for road class types and are consistent with those for farm markets.
#4353	4.04.14 Farm Markets
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/28/2021	Edited to allow farm markets on other roads and to match Limited Brewery standards.
#3450	4.04.14 Farm Markets

ID	Section
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	I think the % of product produced in Loudoun for a Loudoun farm market should be higher than 25% but certainly not lessened.
#3635	4.04.14 Farm Markets
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	Noted. Staff will consider this and revise as appropriate.
#4354	4.04.14 Farm Markets
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/28/2021	Increased to 50%
#3151	4.04.14 Farm Markets
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.13. FARM MARKETS. Defer to REDC ZOR-AdHoc Committee input
#3360	4.04.14 Farm Markets
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	REDC comments sent to ZOC 8/24/2021
#3390	4.04.14 Farm Markets
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/24/2021	I don't believe you received comments from REDC on Use-Specific Standards. Comments sent recently were for STRR/CWH ZOAM. Comments were received from other organizations.
#3675	4.04.14 Farm Markets
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Correct. We will review comments from REDC AOR-AdHoc when received.
#3098	4.04.14 Farm Markets

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	E.1. Should be 10% of the indoor sales area. Strongly suggest a separate use - "Farm market small scale" perhaps defined as less than one acre total space including parking, 500 sf maximum indoor space and 500 sf maximum outdoor sales space. This lets individuals to set up small shops or stands to sell their mown products. There are examples of this in various places.
#3361	4.04.14 Farm Markets
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	see #3097
#3097	4.04.14 Farm Markets
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	E.1. Should be 10% of the indoor sales area. Strongly suggest a separate use - "Farm market small scale" perhaps defined as less than one acre total space including parking, 500 sf maximum indoor space and 500 sf maximum outdoor sales space. This lets individuals to set up small shops or stands to sell their mown products. There are examples of this in various places.
#3096	4.04.14 Farm Markets
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.13 Farm markets Unnecessary underlining in several places.
#3363	4.04.14 Farm Markets
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	agreed. will clean up.
#3095	4.04.13 Farm Machinery
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.12 Farm machinery This section needs further development to include considering inside sales/service and outdoor sales-display and storage areas. Lighting standards would be good. I assume that there is no need to refer to signage since it would be controlled by that ordinance.
#3150	4.04.12 Drive-through Facilities Associated With Banks, Financial Institutions and Pharmacies
By: Maura Walsh-Copeland Tags: zoc	3.06.04.11.C DRIVE-THROUGH FACILITIES. You're leaving us in suspense! "and an escape lane shall" ?

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:8/23/2021</p>	
#3357	4.04.12 Drive-through Facilities Associated With Banks, Financial Institutions and Pharmacies
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021</p>	fixed. deleted shall and ended with a period.
#3094	4.04.12 Drive-through Facilities Associated With Banks, Financial Institutions and Pharmacies
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021</p>	3.06.04.11 Banks etc. with drive-through lanes. "C" is an incomplete sentence.
#3358	4.04.12 Drive-through Facilities Associated With Banks, Financial Institutions and Pharmacies
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021</p>	noted edited and corrected.
#10940	4.04.11 Craft Beverage Manufacturing
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	"3.06.04.11.B.1.b CRAFT BEVERAGE MANUFACTURING: Setback of 50 feet may or may not be adequate. Needs review as created. Staff Response: Carry-over language from 5-668. open to discussion on adequate setbacks / current issues experienced"
#10938	4.04.11 Craft Beverage Manufacturing
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	"3.06.04.11 CRAFT BEVERAGE MANUFACTURING. As a Use with outdoor tasting rooms and activities as well as alcohol, food and exterior lighting, this use should be made CONSISTENT with defined Hours of Operation. Suggest 11am to 11pm. Staff Response (8/2021) ""Agreed."" 2022 Draft Text -- no reference to hours of operation (VaABC restriction?)"
#9799	4.04.11 Craft Beverage Manufacturing
<p>By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com</p>	C. Are "central water and central sewer" defined anywhere?

ID	Section
Date:4/23/2022	
#9798	4.04.11 Craft Beverage Manufacturing
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	B. 2. A restaurant "in accordance with the applicable zoning district" is somewhat unclear. Do you mean that such a restaurant will be treated as restaurants ae treated?
#3149	4.04.11 Craft Beverage Manufacturing
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.10.B.1.b CRAFT BEVERAGE MANUFACTURING: Setback of 50 feet may or may not be adequate. Needs review as created.
#3352	4.04.11 Craft Beverage Manufacturing
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	carry-over language from 5-668. open to discussion on adequate setbacks / current issues experienced.
#3148	4.04.11 Craft Beverage Manufacturing
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.10 CRAFT BEVERAGE MANUFACTURING: Noise regulation (Section 5.12B if similar to old 5.652B) needs to be applied.
#3353	4.04.11 Craft Beverage Manufacturing
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Though Chapter 5: Development Standards are still being drafted, the current language in 5-652.B has been copied into the new 5.12
#3147	4.04.11 Craft Beverage Manufacturing
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.10 CRAFT BEVERAGE MANUFACTURING. As a Use with outdoor tasting rooms and activities as well as alcohol, food and exterior lighting, this use should be made CONSISTENT with defined Hours of Operation. Suggest 11am to 11pm.
#3354	4.04.11 Craft Beverage Manufacturing

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	agreed update - added proposed hours of operation
#3093	4.04.11 Craft Beverage Manufacturing
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	B.1.a Tasting rooms. Suggest this language: "Indoor and outdoor facilities, collectively, for tasting rooms and ..." As drafted, indoor rooms have a maximum size but outdoor seating does not have a size limit. Suggest specifying maximum hours of operation.
#3092	4.04.11 Craft Beverage Manufacturing
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.10 Craft beverage manufacturing Suggest removing "manufacturing" from the title since sales and consumption are allowed.
#3356	4.04.11 Craft Beverage Manufacturing
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	The principle use is "manufacturing." Staff will recommend the language remain as it pertains to the use.
#6278	4.04.10 Convenience Stores
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021	3.06.04.10 Convenience Store: Why nothing on lighting or distance from lot line (except for street frontage)?
#3146	4.04.10 Convenience Stores
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.09.F CONVENIENCE STORES NOISE: Section 5.12B should be applied if it is similar to old 5.652B. Open until 5.12B reviewed
#3350	4.04.10 Convenience Stores
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Though Chapter 5: Development Standards are still being drafted, the current language in 5-652.B has been copied into the new 5.12

ID	Section
#3091	4.04.10 Convenience Stores
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.09 Convenience store Suggest specifying hours of operation, even if it's open 24 hours per day.
#9797	4.04.09 Commercial Nursery
By: Charlie Houston Tags: zoc CharlesHosuton3@yahoo.com Date:4/23/2022	D.2. Be specific - do you mean 25% of the INDOOR sales area? Then say so.
#4237	4.04.09 Commercial Nursery
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/16/2021	3.06.04.08 An existing typo has been carried over under D, first sentence..."the culture and care of plant sold..."
#4346	4.04.09 Commercial Nursery
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/28/2021	fixed. thank you.
#3542	4.04.09 Commercial Nursery
By: John Merrithew Tags: zoc Date:8/29/2021	Agree with previous comments that on site production should not be required for commercial nurseries.
#3633	4.04.09 Commercial Nursery
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	Noted. Thank you.
#3090	4.04.09 Commercial Nursery
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com	3.06.04.08 Commercial nursery 3.06.04.08. B. On-site production should not be a requirement.

ID	Section
Date:8/23/2021	3.06.04.08.D.2. Accessory products sales area is not to exceed 25% of the "gross sales area." That's an undefined term; is it indoor or outdoor area? Again, an example of lack of drafting precision.
#3349	4.04.09 Commercial Nursery
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	language is carry-over and reorganized from existing 5-605. Open to discussion.
#10937	4.04.08 Child Day Care
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.04.08. CHILD DAY CARE. It's been a while since reviewing the prior ZOAM for Child Day Care centers, but can you refresh my memory why "written notice of Zoning Permit application" is or cannot be also mailed to HOA Boards with KNOWN address and/or management? (i.e., primarily HOAs in TPA and SPA)?
#3393	4.04.08 Child Day Care
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:8/24/2021	Child Day Homes: Section 8(D) Common interest community owned amenities are not for public access. For this reason, play areas and parking owned by HOAs or condo associations should be specifically excluded within this section.
#3585	4.04.08 Child Day Care
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/31/2021	revised to only include public parks.
#3145	4.04.08 Child Day Care
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.07. CHILD DAY CARE. It's been a while since reviewing the prior ZOAM for Child Day Care centers, but can you refresh my memory why "written notice of Zoning Permit application" is or cannot be also mailed to HOA Boards with KNOWN address and/or management? (i.e., primarily HOAs in TPA and SPA)?
#3346	4.04.08 Child Day Care
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	tabling for follow-up

ID	Section
#3088	4.04.08 Child Day Care
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.07.C Child care Suggest limits on number of children.
#3347	4.04.08 Child Day Care
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	to clarify, are you suggesting a limit on the number of children at or above the age of 13?
#3087	4.04.08 Child Day Care
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.07.B Child day homes There's an unnecessary quotation mark in B 2. A "P" is missing in the first line of B 5 and unnecessary underlinings in B 9 and B 13.
#3348	4.04.08 Child Day Care
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Fixed. Thank you.
#3086	4.04.07 Business Support Services
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.06 Business support services Suggest a one-story height limit. Suggest that outdoor storage be required to be fenced (with screening fencing) as well as buffers. Suggest specific standards for outdoor storage, probably district-by-district. This use could get out of hand - visualize a parking lot with 20 or more service trucks.
#9795	4.04.06 Building Maintenance Services
By: Charlie Houston Tags: zoc CharlesHosuton3@yahoo.com Date:4/23/2022	Does "enclosed" mean roofed or just screened?
#3085	4.04.06 Building Maintenance Services
By: Charles Houston	3.06.04.05 Building maintenance

ID	Section
Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	Add more performance standards, especially FAR. Suggest a one-story height limit.
#3344	4.04.06 Building Maintenance Services
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	yes, more standards to come.
#11108	4.04.05 Banquet/Event Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"BANQUET/EVENT FACILITY – Use is INCONSISTENT in designation and scale/size of use for residential areas throughout Policy Areas. -- Permitted: Rural Commercial, Village Commercial, UPA, SM(SPA Mixed use), SPA Employment -- Modified SPEX: RN, RS, RV, VAR, SAR, TLN-10, TLN-3-- SPEX: VR (Village Residential), Suburban Residential 1 (SR-1), JLMA-3 -- Definition also allows use as “ancillary component of other uses, such as, but not limited to . . . Rural Resorts . . . and similar uses.” Actual expansion of event facilities has been to wineries and Limited Breweries, which are not “similar uses.” ALL Agricultural and Residential locations: in TPA, JLMA and RPA should equally be SPEX to mitigate current loopholes, abuse and zoning enforcement issues. LCPCZ Zoning Audit and case studies have shown these facilities produce major impacts in residential areas, therefore, Modified special exception is insufficient. At a minimum Use should be a full SPEX for applications that exceed XXX attendees (200?) Y times per year with enforcement if applications and actual use are shown to be exceeding performance standards. https://loudouncoalition.org/wp-content/uploads/2020/04/RuralZoningComparison-3-15-2017.pdf"</p>
#10936	4.04.05 Banquet/Event Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.04.05.B4b BANQUET/EVENT FACILITY: Setback should be revised to include MINIMUMS by Scale Level to be negotiated via SPEX
#10935	4.04.05 Banquet/Event Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.04.05.B BANQUET/EVENT FACILITY. How are multiple Uses co-located with a Banquet Event Facility evaluated at application? Intensity of multiple uses has become a key driver for the overall impact (road access, noise, lighting, buffering, etc.) and intensity, resulting in zoning enforcement issues due to lack of clarity or regulation.

ID	Section
#10872	4.04.05 Banquet/Event Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.04.05 BANQUET/EVENT FACILITY. Should not be allowed in MDODs. If allowed in MDODs, must be by Special Exception. 2022 ROUND 3 PUBLIC INPUT: Banquest/Event Facilities should not be allowed in MDOD. If allowed, it must be by Special Exception."
#9794	4.04.05 Banquet/Event Facility
By: Charlie Houston Tags: zoc CharlesHosuton3@yahoo.com Date:4/23/2022	Banquet and event facilities should require a SPEX.
#10254	4.04.05 Banquet/Event Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/16/2022	Within the RPA, TPA and JLMA, these are only by-right permitted in VC districts. Otherwise they are minor or full SPEX.
#4236	4.04.05 Banquet/Event Facility
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/16/2021	Agree with Maura Walsh-Copeland's comments re: noise, set-back, multiple uses, location (not in MDOD) and scale.
#3781	4.04.05 Banquet/Event Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.04.04.B4b BANQUET/EVENT FACILITY: Setback should be revised to include MINIMUMS by Scale Level to be negotiated via SPEX
#3755	4.04.05 Banquet/Event Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/5/2021	3.06.04.04.B BANQUET/EVENT FACILITY. How are multiple Uses co-located with a Banquet Event Facility evaluated at application? Intensity of multiple uses has become a key driver for the overall impact (road access, noise, lighting, buffering, etc.) and intensity, resulting in zoning enforcement issues due to lack of clarity or regulation.
#3144	4.04.05 Banquet/Event Facility

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.04.B4b BANQUET/EVENT FACILITY: Setback should be a minimum of 200 feet from property line to buffer neighbors
#3143	4.04.05 Banquet/Event Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.04 BANQUET/EVENT FACILITY. Should not be allowed in MDODs. If allowed in MDODs, must be by Special Exception, and must, at a minimum, meet all permit and operation criteria established for Brewery, Limited
#3340	4.04.05 Banquet/Event Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	tabling for 'Overlay District' consideration. agree the intensity of use may be similar to a brewery, limited.
#3142	4.04.05 Banquet/Event Facility
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.04.04. BANQUET EVENT FACILITY. C.1. ROAD/ACCESS standards now reference the new Section 5.13. To determine agreement, please provide DRAFT text for this section to determine what differences, if any, apply from Section 5-654. EXTERIOR LIGHTING standards reference new Section 5.12.A.1-3; how do they differ from current Section 5-652(A)? F. NOISE standards reference new Section 5.12.b; how do they differ from Section current Section 5-652(B)? Without review of the referred-to sections, review of this use should be considered ""in-progress"" only, not final."
#3341	4.04.05 Banquet/Event Facility
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	The draft language in these sections is identical to the existing ZO.
#3084	4.04.05 Banquet/Event Facility
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.04 Banquet and event facilities Hours of operation - should cease at 10:00 PM weekdays.

ID	Section
#2965	4.04.05 Banquet/Event Facility
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/19/2021	Number of attendees: an example, if you have 40 acres, can you have the math calculated number of 240 attendees? If so, what is the point of the table? If not, what is the point of providing rate listed above the table?
#3141	4.04.03 Auction House
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.03.I AUCTION HOUSE. NOISE: Section 5.12B should be applied if it is similar to old 5-652B. Open until 5.12B can be reviewed.
#3336	4.04.03 Auction House
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Though Chapter 5: Development Standards are still being drafted, the current language in 5-652.B has been copied into the new 5.12
#3140	4.04.03 Auction House
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.03.D AUCTION HOUSE: Setback should be a minimum of 200 feet from property line to properly buffer neighboring areas.
#3083	4.04.03 Auction House
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.03 Auction house Suggest four different classifications: Auction - animal; Auction - equipment; Auction - vehicles; and Auction - personalty. ("Personalty" is a legal term but it picks up everything from art to zithers.) Each of these have unique characteristics. However, since a SPEX or a ZOAM is required in the RPA, this suggestion is more important in the UPA and SPA.
#9881	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:4/25/2022	I am bewildered by the need to apply special standards to antique shops, galleries and studios! They are typically not noisy, overcrowded, or otherwise obnoxious.
#9793	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop

ID	Section
By: Charlie Houston Tags: zoc CharlesHosuton3@yahoo.com Date:4/23/2022	C. 2. Art studios can be limited to 2,000 sf for P and larger if SPEX. Art galleries can be up to 10,000 sf.
#3539	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: John Merrithew Tags: zoc Date:8/29/2021	Standards seem excessive.100-foot setback? Hours of operation? Was not aware antique shops are an issue out west.
#3632	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	Noted. We will consider this and make appropriate revisions.
#3139	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.01.I ANTIQUE SHOP/ART GALLERY NOISE: Section 5.12B should be applied if it is similar to old 5.652B. Open until reviewed.
#3328	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Though Chapter 5: Development Standards are still being drafted, the current language in 5-652.B has been copied into the new 5.12
#3335	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Though Chapter 5: Development Standards are still being drafted, the current language in 5-652.B has been copied into the new 5.12
#3082	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.02.c.1 Size of lot: 1 acre works in ARN and ARS but is too large elsewhere. Simply include these in the general retail category.
#3081	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.02 Antique store, art studio, etc. In the Uses table, an art studio is in the Public/Civic/Institutional category. In that Uses table I do not see "antique store," "art gallery" or "craft shop." These could simply be part of "retail, general" in the Uses table. Art studios should be permitted in ARN and ARS. Art galleries of less than 500 sf should be permitted in ARN and ARS if there are an accessory use to an art studio. Art studios should be limited to 2 artists; more should require an MPEX. (Hill High would be an example.)
#3331	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	antique shop, art gallery, studio and craft shop are included within the definition of "retail use."
#2969	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: John Merrithew Tags: zoc Jm@loudoun.gov Date:8/20/2021	Antique shop seems to be a very low impact use. Not sure why we can't live with normal district standards. A number of standards simply refer to the relative sections of the ordinance that I assume would apply anyway. Why not have one universal statement for noise, lighting and historic structures, road access, parking and buffers.
#3332	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	noise, lighting, parking and buffers have been pulled out as their own standards.
#2964	4.04.02 Antique Shop, Art Gallery, Studio or Craft Shop
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/19/2021	Why are art galleries, etc. limited in size to 3,000 while an antique shop may be 10,000 sf? Seems the same standards should apply.
#3531	4.04.01 Animal Hospital
By: John Merrithew Tags: zoc Date:8/29/2021	Max size is 7500sf but there's a 15000sf standard.
#3631	4.04.01 Animal Hospital
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	The maximum size of 7,500 sf only applies in the UM and UE districts. Other districts are permitted animal hospitals in excess of 7,500 sf.

ID	Section
#3080	4.04.01 Animal Hospital
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.04.01 Animal Hospital A SPEX is required in ARN and ARS. There are important equine clinics in ARN and ARS. Instead of requiring a SPEX, I suggest a MPEX if the facility is for equines or farm animals rather than for domestic pets. Where are the suggested standards for kennels and vets? Where are suggested standards for adult and child day care? For banks?
#3327	4.04.01 Animal Hospital
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	kennels and child day care are subsections within section 3.06.04. Adult day care and banks did not have existing standards in the ZO. Can be considered if necessary.
#3138	4.04 Commercial
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.04.01.G COMMERCIAL/MIXED USE NOISE: Section 5.12B should be applied if it is similar to old 5.652B. Open until reviewed.
#4340	4.04 Commercial
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	Section 5.12 will be applicable to all uses in this section.
#12302	4.03.05 Hotel/Motel
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/14/2022	Hotel/motel use is permitted only in SN-6 residential districts, which seems unrelated to the density or intensity of the use. As a potentially more intense use, it seems better suited to the higher density residential districts.
#3538	4.03.05 Hotel/Motel
By: John Merrithew Tags: zoc Date:8/29/2021	Is B.2. necessary? Isn't the environmental standard universal?
#3624	4.03.05 Hotel/Motel

ID	Section
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	This is carryover language from the current ordinance. We will address its appropriateness in the draft ordinance.
#3537	4.03.05 Hotel/Motel
By: John Merrithew Tags: zoc Date:8/29/2021	I don't understand the access restriction unless hotels are permitted in residential zoning districts. otherwise if there are local streets in a commercial district, why not allow them to be used. A hotel is not a high traffic generator.
#3630	4.03.05 Hotel/Motel
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	This is carryover language from the current ordinance. From my reading access to local streets in a commercial district could be permitted, the use would just be required to provide access to a collector or arterial road.
#2963	4.03.05 Hotel/Motel
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/19/2021	Question whether the standard of 30 sf per room for mtg/conf is a reasonable standard. A 100 room hotel would be required to have 30,000 for such use, which may not actually be needed. Is there some other way to do this?
#3325	4.03.05 Hotel/Motel
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Carry over language from 5-611. we will revisit this standard.
#10933	4.03.04 Guest Farm or Ranch
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.03.04. GUEST FARM OR RANCH. Confirm definition of ""FARM"" as used for Guest Farm Staff response: We will need to table this and ensure it is addressed in Definitions. 2022 ROUND 3 INPUT: DEFINE ""FARM"" AS REFERENCE OR REQUIREMENT FOR ALL APPLICABLE USES"
#10931	4.03.04 Guest Farm or Ranch
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.03.04 GUEST FARM OR RANCH. How will this use be differentiated from STRR/CWH rentals in applicability, permit approval and enforcement? Staff Response: This use needs further defined and standards. This was a carryover from existing definitions that had no additional standards. More to come"

ID	Section
#3551	4.03.04 Guest Farm or Ranch
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:8/29/2021	Why distinguish between this use and a short term rental or B&B? Particularly since guests are less of an impact given the size of the parcel.
#3670	4.03.04 Guest Farm or Ranch
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	staff can consider consolidation
#3421	4.03.04 Guest Farm or Ranch
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	This is very light on details. Leasing rooms implies longer stays so I would alter that to rented. What differentiates guest farm/ranch from another form of inn and how are we regulating that? There seems to be a lot of detail missing.
#3619	4.03.04 Guest Farm or Ranch
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	Leasing has been revised to renting. These standards have been consolidated from a tables found within the ordinance. We can add standards as deemed necessary.
#3137	4.03.04 Guest Farm or Ranch
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03.04. GUEST FARM OR RANCH. Confirm definition of "FARM" as used for Guest Farm
#3322	4.03.04 Guest Farm or Ranch
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	we will ensure it is addressed in Definitions.
#3136	4.03.04 Guest Farm or Ranch
By: Maura Walsh-Copeland Tags: zoc	3.06.03.04 GUEST FARM OR RANCH. How will this use be differentiated from STRR/CWH rentals in applicability, permit approval and enforcement?

ID	Section
Maura@Walsh-CopelandConsulting.com Date:8/23/2021	
#3323	4.03.04 Guest Farm or Ranch
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	This use needs further defined and standards. This was a carryover from existing definitions that had no additional standards. More to come.
#3079	4.03.04 Guest Farm or Ranch
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.03.03 Guest Farm B. Size. Rooms are rented, not leased. This illustrates the lack of clarity and accuracy in many sections of the text. Given the lack of many performance standards, I suggest that a SPEX be required.
#10930	4.03.03 Campgrounds
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.03.03.E CAMPGROUNDS: Setbacks for Level 1 should be 250 feet, Level II should be 300 feet, Level III should be 400 feet. The activity around a campground is such that these much higher setbacks are required to buffer the neighboring properties.
#10929	4.03.03 Campgrounds
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.03.03.C.b CAMPGROUNDS: The minimum lot size for Level 1 should be 50 acres, Level 2 should be 100 acres. This allows for proper setbacks and proper layout of the use.
#10928	4.03.03 Campgrounds
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.03.03 CAMPGROUNDS. Can/will a requirement be included to provide public multi-use trails that could link to Linear Parks and Trails?
#10871	4.03.03 Campgrounds
By: Maura Walsh-Copeland Tags: zoc	"3.06.03 CAMPGROUNDS. In addition to JLMA-20, special exception review and approval should also apply to the use in the MDOD Overlay. Should not be allowed in the MDODs without a Special Exception permit, along with

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:7/9/2022</p>	<p>Environmental Impact Study, and review by relevant agencies overseeing Emergency Services, Traffic, Health. Campgrounds pose a particular challenge to environmentally sensitive mountain forests: septic handling, water access, habitat loss, night sky, pollution, trash, traffic, fire hazard. 2022 ROUND 3 INPUT: Require Campgrounds to be not permitted or at minimum Special Exception in MDOD."</p>
#9792	4.03.03 Campgrounds
<p>By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022</p>	<p>C. 6. Address lighting in more detail, such as "lighting must be focused only downwards."</p>
#9791	4.03.03 Campgrounds
<p>By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022</p>	<p>C. 4. "Recreational area" is not defined. Suggest doing so.</p>
#6277	4.03.03 Campgrounds
<p>By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021</p>	<p>3.06.03.03 Campgrounds/glamping: Intensity of use? Is this allowed on the same parcel as STR? Screen, noise, lighting and setbacks need addressing. Note question to parking in parking section.</p>
#3754	4.03.03 Campgrounds
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/5/2021</p>	<p>3.06.03.03 CAMPGROUNDS. Can/will a requirement be included to provide public multi-use trails that could link to Linear Parks and Trails?</p>
#4339	4.03.03 Campgrounds
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021</p>	<p>Campgrounds require a SPMI or SPEX depending on the district. Since not all sites may be adjacent to, or be able to offer public multi-use trails, the items for consideration can be revised to add these, in the SPEX procedures section. Current language has the following items to consider that are related, and revisions could be made to incorporate this idea: "Whether the proposed special exception at the specified location will contribute to or promote the welfare or convenience of the public. Whether the proposed special exception can be served adequately by public utilities and services, roads, pedestrian connections and other transportation services and, in rural areas, by adequate on-site utilities."</p>

ID	Section
#3135	4.03.03 Campgrounds
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03.03.J CAMPGROUNDS. NOISE: Section 5.12B should be applied if it is similar to old 5.652B. Open until added & reviewed
#3316	4.03.03 Campgrounds
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Though Chapter 5: Development Standards are still being drafted, the current language in 5-652.B has been copied into the new 5.12
#3134	4.03.03 Campgrounds
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03.03.E CAMPGROUNDS: Setbacks for Level 1 should be 250 feet, Level II should be 300 feet, Level III should be 400 feet. The activity around a campground is such that these much higher setbacks are required to buffer the neighboring properties.
#3318	4.03.03 Campgrounds
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	The current language is carry-over language. We have considered changing the thresholds, however at this time, staff supports the draft language.
#3133	4.03.03 Campgrounds
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03.03.C.b CAMPGROUNDS: The minimum lot size for Level 1 should be 50 acres, Level 2 should be 100 acres. This allows for proper setbacks and proper layout of the use.
#3319	4.03.03 Campgrounds
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	The current language is carry-over language. We have considered changing the thresholds, however at this time, staff supports the draft language.
#3132	4.03.03 Campgrounds

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.03.03. CAMPGROUNDS. In addition to ""service buildings,"" there should be reference to other ""structures."" Specifically, is this use intended for ""tents (as indicated/implied in D.1.a) or small cabins? If the latter, the line between ""campground"" and ""STRR"" could be easily crossed without better definition. 3.06.03.03.C.2 CAMPGROUND: Maximum campground stay by camper should be listed as no more than 30 days."
#3320	4.03.03 Campgrounds
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	good point. we will revise to avoid unintended consequences. Needs further follow up. Current campground definition includes rustic cabins and shelters. Staff will work with the STTR ZOAM PM to evaluate the intent of campgrounds vs STTR.
#2962	4.03.03 Campgrounds
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/19/2021	D. 1. Size of use: it is not clear whether this is referring to individual structures or the total of all structures.
#3321	4.03.03 Campgrounds
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	we will clarify. added "cumulative" in the text and "all" structures to the table.
#10927	4.03.02 Camp, Day and Boarding
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.03.02.C CAMP DAY AND BOARDING: Lot areas of this type of camp should be 20 acres and not 15 to better handle the use
#9790	4.03.02 Camp, Day and Boarding
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Typ in C. 2. ("principal" is correct.)
#9789	4.03.02 Camp, Day and Boarding
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com	Camps: I do not see this in the Uses table.

ID	Section
Date:4/23/2022	
#4235	4.03.02 Camp, Day and Boarding
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/16/2021	Typo--in 3.06.03.02 Table one under Scope of Use/Campers: should be boarders
#4336	4.03.02 Camp, Day and Boarding
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	got it. thank you.
#3742	4.03.02 Camp, Day and Boarding
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	WHOA! again. What's the minimum size lot that can have a camp? On larger lots, how many camps would be permitted?
#3905	4.03.02 Camp, Day and Boarding
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/8/2021	Minimum size is 15 acres, up to 250 campers for 100+acres or SPEX for >250 campers.
#3530	4.03.02 Camp, Day and Boarding
By: John Merrithew Tags: zoc Date:8/29/2021	The number of 'by right' day campers/boarders seems low. Is there a basis for the number?
#3616	4.03.02 Camp, Day and Boarding
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	This is the number identified in the current ordinance. We will consider an increase to a number that is appropriate.
#4337	4.03.02 Camp, Day and Boarding
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	The current language is carry-over language. We have considered changing the thresholds, however at this time, staff supports the draft language.

ID	Section
#3131	4.03.02 Camp, Day and Boarding
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03.02.G CAMP DAY AND BOARDING: Noise. Section 5.12B should be applied if it is similar to old 5.652B. Open until added & reviewed.
#3312	4.03.02 Camp, Day and Boarding
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Though Chapter 5: Development Standards are still being drafted, the current language in 5-652.B has been copied into the new 5.12
#3130	4.03.02 Camp, Day and Boarding
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03.02.C CAMP DAY AND BOARDING: Lot areas of this type of camp should be 20 acres and not 15 to better handle the use
#3313	4.03.02 Camp, Day and Boarding
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	The current language is carry-over language. We have considered changing the thresholds, however at this time, staff supports the draft language.
#3078	4.03.02 Camp, Day and Boarding
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	3.06.03.01 and .02 Camps Suggest requiring fire and health departments' approval. Suggest a one-story height limit for all structures.
#3314	4.03.02 Camp, Day and Boarding
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	All permits are evaluated to assess whether they need to be sent to the Health Department and Fire/Rescue. All zoning permits for a parcels served by private well / septic receive HD review. All commercial uses, which would include Camp, Day and Boarding, receive Fire/Rescue review.
#2961	4.03.02 Camp, Day and Boarding
By: Kevin Ruedisueli Tags: zoc	3.06.03.02 C. stipulates a minimum of 20 acres for less than 15 campers, yet requires only 15 acres for up to 30 campers. Something is wrong here.

ID	Section
kevinruedisueliZOC@gmail.com Date:8/19/2021	
#3315	4.03.02 Camp, Day and Boarding
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	noted. will standardize and consider appropriate size as with comment #3130
#4338	4.03.02 Camp, Day and Boarding
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	Language corrected, it does not specify a minimum of 20 acres now.
#11109	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"BED & BREAKFAST INN. Use protections are INCONSISTENT in policy areas/place types with proposed designations: -- TPA: Permitted in TLN-10, TLN-3, TLN-1, TSN, and Modified SPEX in JLMA-1, -2 & -3. -- RPA: Permitted in RN, RS, RC, RV, VC, VAR, but Modified SPEX in Village Residential (VR). Use requires separation, additional standards for "events" on site or Modified designation in all areas to be CONSISTENT. Applications for B&B Inn are being used to establish an Event Center "by-right" to circumvent Banquet Event Facility use requirements. Establishments are not being used as B&B, rather are primarily being used for events without regard to size requirements. See case study evidence: Barn at Willow Brook, Page 22: https://loudouncoalition.org/wp-content/uploads/2020/04/ATTACHMENT-RuralUses-Chronologies.pdf"</p>
#11107	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>RURAL RESORTS. Performance standards for Country Inn and Rural Resorts are INCONSISTENT: Hours of operation, noise, water/wastewater, application requirements. This must be fixed during ZOR. https://loudouncoalition.org/wp-content/uploads/2020/04/RuralZoningComparison-3-15-2017.pdf</p>
#10934	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.06.03.1.G.6. RURAL RESORTS. States that Open Space. A minimum of 75% of the site must remain in an agricultural, forestry, open space, or historic preservation use. Recreational uses are customarily incidental and subordinate to the rural resort permitted in the open space area may include: swimming pools and related facilities, boating facilities, tennis and other sports courts, equestrian</p>

ID	Section
	facilities, picnic areas, golf courses and related facilities, ballfields, children's play equipment and passive recreation facilities. Driveways and parking areas supporting these recreational facilities may also be located in the open space area. 2022 Round 3 Input: A reasonable person would not assume that driveways and parking lots are ""preserved open space."" Its also a stretch to say that tennis courts and swimming pools are open space."
#10926	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.03.01.G6 RURAL RESORT: Can the Uses on open space be more limited to avoid destroying purpose of open space?
#10925	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.03.01.G. RURAL RESORT: Can/will a requirement be included to provide public multi-use trails that could link to Linear Parks and Trails?
#10923	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.03.01.B BED AND BREAKFAST HOMESTAY, INN, COUNTRY INN AND RURAL RESORT LODGING. Section needs to also add/define the PURPOSE (as lodging) before Approval to avoid applications for B&B's filing to hold events vs. intent of lodging (as lesser restriction ""path"" than Event Center). Applications should verify (public information) or require affirmative oath with penalties if statements are later found to be false and/or falsified by applicants. Bed and breakfast Inn must be actively advertised, and records must be available to show that it is actively being rented, not being used only to hold large events (e.g., weddings) and parties."
#10922	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.03.01.1 BED AND BREAKFAST PRIVATE PARTY CHART: The number of attendees and number of private parties allowed for B&B Homestay and B&B Inns needs to be expanded to allow for differences per acreage since the current chart allows for too much use on smaller properties. Would recommend the following: 5 acres or less 21-75 attendees and 5 maximum private parties; 6-19 acres 21-100 attendees and 10 party maximum per year."

ID	Section
#10921	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.03.01 BED AND BREAKFAST HOMESTAY. Item 7. This type of statement is listed under each type of overnight accommodation: Historic Property. "" ...Any expansion or enlargement of structure shall not exceed 15% of the total floor area existing prior to January 7, 2003, unless a greater expansion is approved by Minor Special Exception, pursuant to Section 7.09."" Can each ""Historic Property"" bullet point include this language: ""Alteration to the original footprint of the historic structure must be relevant to the setting and context-sensitive in design, such as structural additions to a country inn must utilize appropriate rural design, in keeping with the surroundings whether rural in nature or located within an historic main street village."" (Also stated in 03.06.04.02 ANTIQUE SHOP, and in 03.06.04.02 AUCTION HOUSE, and in 03.06.04.19 TEAHOUSE, and in 3.06.05.02 AGRICULTURAL CULTURAL CENTER, 3.06.05.04 ARBORETUM, 03.06.05.09 CROSS-COUNTRY SKI, 3.06.05.11 FARM BASED TOURISM) 2022 ROUND 3 INPUT: Definition of ""historic"" requested by multiple groups (REDC, VHPA, Heritage Commission, LCPCC members groups)"
#10920	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.03 LODGING. LANDSCAPING/BUFFERING/SCREENING -- All. The statement requiring ""outdoor private party areas shall . . . screen outdoor private party areas, regardless of the size of adjacent property."" Unless the new Section for Landscaping/Buffering/Screening RETAINS this requirement it should be put back within the use specific standards to address known issues with large events held at B&Bs.All regulations for related to Special Events, set-backs, buffering, lighting, and site plans IF ALLOWED IN THE MDODs, must be the same as Brewery, Limited."
#10919	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.03 LODGING. The uses in this category range from High to Medium to Low intensity. Regulations for Hours of Operation are inconsistent/MISSING for Rural Resorts, Campgrounds, and Camp, Day and Boarding. Scale levels should be applied to Rural Resorts Attendance to be comparable with Campgrounds, Cap, Day and Boarding, per 2021 Rural Use Zoning Comparison Matrix (https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-INTENSITY-SORT-RuralZoningComparison.pdf).
#10918	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.03 LODGING. Many Round 1 and Round 2 ZOR Focus Group and Zoning Audit input requests were not included in the current ZOR DRAFT TEXT. As indicated to Staff in Spring 2020 and Spring 2021 the input would be restated during ZOC review, and will also be included in Round 3 if DRAFT Text is not revised. Input was consolidated from numerous organizations, all currently

ID	Section
	published on the ZOR LOLA public input site. If Staff or WSP Consultants require additional evidence, cases, complaints submitted via LEx and other methods, copies can be sent to James David and/or ZORewrite@loudoun.gov."
#10917	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.06.03 LODGING. NOISE regulations only stipulating hours of operation for outdoor music/noise are insufficient for B&B's conducting weddings and large events. A noise regulation standard -- that is enforceable -- should be included. There is a known lack of clarity between noise regulations between Zoning Ordinances and Codified ordinance (Sheriff enforcement) (Whom to call, When they come out, How measurements are taken, enforcement resolution).
#10870	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.03.01.G RURAL RESORTS. IF Allowed in MDODs, minimum acreage must be 50 acres, and accommodations for up to 20 sleeping rooms only, regardless of acreage, so as to preserve environmentally sensitive mountain forests. All permit application requirements, set backs, buffering, lighting, Special Event regulations must be devised accordingly. 2022 ROUND 3 INPUT: Require Rural Resorts to be not permitted or at minimum Special Exception in MDOD."
#10869	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.03.01.B BED AND BREAKFAST HOMESTAY, INN, COUNTRY INN AND RURAL RESORT LODGING. APPROVAL. Change from sketch plan to site plan is appropriate to ensure the health, safety and welfare of residents and patrons. Thank you. 2022 ROUND 3 INPUT -- DRAFT TEXT: States that approval requires ""sketch plan or site plan, as applicable, fo the proposed use"" 1. This text was changed by the former DPZ Director AFTER ZOC review without discussion 2. There is no reference in any B&B, Inn, Resort WHICH and/or WHEN a sketch plan versus site plan is required. Need clarification and confirmation."
#9788	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	G. 6. The uses that are mentioned are actually Outdoor Recreation and should be dealt with as such. If you cannot think of other resort activities which aren't Outdoor Recreation, then delete this use. As I see it, Rural Resort should feature passive activities like spas, while Outdoor Recreation picks up active activities.

ID	Section
#9787	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	G. 1. Why is this permitted in certain buffer areas?
#9786	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Music: None after 10PM except Friday and Saturday which is okay at midnight. Then none until 11:00 AM
#9785	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	f. 1. Food service. This is an example of a loophole that a promoter could exploit: Build a restaurant with 99 seats along with one or two living suites that could be marketed as a B&B. This would be an easy way for someone to try to sneak in a pure restaurant. That's why country inns should require a SPEX, nor just a M.
#9784	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	2. f. 1. Say "food service may be provided ONLY for overnight guests..."
#9783	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	F. 1. illustrates the need for precision everywhere in the ZO: Does "serves more than 100 persons" mean at one time or cumulative for a day? In this case, the solution is to say "100 seats."
#9782	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	C. 2. End operations at 10:00 PM weeknights, midnight only for Friday and Saturday.

ID	Section
#9781	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Why allow ANY times the max number of guests can be exceeded? Worse, there should be an absolute cap on number of guests in any event.
#9780	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Size table - all the numbers of attendees are too large. Suggest halving those numbers.
#6276	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Jeff Browning for REDC Tags: zoc jeff@browningequipment.com Date:11/29/2021	3.06.03.01 Lodging: Where are Homestays permitted? This needs to be stated.
#4234	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/16/2021	I support Maura Walsh-Copeland's comments in 3.06.03.01
#3780	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"Aug. 25th Comments RE: ZOAM-2015-0006. B&B INN/COUNTRY INN STANDARDS – Per Item 10a, BOS/TLUC report April 19, 2018-ROIA for ZOAM-2015-0006, Principal structure requirements were to be reviewed. How have the following changes been incorporated in the Draft Text? Although the Revised 1993 Zoning Ordinance continues to define B&B Homestay as a private owner occupied dwelling, it does not expressly contemplate a principal structure for either a B&B or Country Inn, but instead defines these uses as a business operated in one or more structures. This has inadvertently allowed B&B Inn and Country Inn uses to build up to 10 and 40, respectively, individual structures for overnight accommodations and not be required to provide a primary or principal structure that is typically envisioned as being the inn itself. Amendment clarifies the expected components of a B&B Homestay, B&B Inn, and Country Inn, to include requiring a primary structure for overnight accommodations, common spaces, and dining functions. Source of Proposed Amendment*: Staff

ID	Section
	recommends to clarify the required components of such uses to ensure consistency with community expectations."
#4334	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	we will further review and consider appropriate language to address this issue.
#3753	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/5/2021	3.06.03.01.G. RURAL RESORT: Can/will a requirement be included to provide public multi-use trails that could link to Linear Parks and Trails?
#4335	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	staff is looking into this.
#3752	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/5/2021	"3.06.03.01 G. RURAL RESORTS 3. Setbacks references ""active recreational areas"", and 3.06.03.01 G. RURAL RESORTS 6. Open Space lists permitted recreational uses including ""passive recreation facilities"". However, Table 3.03-1 does not define passive recreation uses. Active recreation uses are defined within the use of Arts, Entertainment, and Recreation under the Civic Space use definitions. This definition within definition, and omission of defining a use (in this case passive recreation), makes it cumbersome and difficult to know what uses are actually being permitted. The active recreation use definition listed under Civic Space is ""recreation uses required constructed facilities for organized activities, such as playing field, ball courts, and playgrounds"" which would imply that passive recreation uses are uses that do not require constructed facilities, so what is a passive recreation facility (as mentioned above)?"
#3903	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/8/2021	The definition for Passive Recreational Uses that is carried over is: Passive recreational uses: Recreational uses (such as hiking, nature observation, and picnicking) not requiring constructed facilities, but making use of areas which are

ID	Section
	largely left in their natural state except for basic facilities as bathrooms, benches, picnic tables, and trails.
#3751	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/5/2021	"3.06.03.01 BED & BREAKFAST HOMESTAY, BED & BREAKFAST INN, COUNTRY INN, RURAL RESORTS. Why is there not a definition of passive recreation uses in Table 3.03-1 Use Classifications and Definitions? "
#3904	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/8/2021	Staff will evaluate what definitions should be in 3.03 and what should be in Chapter 11 to remain consistent.
#3129	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03.01.G6 RURAL RESORT: Can the Uses on open space be more limited to avoid destroying purpose of open space?
#3128	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03.01.G RURAL RESORTS. IF Allowed in MDODs, minimum acreage must be 50 acres, and accommodations for up to 20 sleeping rooms only, regardless of acreage, so as to preserve environmentally sensitive mountain forests. All permit application requirements, set backs, buffering, lighting, Special Event regulations must be devised accordingly.
#3300	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Limitations noted. Is the suggestion to make it a SPEX use in the MDOD?
#3127	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03.01.F COUNTRY INN. The change to minor special exception review and approval in ARN, ARS and A-3 is appropriate to ensure HS&W of residents and patrons.
#3301	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	good
#3126	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.03.01.D5 B&B HOMESTAY/B&B INN: Is the 5.12.B Noise section going to be similar to the current 5-652.B Noise Section? If yes, section 5.12B should be added to this area. The review of this section will remain open pending a review of 5.12B. 3.06.03.01.E5 B&B INN NOISE: Section 5.12B should be applied here if it is similar to old 5.652B. Open until added and reviewed 3.06.03.01.F6 COUNTRY INN. NOISE: Section 5.12B should be applied here if it is similar to old 5.652B. Open until added and reviewed 3.06.03.01.G.8.g RURAL RESORTS NOISE: Section 5.12B should be applied here if it is similar to old 5.652B. Open until added/reviewed"
#3125	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03.01.B BED AND BREAKFAST HOMESTAY, INN, COUNTRY INN AND RURAL RESORT LODGING. APPROVAL. Change from sketch plan to site plan is appropriate to ensure the health, safety and welfare of residents and patrons. Thank you.
#3303	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	noted. update: it has been changed to site plan.
#3123	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Maura Walsh-Copeland Tags: zoc	"3.06.03.01.B BED AND BREAKFAST HOMESTAY, INN, COUNTRY INN AND RURAL RESORT LODGING. Section needs to also add/define the PURPOSE (as lodging) before Approval to avoid applications for B&B's filing to hold events

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:8/23/2021</p>	<p>vs. intent of lodging (as lesser restriction ""path"" than Event Center). Applications should verify (public information) or require affirmative oath with penalties if statements are later found to be false and/or falsified by applicants. Bed and breakfast Inn must be actively advertised, and records must be available to show that it is actively being rented, not being used only to hold large events (e.g., weddings) and parties."</p>
#3304	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021</p>	noted
#3122	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021</p>	<p>"3.06.03.01.1 BED AND BREAKFAST PRIVATE PARTY CHART: The number of attendees and number of private parties allowed for B&B Homestay and B&B Inns needs to be expanded to allow for differences per acreage since the current chart allows for too much use on smaller properties. Would recommend the following: 5 acres or less 21-75 attendees and 5 maximum private parties; 6-19 acres 21-100 attendees and 10 party maximum per year. "</p>
#3121	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021</p>	<p>"3.06.03.01 BED AND BREAKFAST HOMESTAY. Item 7. This type of statement is listed under each type of overnight accommodation: Historic Property. "" ...Any expansion or enlargement of structure shall not exceed 15% of the total floor area existing prior to January 7, 2003, unless a greater expansion is approved by Minor Special Exception, pursuant to Section 7.09."" Can each ""Historic Property"" bullet point include this language: ""Alteration to the original footprint of the historic structure must be relevant to the setting and context-sensitive in design, such as structural additions to a country inn must utilize appropriate rural design, in keeping with the surroundings whether rural in nature or located within an historic main street village."" (Also stated in 03.06.04.02 ANTIQUE SHOP, and in 03.06.04.02 AUCTION HOUSE, and in 03.06.04.19 TEAHOUSE, and in 3.06.05.02 AGRICULTURAL CULTURAL CENTER, 3.06.05.04 ARBORETUM, 03.06.05.09 CROSS-COUNTRY SKI, 3.06.05.11 FARM BASED TOURISM)"</p>
#3306	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021</p>	Historic bldg language has been moved.

ID	Section
#3077	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	G. Rural Resort G.6. Golf courses? Swimming pools? Ball fields? Weak noise restrictions? Currently a rural resort requires a MPEX in ARN and ARS. Insanity!!! This absolutely should require a SPEX at a minimum. I'd much prefer to delete it as a permitted use so that a ZOAM is required. A SPEX is required for a large camp, which doesn't allow such uses, so logically a SPEX would be the minimum standard for a rural resort. Lansdowne approximates the character of a rural resort. Would we ever want to allow a Lansdowne to plo down in western Loudoun without BoS approval and extensive public input?
#3076	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	ZOC should have a good discussion about what a country inn could be and how one should be restricted. Other vague uses also need solid discussion - rural retreats is an example.
#3308	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	rural resort replaces rural retreat
#3075	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/23/2021	F. Country Inn F.1.a. There really needs to be a maximum size for a country inn!!! F.1.b. allows multiple structures. This was misused on Route 9 to building a multi-structure on a by-right basis. Suggest requiring a SPEX if there are to be multiple buildings. F.2.f. The limits on restaurant size are almost meaningless: On a 20-acre site with a .04 FAR, the inn could be 35,000 sf and the restaurant could be 17,000 sf. This would be a huge restaurant. I suggest a maximum restaurant/prep size of 6,000 sf regardless of the size of the lot. F.6. Noise. Use the same restrictions as for the B&B's: No outdoor music between 11PM and 10AM on weekends and 10PM to 10AM weekdays. A country inn can be a huge project with many impacts on the county. They are suggested to be by-right or require a MPEX. I suggest a SPEX for country inns given the potential consequences. Uses like this are why my concept of "sunset zoning" is wise.
#3074	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com	3.06.03.01 B&B et seq B. Shouldn't Health Department approval also be required? C. Why allow any parties above the maximum???

ID	Section
Date:8/23/2021	E. B& B Inn can have up to 10 rooms. This suggests purpose-built buildings, not use of a home. I would delete this category and increase the maximum number of rooms in B&B Homestay from 4 to 6. Subparagraph 'd' in B&B Homestay and 'f' in B&B Inn forbids food service. I suggest also forbidding the operator from providing alcohol.
#3311	4.03.01 Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, and Rural Resorts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	The HD approval is required for all zoning permits. We will ensure the references are consistent. The private party maximum is on a daily basis, versus a by-right number of times that may exceeded per year. This mirrors the special event permits. Noted re: providing alcohol.
#3779	4.03 Lodging
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.06.03 LODGING. The uses in this category range from High to Medium to Low intensity. Regulations for Hours of Operation are inconsistent/MISSING for Rural Resorts, Campgrounds, and Camp, Day and Boarding. Scale levels should be applied to Rural Resorts Attendance to be comparable with Campgrounds, Cap, Day and Boarding, per 2021 Rural Use Zoning Comparison Matrix (https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-INTENSITY-SORT-RuralZoningComparison.pdf).
#3902	4.03 Lodging
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/8/2021	Thank you, this matrix is helpful.
#3120	4.03 Lodging
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.03 LODGING. NOISE regulations only stipulating hours of operation for outdoor music/noise are insufficient for B&B's conducting weddings and large events. A noise regulation standard -- that is enforceable -- should be included. There is a known lack of clarity between noise regulations between Zoning Ordinances and Codified ordinance (Sheriff enforcement). NOW IS THE TIME with ZOR to make this correction.
#4333	4.03 Lodging
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	All Use-Specific Standards will be subject to 5.12. If the comment is universal, then we'll discuss during development standards.
#3119	4.03 Lodging

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.03 LODGING. LANDSCAPING/BUFFERING/SCREENING -- All. The statement requiring ""outdoor private party areas shall . . . screen outdoor private party areas, regardless of the size of adjacent property."" Unless the new Section for Landscaping/Buffering/Screening RETAINS this requirement it should be put back within the use specific standards to address known issues with large events held at B&Bs. All regulations for related to Special Events, set-backs, buffering, lighting, and site plans IF ALLOWED IN THE MDODs, must be the same as Brewery, Limited."
#3118	4.03 Lodging
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.03 LODGING. Many Round 1 and Round 2 ZOR Focus Group and Zoning Audit input requests were not included in the current ZOR DRAFT TEXT. As indicated to Staff in Spring 2020 and Spring 2021 the input would be restated during ZOC review, and will also be included in Round 3 if DRAFT Text is not revised. Input was consolidated from numerous organizations, all currently published on the ZOR LOLA public input site. If Staff or WSP Consultants require additional evidence, cases, complaints submitted via LEx and other methods, copies can be sent to James David and/or ZORewrite@loudoun.gov. "
#10916	4.02.10 Tenant Dwellings
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.06.02.10.B2 TENENT DWELLING: Placing tenant dwelling on open space should not be a by right decision. It should require some type of approval by the county to avoid harm to the open space purpose. Staff response: ""noted."" DRAFT TEXT: 2. Open Space Parcels. Tenant dwellings on open space parcels are only allowed in the A-3, ARN, ARS, and TLN districts. a. One tenant dwelling shall be permitted on parcels with at least 25 acres (by right)"
#9779	4.02.10 Tenant Dwellings
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	As written, it would seem that a 10-acre parcel could have a principal structure, an accessory dwelling, a guest house, a seasonal labor dormitory and a tenant dwelling. (Not to mention ag buildings.) That's crazy. Suggest some way of limiting total non-ag square footage on a parcel, or limiting a parcel to only one of these ancillary uses.
#9778	4.02.10 Tenant Dwellings
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	C. 4. Suggest allowing INDOOR home occupations only.
#6275	4.02.10 Tenant Dwellings
By: Jeff Browning for REDC	3.06.02.08 Tenant Dwelling:

ID	Section
Tags: zoc jeff@browningequipment.com Date:11/29/2021	Why are sanitary facilities removed? Need at least a central facility of appropriate size. Number of seasonal labor should not need SE. This is too costly for farmers.
#3587	4.02.10 Tenant Dwellings
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/1/2021	Is the reference to open space lots referring to village and cluster conservation lots? Why would we allow housing on an open space lot?
#3613	4.02.10 Tenant Dwellings
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	This is carryover language from the current ordinance. Staff will discuss its appropriateness in the draft ordinance.
#3420	4.02.10 Tenant Dwellings
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	If we want to set a total limit of 4/ parcel B1. seems to contradict that. For some of our larger parcels the rules in B1 are a better fit. 1/25 acres continues to be used and I'm not sure why when we regulate in 20 acre intervals for the parcel, consider changing to match.
#3614	4.02.10 Tenant Dwellings
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	Yes, we can consider making this revision.
#4332	4.02.10 Tenant Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	The current language is carry-over language. We have considered changing the thresholds, however at this time, staff supports the draft language.
#3117	4.02.10 Tenant Dwellings
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.02.08.B2 TENENT DWELLING: Placing tenant dwelling on open space should not be a by right decision. It should require some type of approval by the county to avoid harm to the open space purpose.
#3012	4.02.10 Tenant Dwellings

ID	Section
By: John Merrithew Tags: zoc Jm@loudoun.gov Date:8/23/2021	Why would tenant houses not have to meet the same standards as guest house? Suggest they be consolidated.
#3295	4.02.10 Tenant Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	agreed, consolidation is being considered.
#3008	4.02.10 Tenant Dwellings
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/21/2021	Tenant dwellings, C.4. Hoe occupation by tenants. I would forbid child care or any form of school.
#3296	4.02.10 Tenant Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	3.06.04.07.B.3 - child care must be from a principle dwelling. 3.06.05.16.B.3 - in ARN & ARS, schools of any size require a SPEX
#3007	4.02.10 Tenant Dwellings
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/21/2021	C.6. allows 4 tenant dwellings/parcel. This seems to conflict with the limits in A.!.
#3297	4.02.10 Tenant Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	noted With a large enough parcel, it can meet the base district regulations, have enough acreage per 3.06.02.08.B.1.a, and still reach the maximum of 4.
#3006	4.02.10 Tenant Dwellings
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/21/2021	B.2. What is an "open space parcel"?
#3298	4.02.10 Tenant Dwellings

ID	Section
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021</p>	<p>Open Space: Areas of trees, shrubs, lawns, grass, pathways and other natural and man-made amenities not within individual building lots, (except in rural village and Countryside Village developments), set aside for the use and enjoyment of residents, visitors and other persons, unoccupied by buildings or facilities unless related to recreational activities and in the TR and JLMA districts HOA facilities, and accessible to and adequate for persons and functions it is designed to serve. Lot coverage in the open space shall be limited to 0.01 of the lot. Generally, open space is intended to provide light and air and is designed for either scenic or recreational purposes. For the purpose of this Ordinance, open space shall include and be qualified as active recreation space, common open space, and dedicated open space.</p> <p>a. Open space, active recreation: That open space that is designed for recreational purposes, to include, but not to, be limited to such uses as ballfields, multi-purpose courts, swimming pools, tennis courts, golf courses, play lots and playgrounds, camping, picnicking, boating, fishing, equestrian activities, walking and biking trails, and activities incidental and related to the foregoing. (In the TR and JLMA districts, these recreational facilities may include HOA facilities.) Recreational facilities may be open to the public for a fee, provided the intent of the open space requirements is maintained. Examples of acceptable for-fee facilities include golf courses and sports pavilions where such facilities are utilized and enjoyed by the development but that must secure outside users for economic viability.</p> <p>b. Open space, common: Land within, or related to, a development not individually owned or dedicated for public use which is designed or intended for the common use or enjoyment of the residents of the development and may include such complementary structures and improvements as are necessary and appropriate. In only the Planned Development Housing (PD-H) Zoning District, uses of common open space may also include a dog park provided that the following conditions are met: 1) the dog park is non-commercial in nature; and 2) the homeowners' association (HOA) for such PD-H Zoning District owns and operates the dog park and owns the common open space upon which the dog park is located. Such dog park may be open to the public for a fee, provided the intent of the open space requirements is maintained.</p> <p>c. Open space, dedicated: All open space which is to be dedicated or conveyed to the County or an appropriate public agency, board, or body for public use as open space. For the purposes of this</p>

ID	Section
	definition, twenty-five percent (25%) of all dedicated school sites shall be considered as dedicated open space
#2960	4.02.10 Tenant Dwellings
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/19/2021	Similar to my question on Accessory Dwellings, why the 25-acre increment instead of an increment related to zoning district lot sizes? This 25-acre figure was also listed elsewhere.
#3669	4.02.10 Tenant Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	The current language is carry-over language. We have considered changing the thresholds, however at this time, staff supports the draft language.
#9880	4.02.09 Multifamily Dwelling Units
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:4/25/2022	3.06.02.09 and .08 are district specific requirements as opposed to use specific requirements. As such I would recommend they be relocated to Chapter 2 along with other district standards.
#9776	4.02.09 Multifamily Dwelling Units
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	E. 1. is hard to understand and should be rewritten. This is probably handled elsewhere, but where do we see limits on height, size and density?
#9775	4.02.09 Multifamily Dwelling Units
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	A needs rewriting for clarity. (Stacked units on the ground floor seems a bit odd.)
#9774	4.02.08 Single-Family Dwelling Units
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Item A needs to be rewritten for clarity.
#10224	4.02.08 Single-Family Dwelling Units

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/15/2022	edited A
#9777	4.02.07 Seasonal Labor Dormitory
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Suggest a minimum of 10 or 20 acres before you can have a seasonal labor dormitory.
#4233	4.02.07 Seasonal Labor Dormitory
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/16/2021	3.06.02.07 Seasonal Labor Dormitory From the ZOC and staff comments, it's apparent that this section isn't really clear--what square footage is for an individual's personal space and what's for the group facility. I look forward to more clarity.
#4329	4.02.07 Seasonal Labor Dormitory
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	Staff will be considering revised language to provide clarity.
#3741	4.02.07 Seasonal Labor Dormitory
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	Whoa! The first provision should be how many of such dormitory uses are allowed on a lot. (The answer should be a sliding scale based on property size.)
#4330	4.02.07 Seasonal Labor Dormitory
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	The sliding scale, or number of dormitory uses permitted is found in 3.05.02.10 - Tenant Dwellings.
#3686	4.02.07 Seasonal Labor Dormitory
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/2/2021	The setbacks seem excessive. This is a residence. It should not have to be setback like a livestock operation

ID	Section
#4331	4.02.07 Seasonal Labor Dormitory
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	Reduced to 100' to be in line with Religious Housing - Level II.
#3638	4.02.07 Seasonal Labor Dormitory
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/1/2021	Considering that this is a dormitory arrangement, one presumes that there might not be individual rooms, but rather bunks. If that is the intention, then the 100 sf per laborer could work as a minimum. What is a normal number of seasonal laborers for a farm in the county?
#3646	4.02.07 Seasonal Labor Dormitory
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	Staff will research this and determine if the minimum square footage per laborer is appropriate as drafted.
#3419	4.02.07 Seasonal Labor Dormitory
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	This seems overall to be extremely minimal requirements for housing people. I would expect bathing/restroom facilities and septic requirements.
#3652	4.02.07 Seasonal Labor Dormitory
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	Staff will research this and determine if additional standards for housing facilities are appropriate. Bathing / restroom facilities were removed as reviewers determined this was covered in the IBC.
#3418	4.02.07 Seasonal Labor Dormitory
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	100 sqft/person housed is too small, consider increasing to 200.
#3650	4.02.07 Seasonal Labor Dormitory
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	As stated in Kevin's comment, staff will research this and determine if the minimum square footage per laborer is appropriate as drafted.

ID	Section
#3116	4.02.07 Seasonal Labor Dormitory
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.02.07.B.3 SEASONAL LABOR DORMITORY & 3.06.02.08.B.7 TENANT DWELLING. Why would "Sanitary and Bathing Facilities" requirement for Seasonal Labor Dormitory (and Tenant Dwellings) be removed? Wouldn't that mean than an empty barn could be used without confirming proper facilities?
#3289	4.02.07 Seasonal Labor Dormitory
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Review by the County Attorney's Office suggested deletion because it was redundant to the IBC regulations.
#3115	4.02.07 Seasonal Labor Dormitory
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.02.07.B.3 SEASONAL LABOR DORMITORY. How will the requirement that residents be employed be enforced or monitored? 3.06.02.07.D Seasonal Labor Dormitory: Should this area also adhere to 5.07.05? "
#3290	4.02.07 Seasonal Labor Dormitory
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	If this section remains, yes, the parking will need to meet the landscaping and screening requirements.
#3005	4.02.07 Seasonal Labor Dormitory
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/21/2021	MAJOR COMMENT Every bit of text needs to be scrutinized for precision and clarity. Here's an example of poor drafting: While I understand that seasonal labor dormitories are not to be greater than 2,500 sf in size, the draft sentence could be read as allowing a structure up to 2,500 sf per laborer housed. This might seem like nit-picking, but this will be a long-lasting document and it absolutely must be clear.
#3291	4.02.07 Seasonal Labor Dormitory
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	clarifying language added.
#3004	4.02.07 Seasonal Labor Dormitory
By: Charles Houston	Change minimum size to 150 or 200 sf

ID	Section
Tags: zoc CharlesHouston3@yahoo.com Date:8/21/2021	
#3292	4.02.07 Seasonal Labor Dormitory
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	changed.
#2967	4.02.07 Seasonal Labor Dormitory
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:8/20/2021	Try to consolidate group living like religious. Housing, seasonal dormitories, and others under one set of standards. The activity is the same. Should not repeat the use definition in the standards.
#3293	4.02.07 Seasonal Labor Dormitory
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	consolidation is being considered
#10473	4.02.06 Religious Housing
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/4/2022	Not sure religious housing is not just a group home or dormitory. Nonetheless, the lot sizes for religious housing are excessive. 30 to 40 spiritual people can probably live on a lot significantly smaller than 30 acres.
#9773	4.02.06 Religious Housing
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	The table scales the size of religious housing, by acreage. Scaling like this would be very helpful for many other uses, such as recycling centers, seasonal labor, utilities, etc.
#3740	4.02.06 Religious Housing
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	Agree with John M that the setbacks are too big.
#4328	4.02.06 Religious Housing

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	Setbacks were taken from 5-656, Convent or Monastery. Staff will continue to review appropriate setbacks and make uses comparable, however, currently staff supports the draft language.
#2966	4.02.06 Religious Housing
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:8/19/2021	These are pretty incredible setbacks and standards. Why are there such stringent and arduous standards? Also question why we need to refer to applicable standards in other parts of the ordinance? Are these uses not subject to the whole ordinance unless noted otherwise?
#3287	4.02.06 Religious Housing
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Setbacks and standards were taken from 5-656, Convent or Monastery. Can be adjusted as appropriate, and yes, subject to the whole ordinance.
#3739	4.02.05 Portable Dwelling/Construction Trailer
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	"Portable dwelling" and "Construction trailer" are very different animals. The text covers construction trailers. Portable dwellings should be a separate section...IF we wish to allow them at all.
#4327	4.02.05 Portable Dwelling/Construction Trailer
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	By definition: "A structure that is installed temporarily for use as a dwelling while a residence is being constructed."
#3089	4.02.05 Portable Dwelling/Construction Trailer
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:8/23/2021	Is there more to come in this section? Removal refers to only after completion of primary residence. Aren't there construction trailers for other, possibly commercial, uses? Such a small regulation like this makes me want to incorporate use-specific standards within the definitions.
#3286	4.02.05 Portable Dwelling/Construction Trailer
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	This was pulled from definitions and placed in use-specific standards because the definition described standards of use. That said, more standards are necessary for this section, and perhaps duplicating the standard in "Commercial/Mixed Use"

ID	Section
#12482	4.02.04 Manufactured Homes
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	Can the standards on size be reflective of the available bedrooms, rather than setting a single minimum size? Tiny homes are options that people want today. Why must they have wheels, axles, etc? Can't there be more latitude on that? Manufactured houses that are built in a factory and transported to a site are being made more affordably, and result in greater affordability for potential owners. This section should be amended to reflect the state of the market.
#9772	4.02.04 Manufactured Homes
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	B. 3: "Compatible" is vague. Please elaborate so this can be effective.
#4232	4.02.04 Manufactured Homes
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/16/2021	3.06.02.04 Manufactured Homes I understand that this is a carry-over. In updating this section, please consider reducing the design requirements per John's comments, as well as the need for wheels and minimum size. These may be an affordable housing option if they're factory-built and trucked to the site.
#3589	4.02.04 Manufactured Homes
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/1/2021	Still sounds like I won't be able to build my shipping container house. Too much design. Is it even legal to require certain building materials?
#3666	4.02.04 Manufactured Homes
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	noted. Staff will review and revise accordingly.
#3414	4.02.04 Manufactured Homes
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	I see that A is carryover language and agree it should be removed so standards apply in the rural areas as well. The way 4. is written it seems to preclude the use of a metal roof which is very popular and may fit in with other homes better.
#3667	4.02.04 Manufactured Homes

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Added metal roofing to the list, as metal can be non-reflective. Staff continues to support the carry-over language for greater flexibility with the excluded districts.
#3114	4.02.04 Manufactured Homes
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.02.04.A. MANUFACTURED HOMES. Why are manufactured homes in ARN, ARS, A-3 and TLN not subject to the standards? 3.06.02.04.B1 MANUFACTURED HOMES: Did you wish to limit size just to 900 sf or did you also want to limit to 19 feet wide?"
#3189	4.02.04 Manufactured Homes
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:8/23/2021	The applicability standard in A is language carried over from the current ordinance. The districts have been updated to reflect the revised zoning district names. B.1. has been revised to include "and a minimum of" 19 feet in width. This is also carryover language from the current ordinance.
#3071	4.02.04 Manufactured Homes
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:8/23/2021	Should we expand manufactured housing by allowed in other districts to promote affordable housing options? If they can be regulated with the same standards as SFD, why not expand the districts in which they are allowed?
#3113	4.02.04 Manufactured Homes
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:8/23/2021	Ignore my comment related to manufactured housing.
#3011	4.02.04 Manufactured Homes
By: John Merrithew Tags: zoc Jm@loudoun.gov Date:8/23/2021	There is too much design here. These should be regulated with the same standards as a SFD.
#3003	4.02.04 Manufactured Homes
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/21/2021	Manufactured Homes: These are permitted in ARN and ARS, so why don't these standards apply?

ID	Section
#3285	4.02.04 Manufactured Homes
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	This was carry over language from 5-620(I), however noted. Staff retains this to allow the existing flexibility in the excluded districts.
#9771	4.02.02 Guest Houses
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	I don't see 3.06.02.03, but art studios should be allowed in live/work dwellings.
#4231	4.02.02 Guest Houses
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/16/2021	3.06.02.02 There is no reference to how many guest houses may be permitted, whether by lot size or other consideration. I agree with John Merrithew's comment that policing the prohibition against renting guest houses seems unworkable.
#4325	4.02.02 Guest Houses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	Noted. We will follow up.
#3738	4.02.02 Guest Houses
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	Guest houses should be limited to 50% or 2,000 sf...maximum.
#4326	4.02.02 Guest Houses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	The current language is carry-over language. We have considered changing the thresholds, however at this time, staff supports the draft language.
#3529	4.02.02 Guest Houses
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov	B. & C. are redundant

ID	Section
Date:8/29/2021	
#3663	4.02.02 Guest Houses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	noted. Staff will review and revise accordingly.
#3456	4.02.02 Guest Houses
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:8/25/2021	-What is difference between "Guest House" and "Accessory Dwelling" ? - Based on definitions the ONLY difference is you can't use them for STTR, but it seems like anyone could call the structure an Accessory Dwelling rather than Guest House.....
#3664	4.02.02 Guest Houses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	noted. These could be considered for consolidation.
#3412	4.02.02 Guest Houses
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	Do we have any plans to regulate if the structure is being "rented" beyond neighbor complaints?
#3665	4.02.02 Guest Houses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Upon permitting, otherwise zoning enforcement generally does not conduct proactive enforcement.
#3002	4.02.02 Guest Houses
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/21/2021	Minor drafting comments: In B., change "must" to "may." Need clarity: In C., the last phrase (" or otherwise used as a separate dwelling." is very vague. Delete it or clarify it.
#2957	4.02.02 Guest Houses

ID	Section
By: John Merrithew Tags: zoc John.Merrithew@loudoun.gov Date:8/19/2021	Recommend any pre-existing guest house be permitted without regard for the floor area and footprint limits.
#2956	4.02.02 Guest Houses
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:8/19/2021	Guest houses are perfect STRR candidates. Allowing STRR might help protect some of these historic properties. Paragraph E could simply say eligible or listed on the VLR or NRHP. All other qualifications would meet the requirement.
#9770	4.02.01 Accessory Dwellings
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Accessory dwellings should not be more than 50% of the size of the principal structure.
#10221	4.02.01 Accessory Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/15/2022	The existing ZO is the less of 70% or 2500 sq ft. Staff did not identify a need to reduce this to 50%
#4230	4.02.01 Accessory Dwellings
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/16/2021	Has there been any analysis of the number of additional detached accessory and tenant houses would be possible based on these regulations? It would be good to know.
#4322	4.02.01 Accessory Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	No, there has not been a specific analysis. These proposed language is carry-over language and does not allow additional detached accessory dwellings versus the regulations today.
#3737	4.02.01 Accessory Dwellings
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	D makes little sense -- How can an accessory dwelling be located WITHIN a principal structure?

ID	Section
#3891	4.02.01 Accessory Dwellings
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/7/2021	This type of accessory dwelling would coexist with the principal dwelling within the footprint of the principal structure. Examples of this would be an accessory dwelling located within the basement or above an attached garage of a principal structure. The accessory dwelling would function separately from the principal dwelling and would have its own access.
#3736	4.02.01 Accessory Dwellings
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	3.06.02.01 C Suggest 1 accessory dwelling on lots up to 30 acres, 1 more (2 total) on lots larger than 30 acres, 1 additional dwelling for every 100 acres. Thus a 100 acre farm in ARN could have 3 accessory dwellings. That's enough and it matches the pattern here in the RPA.
#4323	4.02.01 Accessory Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	The current language is carry-over language. We have considered changing the thresholds, however at this time, staff supports the draft language.
#3735	4.02.01 Accessory Dwellings
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/4/2021	The permitted size of accessory dwellings is too big. Suggest the lesser of 50% of principal house or 2,000 sf.
#4324	4.02.01 Accessory Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/27/2021	The current language is carry-over language. We have considered changing the thresholds, however at this time, staff supports the draft language.
#3112	4.02.01 Accessory Dwellings
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.02.01.C ACCESSORY DWELLING. "Additional dwellings may be permitted by Special Exception f." What is "f"? 3.06.02.01.G. ACCESSORY DWELLINGS. Text for "G" is blank
#3160	4.02.01 Accessory Dwellings
By: Mark Holland Tags: staff mark.holland@loudoun.gov	"f" has been removed. G. references existing structures.

ID	Section
Date:8/23/2021	
#3111	4.02.01 Accessory Dwellings
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.02.01.E ACCESSORY DWELLING. A detached accessory dwelling is subject to all yard requirements applicable to the building principle dwelling where it is located.
#3171	4.02.01 Accessory Dwellings
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:8/23/2021	This should reference attached accessory dwellings. An accessory dwelling when located within or as part of the principal dwelling is subject to the same setbacks as that principal dwelling.
#3110	4.02.01 Accessory Dwellings
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	3.06.02.01.A.1. ACCESSORY DWELLINGS. The district name in the Use Matrix was changed/corrected to be "Agricultural Rural." Will this change be made consistent throughout this section?
#3277	4.02.01 Accessory Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Terminology will be standardized throughout.
#2958	4.02.01 Accessory Dwellings
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:8/19/2021	See comments on guest houses. Simplify exemption to apply to all pre-existing accessory units. Merge this use with guest houses. Standards are identical.
#3059	4.02.01 Accessory Dwellings
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:8/23/2021	Would it be reasonable to make Guest House a subsection of Accessory DU - noting that a second Accessory DU is permitted on the property if used as a Guest House (not operated for gain)? If Guest Houses and Accessory DUs have the same physically requirements, and the only difference is whether they can be rented. How do we regulate this?
#3278	4.02.01 Accessory Dwellings

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	Merging / consolidation is being discussed and considered.
#3657	4.02.01 Accessory Dwellings
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:9/1/2021	Noted. Staff will research and merge if appropriate.
#3001	4.02.01 Accessory Dwellings
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:8/21/2021	3.06.02.01 A.1. Minor suggestion: Should read "...a footprint of not more than 70% of the FOOTPRINT OF the principal structure..."
#2959	4.02.01 Accessory Dwellings
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/19/2021	3.06.02.01 C. Why are additional units allowed one per 25 acres instead of 20 acres?
#3279	4.02.01 Accessory Dwellings
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	This is carryover language from 5-613(F). Staff can consider reducing to 20 acres.
#10915	4.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.01.B PURPOSE AND APPLICABILITY, B. CONDITIONS. 2022 Round 3 Input: To be CONSISTENT in referencing other applicable and/or controlling regulations located in other chapters, there should be a reference to Chapter 5, Section 5.08 to inform ZO users in the future of the relationship. Without similar reference as exists for references to Chapter 7 herein, businesses and residents may not be aware of Chapter 5 requirements, thereby causing issues or avoidable complaints."
#10914	4.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc	"3.05.01.A PURPOSE AND APPLICABILITY: Add 'environmental' to the list of items being protected, with notation such as: "" and to protect the County's unique/sensitive environments"" as the General Plan dedicates Chapter 2 to

ID	Section
Maura@Walsh-CopelandConsulting.com Date:7/9/2022	those goals. Does a 'restrictive covenant' clause need to be included as a conformance item?"
#10861	4.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	DRAFT TEXT NOT YET RELEASED. "3.05.04.17 MOBILE VENDORS: Food trucks should be temporary and not permanent. Many high-intensity uses use them as permanent structures that detract from the site and do not comply with health department regulations for stationary restaurants . Other considerations: Connection to water hook up, Backflow protection, Disposal to private septic field or alt septic. Standard noise provisions should apply since some of these food trucks are noisy and if parked close to a neighboring property can be a problem."
#10860	4.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.01.A. USE-SPECIFIC STANDARDS PURPOSE AND APPLICABILITY. The ordinance provides no mechanism to consider or evaluate properties with more than one primary use in terms of scale (location, total acreage), and intensity impacts. 2022 Round 3 Input: Provide standards to evaluate and address multiple principle uses on a parcel to ensure compatible scale, use, intensity, character, and environmental protections, including, but not limited to, acres calculation, scale, intensity, hours of operation, parking calculations, quantity of events and attendees, setbacks, buffering, road access, noise, etc. Recommendation implements 2019 Comp Plan Policy 3, Strategy 3.1. Action B"
#10859	4.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	"3.05.01. USE-SPECIFIC STANDARDS PURPOSE AND APPLICABILITY. Intense uses in the ARS/ARN should be separated and implemented through an overlay district or sub-district to remove uses to implement 2019 GP polices for the protection of MDOD, LOD, FOD and VCOD overlay districts. -- There are 40+ districts in the UPA, SPA, TPA, and Legacy with their own Use Tables identifying permitted versus minor or special exceptions uses. These districts comprise approximately 105.7K acres or 33% of the 333.6K acres in Loudoun. -- In contrast, the RPA has 18 districts (JLMA 6, Village 10, Agricultural/Rural 2) in approximately 227.9K acres, or ~67% of total Loudoun with the bulk in the ARN/ARS districts. There is a fundamental inconsistency in applying the same list of Uses to the 2 largest districts in the County without regard to overlay district impacts. 2022 Round 3 Input: Establish a mechanism to implement the assignment of Uses in Use Tables by combination of Zoning District and existing Overlay District for protection of Mountainside, Limestone, Floodplain, River Stream Corridor Resource, and clarify residential versus commercial uses in Village Conservation Overlay Districts. "
#10858	4.01 Purpose and Applicability

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.05.01. USE-SPECIFIC STANDARDS PURPOSE AND APPLICABILITY. A ""tier"" or ""levels"" system based on intensity of the use should be considered, consideration should be given for properties with more than one primary use, and consider mechanism to exclude uses within existing overlay districts (e.g., MDOD, LOD, FOD, VCOD, etc.) 2022 Round 3 Input: Establish "tier" or "levels" system based on intensity of the use to be consistent and equitable with the application of "tiers" or "levels" for other existing Uses (e.g., B&B, Rural Resorts, Campgrounds, Farm Based tourism, Ag Support Uses, etc.). Recommendation implements 2019 Comp Plan Policy 3, Strategy 3.1, Action B"</p>
#10857	4.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.05.01. USE-SPECIFIC STANDARDS PURPOSE AND APPLICABILITY. There are inconsistencies within use tables that need to be corrected. Uses and use-specific standards within Agricultural Rural North (former AR-1) and Agricultural Rural South (former AR-2) districts need to be more clearly defined as to not create loopholes and zoning enforcement issues. 2022 Round 3 Input: Provide standardized use-specific standards, temporary use regulations for events, and performance standards requirements for similar or equivalent intensity uses. Standardization should include, but not limited to, noise, lighting, "traffic capacity, safe and adequate road access, number of employees, site design standards (e.g., land disturbance, buffering, use intensity, siting, and architectural features), and public health, safety, and welfare." (2019 GP Policy 3) Recommendation implements 2019 Comp Plan Policy 3, Strategy 3.1. Actions A, Strategy 3.2 Action A, "</p>
#10856	4.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.05.01. USE-SPECIFIC STANDARDS PURPOSE AND APPLICABILITY. There are inconsistencies within use tables that need to be corrected. Uses and use-specific standards within Agricultural Rural North (former AR-1) and Agricultural Rural South (former AR-2) districts need to be more clearly defined as to not create loopholes and zoning enforcement issues. 2022 Round 3 Input: Provide standardized use-specific standards, temporary use regulations for events, and performance standards requirements for similar or equivalent intensity uses. Standardization should include, but not limited to, noise, lighting, "traffic capacity, safe and adequate road access, number of employees, site design standards (e.g., land disturbance, buffering, use intensity, siting, and architectural features), and public health, safety, and welfare." (2019 GP Policy 3) Recommendation implements 2019 Comp Plan Policy 3, Strategy 3.1. Actions A, Strategy 3.2 Action A, "</p>
#10469	4.01 Purpose and Applicability
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/4/2022	<p>Throughout 3.05., the applicability statement seems to simply repeat the section title and therefore should be removed or modified.</p>

ID	Section
#4581	4.01 Purpose and Applicability
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:10/4/2021</p>	<p>QUESTIONS from constituents: The removal of ZOR draft text at the request of one stakeholder group is highly inappropriate and weakens the balance and fairness of this process. Who can take this "community" rewrite process seriously now as a result of this action?</p> <p>It looks like this entire draft text change bypassed ZOC. How will ZOC be notified of deletions and changes like this in the future? How will the Planning Commission be notified?</p> <p>What if other business owners find out how these [high-intensity use] businesses been given special consideration? There will be constant "deletions" of guidelines, etc.</p> <p>Will the public ever even see the text that has been removed? Will these comments be seen in enCodePlus? Will they be visible with doc track changes? Or will the PC and public only see "clean" copy text next April without the removed text for review?</p> <p>"The Aug. Staff packets said draft text was based on focus group/stakeholder input: ""More substantial revisions are proposed to the following sections based on feedback and comments from ZOC and the multiple rounds of community engagement conducted earlier in the project timeline." But letters and emails are implying draft text was from ""ZOC input."" Which is it? If the draft text being reviewed by ZOC now does not reflect the 2020 and 2021 public focus group input, then when will it?"</p> <p>The Finance Committee was given a one-sided view by DED/EDAC at the meeting on Sept. 13th. How will this be corrected with the committee and other Supervisors in the near-term?</p> <p>DED told REDC that there will be a separate "Summit" meeting on rural tourism businesses and ZOR regulations for the "growth of rural businesses." Will ALL stakeholders be invited? Or will it include only businesses and DED? How, when and where will Planning Staff support all stakeholders to resolve the imbalance to input from this whole thing?</p> <p>If this is not handled by ZOC, will the Planning Commission or TLUC be requested to address this and provide clear policy that supports all stakeholder input?</p>
#4229	4.01 Purpose and Applicability
<p>By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/16/2021</p>	<p>6.06.01 In working through the various uses, it seems that some sections references to exterior lighting, noise, etc. have been deleted but not in other uses. I assume staff will be going back to decide on how to best organize these, understanding that there has been some discussion, but I don't think a final decision has been made. Certainly if the standards are consistent across uses (generally makes sense), then having a single location that would be crosse-referenced seems reasonable.</p>

ID	Section
#4278	4.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/23/2021	Duplicative Exterior Lighting, Landscaping/Buffering/Screening, Noise, Parking and Roads/Access have been removed from Use-Specific Standards if they were not above & beyond what the other applicable standards were in the ordinance. Further discussion can be made about whether uses in this section need a higher level of those standards.
#3778	4.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	<p>"Aug. 25th Comments RE: ZOAM-2015-0006. NOISE STANDARDS – Per Item 10a, BOS/TLUC report April 19, 2018-ROIA for ZOAM-2015-0006, Noise Standards were to be reviewed. How have the following changes been incorporated in the Draft Text? How will noise (and lighting) be evaluated during application submission to enable enforcement after approval? Without setting applications measures the County is setting up the same points of failure as the existing ZO, almost ensuring the "enforcement by complaint" that focus groups during Round 1 and Round 2 have indicated must be addressed. Update existing or establish noise standards for certain uses to implement and maintain consistency with Ordinance Section 5-652(B) and Section 5-1507 (i.e., hours for outdoor music). Section 5-652(B) limits noise to 55dB(A) at the property line of an adjacent residential lot and prohibits outdoor music after 11 PM whereas Section 5-1507(E) limits residential and rural economy uses to 55dB(A) at the property line of the receiving property. Certain rural economy uses include specific noise standards, such as: - B&B Inn – shall have no outdoor music after 11 PM on weekends and 10 PM on weekdays and is not subject to Section 5-652(B) - Country Inn – shall have no outdoor music after 11 PM and is not subject to Section 5-652(B) - Rural Corporate Retreat and Banquet/Event Facility – may operate no later than 12 AM (midnight) and are subject to Section 5-652(B) - Restaurant (Farm) – may operate no later than 12 AM (midnight) and is not subject to Section 5-652(B) - Outdoor Amphitheater – is subject to Section 5-652(B) - Country Club and Public School – are not subject to Section 5-652(B) but are subject to their own noise standards. Amendment provides consistent regulations, reduces confusion, addresses like activities and impacts, and provides uniformity in treatment of noise generated by rural economy uses. Source of Proposed Amendment*: TLUC recommended per Board feedback as part of Noise ZOAM (May 13, 2016 TLUC meeting; October 20, 2016 Board Business Meeting)."</p>
#4281	4.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/23/2021	Any changes to the noise and lighting standards will be reflected in Section 5.12,
#3750	4.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc	3.06.01.A PURPOSE AND APPLICABILITY: Everywhere referenced, ADD to the list of "sensitive environmental features" the following: "state-listed rare and

ID	Section
<p>Maura@Walsh-CopelandConsulting.com Date:9/5/2021</p>	<p>endangered species/habitats." The state calls these "element occurrences" and they are mapped and available from the state Natural Heritage Office.</p>
<p>#4282</p>	<p>4.01 Purpose and Applicability</p>
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/23/2021</p>	<p>Noted. Staff will consider adding the proposed language when "sensitive environmental features" are listed.</p>
<p>#3734</p>	<p>4.01 Purpose and Applicability</p>
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/3/2021</p>	<p>3.06.01.A. Do we really want to suggest that there is a desire for a "diversity of land uses within the county"? The general goal for the RPA is agricultural and residential, with certain rural economy uses. The goal is thus for a limited number of uses, not a "diversity" of uses.</p>
<p>#3890</p>	<p>4.01 Purpose and Applicability</p>
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/7/2021</p>	<p>I read this as ensuring the orderly development of a diversity of uses, not ensuring a diversity of uses</p>
<p>#3672</p>	<p>4.01 Purpose and Applicability</p>
<p>By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/1/2021</p>	<p>I like consolidating the buffering, etc. into this section. However, do we need to be mindful and exempt certain uses specifically from some of them?</p>
<p>#4283</p>	<p>4.01 Purpose and Applicability</p>
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/23/2021</p>	<p>Yes, if there are uses that need either; more buffering than the applicable standards and regulations in the ordinance set forth, or, need to be exempted for those regulations, please identify those uses so that additional language can be considered.</p>
<p>#3524</p>	<p>4.01 Purpose and Applicability</p>
<p>By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:8/29/2021</p>	<p>Has this section been carefully cross referenced with the Use Tables to be sure that uses are not left out that should be here? One comes to my mind, which is Virginia Farm Winery. I say this because, like Limited Brewery, it creates a place of public assembly that does not adequately ensure public safety. What other uses are left out? It is hard for us as committee members to do this because of the difficulty in navigating throughout the Use Tables and back and forth between the Use-Specific Standards, the Tables and the Definitions.</p>

ID	Section
#3659	4.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	This section carried-over use-specific standards that were in 5-600, and identified standards that were included in definitions. Many uses in the use tables did not and do not have use-specific standards. Virginia Farm Winery is one of those uses. However, staff can consider adding use-specific standards based on recommendations or suggestions from the ZOC.
#3109	4.01 Purpose and Applicability
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:8/23/2021	"3.06.01.A PURPOSE AND APPLICABILITY: Add 'environmental' to the list of items being protected, with notation such as: "" and to protect the County's unique/sensitive environments"" as the General Plan dedicates Chapter 2 to those goals. Does a 'restrictive covenant' clause need to be included as a conformance item?"
#3273	4.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	agreed. We will add the appropriate language in here.
#3057	4.01 Purpose and Applicability
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:8/23/2021	<ul style="list-style-type: none"> - This language needs to be included: "Unless otherwise specified, the following additional regulations may be modified by Minor Special Exception..." - Maybe addressed elsewhere in the ZO but how will these standards be applied to large site in the course of a SPAM? Will standards apply to only the areas of disturbance, or will site be required to all come into conformance with new use regulation standards which will become legal non-conforming with the adoption of the new ZO?
#3274	4.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	We will look into both of these points.
#3055	4.01 Purpose and Applicability
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:8/23/2021	I prefer the current intro to Section 5-600. Is the language in 5-600 still valid and could we use it with some edits for brevity if necessary? I agree with John that this language seems applicable to the general administration of the ZO.

ID	Section
#3275	4.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	we will revisit and consider carrying over existing 5-600 intro.
#2955	4.01 Purpose and Applicability
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:8/19/2021	Paragraph B seems universal and should be relocated to a general administration section of the ordinance.
#3276	4.01 Purpose and Applicability
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:8/24/2021	we will revisit and consider carrying over existing 5-600 intro.
#4768	Chapter 4: Use-Specific Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:10/6/2021	Could Use-Specific Standards, which nearly parallel Use Table list absolutely do so? It would make it easier to cross check and be better organized.
#4767	Chapter 4: Use-Specific Standards
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:10/6/2021	It seems most Uses have Use-Specific Standards, but there are some that are missing or seem to be: Dry Cleaning Plant, Maintenance & Repair Services, Feed & Farm Supply, Non-Store Retailers, and Nursery-Commercial are a few I saw. I wonder if there are more.
#3889	Chapter 4: Use-Specific Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"During ZOC discussions and review of material with LCPCC Member representatives, it has become apparent there are varying levels of background knowledge of county activity and documents between ZOC members (former ZOAG and new), new Staff and Consultants. To ensure common understanding of LCPCC ZOC input, a chronology has been prepared to provide background for the comments and requests for performance standards revisions submitted by LCPCC ZOC. Because documents can sometimes be difficult to locate, links have been provided for review. Also provided are updated Zoning Comparison Matrix documents to assist with regulation review to provide specific, direct requests for revision of standards, to address ZOC Response #3660 (R. Reed) stating, ""Many standards are carried over. Staff, for the most part, did not add

ID	Section
	<p>or revise standards that had not be (sic) identified in public outreach and internal reviews. Staff will respond / revise standards based on consideration of recommendations, suggestions and other feedback." CHRONOLOGY</p> <p>-- 2015: Rural Use ZOAM 2015-0006. The stated purpose of this ZOAM was to amend the zoning ordinance for text errors, fixes, encourage economic development and "incorporate revisions recommended by the public." Citizens were told a key purpose of this ZOAM was to "make rural use performance standards equitable." (Supervisors Volpe & Clarke, Feb. 2015). 10-21-15-ZOAM-2015-0006-BOS Staff Rpt (https://loudouncoalition.org/wp-content/uploads/2020/04/ZOAM-2015-0006-BOS-Staff-Rpt-10-21-15.pdf)</p> <p>-- However, when presented in Oct. 2015 the ZOAM instead was expanded by ZOAG to include 36 new permitted and SPEX land uses in AR-1, AR-2, Cluster, TR, A-10 Hamlet and A-3 Open Space, and did not address the majority of performance standards issues previously identified via public input. The 4-26-16-ZOAM-2015-0006 PC PH Staff Report (https://loudouncoalition.org/wp-content/uploads/2020/04/ZOAM-2015-0006-PC-PH-Staff-04-26-2016-Report.pdf p.4-5) stated, "Staff is supportive of many of the proposed amendments developed in conjunction with ZOAG, however is concerned with the significant implication of certain uses being allowed within open space areas. The draft text provides for uses that are not consistent with the intent of these areas and provides for more intensive uses that are not compatible with adjacent residential uses. Staff recommends that more discussion occur regarding the proposed amendments in these areas and that, in addition, community outreach be conducted to gain input from the residents of these developments prior to proceeding. " -- From 2012-2016 Businesses were allowed to "sit" at the ZOAG table to negotiate regulations impacting their businesses, however residents who attended ZOAG meetings were not allowed to provide input. Public input at ZOAG meetings was not permitted until January 2017. Public input provided to ZOAG after regulations were implemented were most often considered "enforcement issues" as regulations did not take into consideration impacts to adjacent property owners. -- The BOS September 2016 Strategic Planning Retreat included goals for "Improving the rural economy in a way that maintains the quality of life for current residents." Shortly thereafter, Supervisor Tony Buffington sent a letter to REDC stating it was, "critically important that we strike an appropriate balance between having a strong rural economy and ensuring a high quality of life for residents." Supervisor Buffington's letter requested "recommendations designed to: Define the types of businesses that should comprise our rural economy; improve the balance between maintaining a strong rural economy and ensuring a high quality of life for residents," to be obtained via a collaborative effort between Loudoun residents, business owners, and other groups, organizations and stakeholders interested in the future of Loudoun County. (https://loudouncoalition.org/wp-content/uploads/2020/04/2016-Oct.-Buffington-Ltr-to-REDC.pdf) -- From this request a business and citizen Ad-Hoc Committee was formed in December, 2016, with a Rural Use Zoning Comparison Case Study completed in March, 2017 identifying the key issues and recommendations requested. The Case Study's primary conclusions and responses to the questions posed were that ZONING INCONSISTENCY (i.e., inconsistent and/or non-existent Rural Use performance standards) plus LOCATION AND INTENSITY IMPACTS of noise, traffic and enforcement were the primary factors impacting the "balance between Rural Economy and Quality of life for residents." The case study also identified environmental concerns pertaining to buffering, water resources, enforcement by complaint action and tracking, permit process issues and violations. (https://loudouncoalition.org/wp-content/uploads/2020/05/ZONING-PERMITS-CASE-STUDIES-MAY-2018-</p>

ID	Section
	<p>County-Staff.pdf) -- The case study 2017-RURAL USE Zoning/Performance Standards Inconsistencies Matrix identified the actual inconsistent and missing performance standards within the zoning ordinances for rural uses, presented in a similar grid as used by the Department of Planning & Zoning. (https://loudouncoalition.org/wp-content/uploads/2020/04/RuralZoningComparison-3-15-2017.pdf)</p> <p>-- 2018. The findings and recommendations in the 2017 case study were shared with County Senior Staff, Planning & Zoning Staff, and the Zoning Ordinance Action Group (ZOAG) in 2018 for discussion for ZOAM-2015-0006. Staff and ZOAG indicated the identified issues and recommendations would be considered for the new Comprehensive Plan. -- In September 2019 Board of Supervisor action "moved" all remaining items from the ZOAM 2015-0006 Phase II and III to be addressed as part of the Zoning Ordinance Rewrite (ZOR).</p> <p>-- 2020. The Consultants Dec. 2020 Zoning Audit regulatory recommendations (https://loudouncoalition.org/wp-content/uploads/2021/01/Code-Audit-%E2%80%93-Text-Analysis.pdf p. 37). Were to: "Update and include Additional Regulations for Specific Uses, as well as other regulations, to ensure adequate infrastructure is provided, affects from incompatible uses are sufficiently mitigated, and site design protects the rural historic landscape."</p> <p>The above chronology confirms the long duration of requests to update regulations to mitigate known and documented impacts to residents. Staff has expressed concern and agreement multiple times, being either overruled or delayed in implementing their professional planning advice. LCPCC ZOC formal comments support Staff's efforts to complete this long-term project and request. To do so, the original 2017 Rural Use Zoning Comparison Matrix was UPDATED (ZOR-2021 REVISED-RuralZoningComparison) to include additional uses and formatted for the new Zoning Ordinance Rewrite sections. https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-REVISED-RuralZoningComparison.pdf To identify the specific ZOR recommendations the Zoning Comparison was SORTED by SCALE AND INTENSITY of Use to identify the inconsistent and missing regulations by category impacts High, Medium or Low. (ZOR-2021 INTENSITY SORT-RuralZoningComparison) https://loudouncoalition.org/wp-content/uploads/2020/04/ZOR-2021-INTENSITY-SORT-RuralZoningComparison.pdf The primary recommendations are for Staff/Consultants to use this information to: 1) Evaluate Uses HORIZONTIALLY for impacts and standards inconsistencies, instead of VERTICALLY by business operation. 2) Apply regulations consistently using SCALE LEVELS for similar Uses that attract or expect more than 50 attendees daily, have events more than 10 times/year on 10 acres or more. 3) Apply consistent and equitable standards for acres, structures, yard setbacks, buffering, parking, road access/traffic control, lighting, noise and permitting for all uses as initiated with ZOAM-2015-0006."</p>
#3777	Chapter 4: Use-Specific Standards
<p>By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021</p>	<p>Aug. 25th Comments RE: EnCODEplus Definitions. Although adding the definitions each with its own page is helpful, it is very difficult to use/find definitions in this order. If there is any way to INDENT each definition on the left browse column, OR bold/underline the heading to see the catetory breaks?</p> <p>Aug. 25th Comments RE: MULTIPLE USES SCALE & INTENSITY. No reference or mechanism to evaluate multiple Uses on a single parcel for scale and intensity of use.</p> <p>Aug. 25th Comments RE: RELATED REGULATIONS. General comment</p>

ID	Section
	throughout the document. A detailed review of many uses cannot be completed before receipt of the related regulations, including but not limited to: Noise, Lighting, Landscaping/Buffering/Screening. Without review of the referred-to sections, current review should be considered "in-progress" only, not final.
#3776	Chapter 4: Use-Specific Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	For the record: "Aug. 25th Comments RE: What has often been overlooked are the ZONING ORDINANCE INTENT & PURPOSE -- The Zoning Ordinance is "enacted in order to promote the health, safety and welfare of the residents of Loudoun County and to implement the Comprehensive Plan." There are 14 goals outlined in the Zoning Ordinance, which includes, letter "J. Encourage economic development activities that provide desirable employment and enlarge the tax base." -- But there are 13 other goals that must be considered during the discussions for the Zoning Ordinance Rewrite, which include: protecting social and economic well-being of private and public property; adequate water, sewerage protection; congestion in travel; loss of life, health, or property; preservation of agricultural and forestal land, and several more. In short, the 14 goals include the protection of Business/Economic, Environmental/Historic and Residential/Social interests for the SUSTAINABILITY of Loudoun County for ALL tax-paying business and residential property owners and patrons. -- The COUNTY VISION also confirms the balanced emphasis for all zoning stating, "While appreciating and acknowledging our rich history, Loudoun County strives to be a prosperous, inclusive, equitable and sustainable community where residents feel free to LIVE, work, learn and play." "
#3676	Chapter 4: Use-Specific Standards
By: James David Tags: staff james.david@loudoun.gov Date:9/1/2021	ZOC Member urged consistency in each Applicability section for each standard. Sometimes districts are listed sometimes not. Will consider a more standardized approach in subsequent drafts.
#3689	Chapter 4: Use-Specific Standards
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/2/2021	Use Definition. Zoning Districts. Standards. All in one place would save at least 5 mouse clicks.
#3730	Chapter 4: Use-Specific Standards
By: Mark White Tags: staff mwhite@planningandlaw.com Date:9/3/2021	Sometimes the standards apply only to designated districts, while others apply universally. In the latter case, we could add "in any zoning district" or something like that.

ID	Section
#3591	Chapter 4: Use-Specific Standards
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/1/2021	I have a question on noise. Is noise created by people at a gathering a zoning issue or a sheriff issue? I can't remember how the Code was changed to address the distinction. I don't recall loud equipment or buildings at a brewery or winery.
#3661	Chapter 4: Use-Specific Standards
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	This is a question that I will need to ask Zoning Enforcement to respond to.
#3688	Chapter 4: Use-Specific Standards
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/2/2021	You all are doing a great job responding so quickly. Really appreciate knowing you are looking at the comments. Don't get upset with my sarcasm. Seems we are both doing this late at night.
#3552	Chapter 4: Use-Specific Standards
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:8/29/2021	So many standards are carry over. Was there no intention of revising them or will we only get to look at the staff-proposed standards in the 90-day review?
#3629	Chapter 4: Use-Specific Standards
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/1/2021	Excellent question! The answer will have a significant impact on the time involved in review.
#3660	Chapter 4: Use-Specific Standards
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:9/1/2021	Correct that many standards are carried over. Staff, for the most part, did not add or revise standards that had not be identified in public outreach and internal reviews. Staff will respond / revise standards based on consideration of recommendations, suggestions and other feedback.
#3590	Chapter 4: Use-Specific Standards
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/1/2021	I want to reverse myself on a point. I think we could move the definition of these uses into the applicability paragraph. It would give the reader everything they need in one spot, and shorten the definition section.

ID	Section
#3588	Chapter 4: Use-Specific Standards
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/1/2021	A good number of uses under 3.06 also require a special exception or minor special exception. It seems unnecessary to have standards and then require a SPEX. Also seems contrary to the Board directive to streamline and reduce legislative reviews. The standards could also make the SPEX review less inquisitive and more mechanical.
#3550	Chapter 4: Use-Specific Standards
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:8/29/2021	I know we are carrying over some standards from the R93 ordinance but there seems to be no consistency in the standards. I'm sure the district standards can address setbacks, and everything already has to comply with one set of lighting, parking and noise standards. Why not also create a single rural hours of operation standard and a rural Floor Area Ratio. Maybe we can reduce the number of 3.06 uses by incorporating these in the district standards. I'd like to say the same thing about setbacks but will wait for the district standards. This restriction on road access points needs to be explained to me. Many of these uses benefit from a circular driveway pattern.
#10868	3.04 Temporary Uses
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"2022 Round 3 Input: Event management regulations need to be consistent throughout the zoning ordinance. ZOC discussions in 3Q2021 reviewed draft language addressing this concern which was later deleted by the former DPZ Director. This text should be reinserted, reviewed and considered.</p> <p>The regulations for non-event facility businesses hosting semi-regular events should be presented to ZOC for review and inclusion in the draft ordinance moving forward to the Planning Commission to ensure compliance with 2019 Comp Plan Policy 3.1 . For better ""event"" management, consider annual permits for multiple off-site farm market events rather than 1 permit for 1 event similar to lodging uses. "</p>
#10855	3.04 Temporary Uses
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"3.04 TEMPORARY USES/EVENTS and 3.05.01 USE-SPECIFIC STANDARDS PURPOSE AND APPLICABILITY 2022 Round 3 Input: Event management regulations need to be consistent throughout the zoning ordinance, primarily for high-intensity uses to ensure compliance with 2019 Comp Plan Policy 3.1. Event permits should be less cumbersome for off-site farm market events. For better ""event"" management, consider annual permits for multiple off-site farm market events rather than 1 permit for 1 event (similar to private parties management for lodging uses). 2022 Round 3 Input: ZOC reviewed draft language in 3Q2021 addressing Event management at high-intensity uses, which was later deleted by the former DPZ Director. This text should be reinserted, reviewed and considered by Staff, Planning Commission and BOS. https://loudouncoalition.org/wp-content/uploads/2022/06/2021_09-15-Draft-Text-Deletions.pdf"</p>

ID	Section
#9700	3.04 Temporary Uses
By: Russ Forno Tags: zoc russ.forno@ofplaw.com Date:4/18/2022	Temporary or accessory farm market uses must currently apply for a special event permit for EACH event. RECOMMEND modifying to allow approval of said permit for MULTI-EVENTS (e.g. ten specified dates within the calendar year on a single permit).
#3896	3.04 Temporary Uses
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/7/2021	3.05-D-6 Term of Approval for Special Events Consider changing term from 14 days to 18 days, with the same number of days between events. Most events concentrate on weekends. With 14 days, you can't do two consecutive full weekends; and if you do one weekend you need to skip two weekends before doing another. Increasing to 16 would allow an event to run from Saturday through the following Sunday. Add two more days so the event can run Friday through a following Monday holiday.
#3895	3.04 Temporary Uses
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/7/2021	3.04-d-2 What is a "residential Location"? Needs a clear definition. How does this affect multi-use parcels, or parcels where there are multiple primary uses or where residential is an accessory use?
#3775	3.04 Temporary Uses
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.05.D TEMORARY USES. SPECIAL EVENTS. 7. Maximum number of non-exempt Special Events per property. What is an example of a Special Event being 2000 feet from the location of the previous event? Is this intended for Morvan Park or Oatlands?
#3774	3.04 Temporary Uses
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.05. TEMORARY USES. SPECIAL EVENTS. Somewhere (circa 2015) I found the definition of Special Event for Loudoun included that "a Special Event is open to the public and is planned or reasonably expected to attract large assemblies of persons." Can this be added to (or added back) to the standards for Special Event?
#10219	3.04 Temporary Uses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/15/2022	The proposed definition (not available when this comment was made) includes this in its first sentence: "Special Event: A temporary commercial or festive activity or promotion at a specific location that is open to the public and is planned or reasonably expected to attract large assemblies of persons. . ."

ID	Section
#3773	3.04 Temporary Uses
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	"3.05.D TEMORARY USES. SPECIAL EVENTS. 2. Confirming--does this NOT apply to residential properties in ARN and ARS? Also, other than the requirement for 2 acres, will there be NO limit on the number of attendees for this small of a parcel? 4.b. Minimum Standards. If a location cannot ""reasonably accommodate"" the proposed event, should there be a sliding scale allowance by actual size of parcel and intensity based on event site plan?"
#3701	3.04 Temporary Uses
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/2/2021	Temporary Sales Structures: C.1. Is this referring to 'temporary' structures for temporary sales? I know there are Xmas tree farms that may use existing structures larger than this on a temporary basis for sales, which seems perfectly reasonable. Any size existing structure should be acceptable.
#3683	3.04 Temporary Uses
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/2/2021	bullet 2. Suggest temporary dwellings not require 6 month increments but leave the schedule up to the ZA. bullet 5. Suggest expanding this to other potential hazard mitigation uses such as temporary medical facilities, temporary military dorms, temporary police and law enforcement, etc. I also would not limit it to construction or set a deadline.
#13671	3.03 Accessory Uses
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add EV charging as an accessory use to all principal use categories and eliminate the need for a site plan to add an EV charging station for residential or fleet use.
#13639	3.03 Accessory Uses
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add site specific renewable energy to all principal use categories to allow for wind, geothermal with use-specific standards as may be needed.
#12478	3.03 Accessory Uses
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/15/2022	Mobile vendors are not listed as an accessory use in the rural area, but many principal uses rely on them today. They should be added as an accessory use with use specific standards.

ID	Section
#12340	3.03 Accessory Uses
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/14/2022	Retail Sales: Just curious what kind of retail sales would be appropriate in the principal use of Infrastructure. Maybe this is a mistake?
#12339	3.03 Accessory Uses
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/14/2022	"Small wind" turbines should be an allowable use in the RPA with appropriate height restrictions--generally 30 feet, to help reduce energy bills, or power pond filtration systems. Definition should be added to the definitions list and include the potential to have very small wind turbine fence structures under research and development.
#9929	3.03 Accessory Uses
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:4/28/2022	I thought we discussed adding emergency power generators as accessory to a residential use. Is there some reason not to do so?
#10204	3.03 Accessory Uses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/14/2022	Changed to "All"
#4228	3.03 Accessory Uses
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:9/16/2021	3.04.F.5. Outdoor storage This looks like it might be in error. In 5-101 in the current ordinance, there is no mention of outdoor storage for a home occupation 5-101(A), but there is reference to this language in 5-101(B)(14) for commercial and industrial uses. There is also no reference like this in 5-400 reL home occupations. If it's not an error, then presumably this means that parking is also allowed in the outdoor storage area, but it just seems more like an error of placement.
#3900	3.03 Accessory Uses
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/7/2021	3.04 ACCESSIORY USES D.2 Retail Sales 2.a.3 & 4 The design criteria are no objective or measurable - can't be administered

ID	Section
#3899	3.03 Accessory Uses
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/7/2021	3.04 ACCESSORY USES D.1 Floor Area Limitation Is the 30% limit reasonable? 1) Does it apply to parking? How measure size of parking? For high traffic uses (shopping centers) parking requirements may take up nearly half of a site. 2) Does this apply to the aggregate of all accessory uses? 3) Can a parcel be used principally for stormwater management?
#10208	3.03 Accessory Uses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/14/2022	1) Yes. See Section 5.05.02.D.2 - Accessory Uses 2) Yes 3) No, stormwater management BMPs are not a principal use
#3898	3.03 Accessory Uses
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/7/2021	3.04 Accessory Uses C General Standards #3 1) Currently, are not accessory structures permitted within rear and side yards on residential lots? (also dog houses, emergency power, fence or wall, stormwater management) 2) Parking is defined herein as an accessory use. Is it to be prohibited with the the required yards? (also emergency power, fence or wall, stormwater management)
#3897	3.03 Accessory Uses
By: Eric Zicht Tags: zoc zicht@erols.com Date:9/7/2021	3.04 Table 3.04-1 1)Check to make sure all the uses in the existing ordinance are covered 2) Storage Sheds - Shouldn't the 200-sf criteria apply to residential uses and not commercial/agriculture? Is 200-sf large enough? Should larger lots be permitted larger storage sheds? 3) Storage Sheds - Agriculture & commercial - what distinguishes these from warehouses and barns?
#10210	3.03 Accessory Uses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/14/2022	1) Staff is auditing Table 3.03-1 (formerly 3.04-1) to check that no accessory uses are unintentionally lost. If there are omitted, we will include why. 2) A storage shed is an accessory use in residential, for personal, non-commercial use, without a sq ft restriction. 3) the size
#3772	3.03 Accessory Uses
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:9/6/2021	3.04.E.3 ACCESSORY USES. Home Occupation Parking and Visibility and F.5. Outdoor Storage, Parking. How will vans/trucks with business signage be evaluated for parking requirements for E.3 and visibility for "no visible evidence of the conduct of the home occupation"?

ID	Section
#3771	3.03 Accessory Uses
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:9/6/2021	3.Parking HOA/Condo Association owned parking should be excluded from this requirement.
#3733	3.03 Accessory Uses
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:9/3/2021	Why is this section here? I fear that some people will see permitted things like a "fence or wall" and think this gives them free rein to build something we don't want. I trust that the limitations in 3.06 will fix this, but I suggest that there be a specific reference to 3.06 for uses applicable uses. For example, after "fence or wall," add something like "subject to 3.06.) Make it crystal-clear.
#3710	3.03 Accessory Uses
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:9/2/2021	Accessory uses, Bulk storage of fuel should be allowed for agricultural uses.
#10211	3.03 Accessory Uses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/14/2022	Agriculture uses are excluded from the definition of Storage, Bulk Gasoline. Will revisit this definition to change to "Fuel" and consider if this is an appropriate place for the exclusion.
#3699	3.03 Accessory Uses
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/2/2021	Parking for retail uses as an accessory use (D.2.a.7.): is it 1 space per 500 sf of gross 'retail' floor area or gross floor area of the entire building?
#10212	3.03 Accessory Uses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/14/2022	Accessory uses are included in the calculation of floor area of the principal use, unless noted otherwise. 5.05.02.D.2
#3698	3.03 Accessory Uses

ID	Section
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/2/2021	Confusion about storage sheds for Agriculture. It sounds as if 200 sf is the maximum. Certainly that is not the intent. Clarify.
#3697	3.03 Accessory Uses
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/2/2021	It would seem that Recreational & Athletic fields might be associated with other principal uses than the two listed. An HOA may wish to establish playing fields...
#3695	3.03 Accessory Uses
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/2/2021	Subsections E,F,G misidentified in Principal Use Column - Check/correct. For example For Outdoor Storage it should refer to F, but it refers to G
#10213	3.03 Accessory Uses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/14/2022	revised
#3694	3.03 Accessory Uses
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:9/2/2021	Accessory use: Emergency Power Generator. Add Residential to the Principal Use Category. Many homes have/need emergency generators.
#10214	3.03 Accessory Uses
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:6/14/2022	revised to "All"
#3684	3.03 Accessory Uses
By: John Merrithew Tags: zoc john.merrithew@loudoun.gov Date:9/2/2021	I don't understand the value of the list; particularly if the ZA is still going to be called on to make a determination. An emergency power generator is more and more a residential accessory. Restaurants may want a private greenhouse for produce.

ID	Section
#13635	3.02.03 Rural Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add energy storage and batteries as a use in the Rural Policy Area.
#13547	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:7/18/2022	Farm Bureau 3.02.03-3 Industrial Industrial dumping/construction dumping Given our previous and continuing violators and the difficulty for neighbors to report these violators this known loop hole should be listed so the county can explicitly leave it blank and therefore not permitted.
#13534	3.02.03 Rural Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Cultural facility has no definition, nor does cultural tourism. Need definitions, or combine these two into the single cultural center category which does have a definition. Size and performance standards are preferable to a special exception for such a use to make it easier for villages that want to have such a museum or visitor center which meets the single cultural center definition.
#13530	3.02.03 Rural Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Uses that currently are not present in rural historic villages and may create offsite impacts or may be incompatible with the density, intensity, and scale of existing development in a village should be removed from the use table until such time as village-specific small area plans are developed and adopted to provide up-to-date community concurrence on what is and isn't compatible. These uses include: Rural resort/rural retreat, kennel, banquet/event facility, car wash, vehicle service station, conference and training facility, recreation indoor or outdoor, parking facilities, transit facilities.
#13494	3.02.03 Rural Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/17/2022	Modify this table or have an additional reference to the MDOD section in order to restrict by-right uses in the MDOD and/or provide additional use-specific standards for the MDOD. Such uses include those that may require excessive clearing and/or bring significant offsite traffic necessitating excessive clearing and grading resulting in related environmental impacts. These uses include accessory dwelling unit (size), tenant house, rural resort, animal services, restaurant, commercial/farm winery & limited brewery, agricultural cultural center, agritainment, cultural tourism, equestrian event facility, telecommunications facility, feedlot.
#12336	3.02.03 Rural Use Table

ID	Section
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/14/2022	Brewery, limited use is not compatible with a lot on the edge of an historic village due to the offsite impacts. It should be prohibited in this district as well as in the other two village districts.
#12332	3.02.03 Rural Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/14/2022	Craft Beverage Manufacturing should be a prohibited use in VC district unless the village is on central water and sewer outside of the RPA due to potential for excessive water and septic impacts on groundwater resources.
#12329	3.02.03 Rural Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/14/2022	Open Space/Passive: Should be a permitted use in the VR, VC, and VAR districts instead of prohibited.
#12325	3.02.03 Rural Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/14/2022	Food and Beverage Sale/Service: Farm Market (off-site production)These regulations have changed from permitted to SPEX, which is onerous and counter-productive to supporting agriculture in Loudoun. Has there been a problem with the existing regulations? If so, instead of requiring a SPEX, suggest use specific standards to address the problems.
#9766	3.02.03 Rural Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Breweries MUST need a SPEX!!! While they add to the county now, we could end up with too many. Thus the SPEX gives legislative oversight. Doing so would not affect existing breweries at all, except for the benefit of reducing future competition.
#9765	3.02.03 Rural Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Telecommunications facility" should require a SPEX. Given the squabble over AT&T and Short Hill Mountain, there definitely needs to be legislative oversight.
#9764	3.02.03 Rural Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com	Change "slaughterhouse" to "abattoir" to align with the definition.

ID	Section
Date:4/23/2022	
#9763	3.02.03 Rural Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Rural retreats has loopholes and should require a SPEX.
#9762	3.02.03 Rural Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	"Death services" could be changed to "End of life services," to placate the squeamish.
#9761	3.02.03 Rural Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Farm Machinery? Does this include both the Sales/service category and the Repair category? They have different intensities.
#9760	3.02.03 Rural Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Snack and beverage bars should require an M. As defined, they would allow serious commercial operators (like Starbucks) to operate anywhere in the RPA, even on mountaintops and on cluster lots. We don't want to stop small, independent operations, though. Thus an M is more appropriate than a P or an SPEX.
#9759	3.02.03 Rural Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Move wineries and breweries to Food & Beverage. That won't change things for them, and aligns with common sense and with how many of them presently operate.
#9758	3.02.03 Rural Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	There should be more legislative oversight of many uses, especially for ones with commercial overtones. For one thing, there are some categories that can be abused via loopholes. Thus I STRONGLY suggest requiring a SPEX for Campgrounds, Guest farms, Country inns and Rural Resorts and Banquet/event facilities.

ID	Section
#9757	3.02.03 Rural Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	I hope there will be a more detailed Uses section for cluster subdivisions when we take up that subject.
#6296	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/30/2021	Snack bars in RPA MUST require a SPEX. As these are defined to include coffee houses and are P anywhere in RPA, Starbucks and others could plo down anywhere in RPA as a permitted use.
#6295	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/30/2021	Art studios should be P/M, not P/S.
#6294	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/30/2021	It is a FARCE to keep including Breweries in the Agriculture category. They should be in Food an Beverage Sales, along with such other Rural Economy uses as farm markets, craft beverages and wineries.
#6293	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/30/2021	Restaurants in the ARN and ARS should require a SPEX.
#6292	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/30/2021	Tenant dwellings should either be Permitted or need a Minor S.E.
#3766	3.02.03 Rural Use Table

ID	Section
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:9/5/2021	RAR, RC, & RV are not defined at the bottom of the table as the other districts are.
#3408	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	One of the most well known issues impacting agricultural producers in our county is a lack of processing facilities for their product. Why are we not permitting such facilities when it could potentially improve a well documented issue?
#3407	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	Brewery,Limited should not be listed under Agricultural. Many of these have no active agriculture and they would better fit as Entertainment. If we want to allow them as an agricultural business there should be a standard of production similar to wineries. If they are not producing agricultural product they should need a S to be in RN and RS.
#3406	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:8/25/2021	As we have commercial wineries as P/S under the agricultural section Brewery,limited should also be P/S rather than simply P. These businesses are growing in size and impact on the surrounding community and we should be approaching the business model with greater caution.
#2473	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/26/2021	Rural Use Tables, Section 3.02.03-2 Brewery; Winery, Commercial; and winery, Virginia Farm should all be moved from the Agriculture section to the Food and Beverage section. This is to align with Virginia Code, which defines "Agriculture" very narrowly and that definition does not include these uses. Making this change will have no effect on wineries and breweries, but it will prevent confusion as we move along.
#2120	3.02.03 Rural Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:7/10/2021	Looking at the use list for the 3 village types, it seems to me there are a number of uses that would not be appropriate that are listed, such as airports, government, car wash, service station, vehicle repair (light), etc. The broad scope of uses seems counter to the notion of a rural village. Am I misunderstanding what we intend these villages to be?
#1952	3.02.03 Rural Use Table

ID	Section
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/6/2021	Why are uses being deleted from a table if they are not being included or defined somewhere else? For example, Guest house is being removed because it is now falling under an Accessory Dwelling. However, Auction Facility, livestock is being deleted from the Urban and Suburban Policy Area table only and Dwelling, single-family attached is being deleted only from the Rural Policy Areas table. If the uses are not allowed, should they not still be included in the table for consistency and the boxes just left blank?
#1640	3.02.03 Rural Use Table
By: Gem Bingol Tags: zoc gbingol@pecva.org 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 Tags: staff james.david@loudoun.gov 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.
#1630	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Tags: staff james.david@loudoun.gov Date:6/15/2021	Will consider amending the permissibility of "Brewery, Limited" to SPEX in VAR.

ID	Section
#1627	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Tags: staff james.david@loudoun.gov 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 Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Tags: staff james.david@loudoun.gov 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.
#1625	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Tags: staff james.david@loudoun.gov 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

ID	Section
	considered that would be more appropriate than a light production use in the districts where "Craft Beverage Manufacturing" was formerly proposed.
#1522	3.02.03 Rural Use Table
By: Eric Zicht Tags: zoc zicht@erols.com Date:6/13/2021	VILLAGES 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 Tags: staff mwhite@planningandlaw.com 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.
#1503	3.02.03 Rural Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com 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 Tags: staff mwhite@planningandlaw.com 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.
#1499	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com 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 Tags: staff mwhite@planningandlaw.com 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.

ID	Section
#1498	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com 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 Tags: staff mwhite@planningandlaw.com 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 Tags: zoc CharlesHouston3@yahoo.com Date:6/12/2021	Rural Retreat - To avoid abuse, remove "P" and require SPEX.
#1527	3.02.03 Rural Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com 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 Tags: zoc CharlesHouston3@yahoo.com 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 Tags: staff mwhite@planningandlaw.com 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 Tags: zoc CharlesHouston3@yahoo.com 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.

ID	Section
#1529	3.02.03 Rural Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com 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 Tags: zoc CharlesHouston3@yahoo.com 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.
#1530	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com 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 Tags: zoc CharlesHouston3@yahoo.com 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 Tags: staff mwhite@planningandlaw.com 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 Tags: zoc CharlesHouston3@yahoo.com 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 Tags: staff mwhite@planningandlaw.com Date:6/13/2021	This is something to consider for Use Standards in Section 3.06. Thanks for pointing this out.

ID	Section
#1491	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com 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 Tags: staff mwhite@planningandlaw.com 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 Tags: zoc CharlesHouston3@yahoo.com 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 Tags: staff mwhite@planningandlaw.com Date:6/13/2021	We can also address them with supplemental regulations in Section 3.06.
#1415	3.02.03 Rural Use Table
By: Jeff Browning Tags: zoc jeff@browningequipment.com 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 Tags: staff mwhite@planningandlaw.com 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.
#1380	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com 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

ID	Section
	retain its rural character. In practice, though, "rural economy" has become a concept that is allowing blatantly commercial uses to intrude on the RPA.
#1374	3.02.03 Rural Use Table
By: John. Merrithew Tags: zoc Date:6/1/2021	What is a testing facility? Could not find a definition.
#1537	3.02.03 Rural Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com 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 Tags: zoc 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 Tags: staff 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.
#1372	3.02.03 Rural Use Table
By: John Merrithew Tags: zoc Date:6/1/2021	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. I believe tenant housing can be important in the rural area and should be a permitted use. 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. Water extraction should not be permitted anywhere in the County.Farm Coops are no it a use. They are a type of ownership.

ID	Section
#1540	3.02.03 Rural Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com 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.
#1371	3.02.03 Rural Use Table
By: John Merrithew Tags: zoc Date:6/1/2021	Group living uses should be located only where central or municipal utilities are available. Not in the rural areas.
#1538	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. "Rooming and boarding" includes the current "rooming house; Dormitory, fraternity/sorority house, rooming/boarding house or other residential hall" uses. "Rooming house" is currently allowed by right in AR-1 and -2. "Dormitory, fraternity/sorority house, rooming/boarding house or other residential hall" is only allowed in PD-MUB and PD-TRC. "Congregate housing facility" and "orphanage" (collapsed under "congregate housing") are allowed in a number of districts, including A-10 and A-3. "Continuing care facility" and "congregate care facility" are collapsed, with the former allowed in a number of districts including by SPEX in A-3 and latter only in PD-AAAR and PD-TC- Town Ctr. Fringe.
#1354	3.02.03 Rural Use Table
By: Eric Zicht Tags: zoc zicht@erols.com Date:5/31/2021	TABLE 3.02.03-3 Rural Policy Uses: I believe that creating separate zones for rural villages merits a separate zoning initiative with meetings with the residents and businesses of each village. This should not be rolled in to this zoning re-write.
#1386	3.02.03 Rural Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Current zoning districts that apply to villages include: PD-RV, CR-1, CR-2, CR-3, CR-4, RC, A-3. Proposed new zoning districts to be discussed with ZOC later in process.
#1352	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/31/2021	Totally agree with Maura that many uses generally permitted in AR-1 and AR-2 are NOT compatible with cluster subdivisions. Start with a blank sheet and simply list uses that are compatible - there aren't many.

ID	Section
#1541	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted - my understanding is that these uses are under discussion in the pending ZOAM.
#1349	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.03-3-RPA. TRAINING FACILITY. Why are designations inconsistent between ARN (as P/M) and ARS (as M)?
#1542	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Training facility is now designated as SPEX in both ARN and ARS.
#1348	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.03-3-RPA. TRAINING FACILITY. Why are designations inconsistent between ARN (as P/M) and ARS (as M)?
#1420	3.02.03 Rural Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	This distinction exists now in Revised 93 ZO for "Conference and Training Centers." That use is proposed to be relabeled "Training Facility" with the new ZO but levels of review were kept consistent.
#1347	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.03-3-RPA. RURAL RETREAT now being listed under "Education" as replacement for Rural Corporate Retreat is okay to differentiate from the RURAL RESORT use in Lodging. However, if it is to be Permitted/SPEX in ARS, RAR and VAR, then it should be consistent with P/SPEX in ARN.
#1421	3.02.03 Rural Use Table
By: James David	Agreed. Will make change to P/S in ARN for this use.

ID	Section
Tags: staff james.david@loudoun.gov Date:6/1/2021	
#1346	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.03-3-RPA. GOVERNMENT (GENERAL). Added as SPEX in ARN and ARS -- schools? Community center? Pool? Park? Or all or none of the above?
#1543	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Government (general) does not include schools, community centers, pool, or parks, all of which are either listed separately or fall within a separate category (such as civic uses).
#1345	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.03-3-RPA. SMALL BUSINESS, AG AND RURAL under Office, Business and Professional and PERSONAL/BUSINESS SERVICES (several categories) -- Why were these changed in several locations from M or P to P/S? May need additional explanation for the new definition for Small Business, Ag and Rural for the overall intent.
#1422	3.02.03 Rural Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	See Section 5-614 subsection C of existing ZO. Small business uses, as listed in subsection D, which meet all of the conditions in Section 5-614(E) shall be allowed on lots of ten (10) acres or greater, subject to approval of a zoning permit/sketch plan, as defined in Section 5-614(H). If they don't meet that criteria than it's Special Exception.
#1344	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.03-3-RPA. MOBILE VENDOR -- still blank? Meaning food trucks not allowed or still under review? Table 3.02.03-3-RPA. SNACK OR BEVERAGE BARS -- is this meant to include tasting room food, or no?
#1423	3.02.03 Rural Use Table
By: James David Tags: staff james.david@loudoun.gov	Mobile Vendors are still under review. "Snack or beverage bar" is defined as - Establishments primarily engaged in (1) preparing and/or serving a specialty snack, such as ice cream, coffee and/or pastries, frozen yogurt, cookies, or

ID	Section
Date:6/1/2021	popcorn, or (2) serving nonalcoholic beverages, such as coffee, juices, or sodas for consumption on or near the premises. Could apply to some Tasting Room food but would need to know more about the business operation to officially classify.
#1343	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	"Table 3.02.03-3-RPA. BREWERY, LIMITED -- -- Use now ADDED as Permitted to RAR (former A3) and VAR (Village Ag/Residential). This should not be approved until after thorough review of Performance Standards in Section 3.06. Specifically, as discussed and well-documented this use is problematic when permitted in locations that cannot sustain the impacts on health, safety, welfare and traffic. Standards must also be reviewed to add an ""actual"" agricultural requirement in addition to only ""10 acres."" -- Just as CRAFT BEVERAGE MANUFACTURING has now changed status from Permitted to ""P/S"" (Permitted/SPEX) for RC and VC, so should Limited Brewery use. Other Counties have implemented performance standards without challenge from VA Attorney General in five years. With this new Zoning Ordinance it's time for Loudoun to extend protections to citizens for health, safety and welfare as well. "
#1544	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	We are currently working on use regulations for limited breweries, consistent with Code of Virginia 15.2-2288.3:1.
#1342	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	"Table 3.02.03-3-RPA. RESTAURANT, SIT-DOWN. Is the change from ""M"" in the 5/5/21 draft to ""P/M"" in 6/2/21 draft for ARN and ARS place types intended to indicate this would be considered the ""Farm Restaurant"" use previously questioned? If so, then under what circumstances could/should this use as described EVER be Permitted By-Right without Health Department/ODW/VDACS, Fire Safety, Traffic B&D, P&Z and site plan review and inspections in ANY residential area for the health, safety and welfare of both residents and patrons?"
#1424	3.02.03 Rural Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	"Restaurant" is currently listed as P/M in Revised 93 ZO AR-1 and AR-2. Permitted if it is "related to ongoing agriculture" and Minor SPEX if it is considered a Commercial Food and Beverage use. Both instances subject to Use Specific Standards, which will be reviewed at a later date with ZOC.
#1341	3.02.03 Rural Use Table

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	"Table 3.02.03-3-RPA. BAR/LOUNGE -- Was this removed as a separate use and included in ""RESTAURANT, SIT-DOWN"" because there would be no difference between this use and Limited Breweries or Craft Beverage Manufacturing? -- If so, then doesn't that make Limited Breweries and Craft Beverage Manufacturing equivalent to ""neighborhood taverns/bars/pubs"" as previously defined by ""Bar/Lounge?"" If so, this use warrants performance standards regardless of ""Ag designation"" for health, safety and welfare of residents and patrons."
#1425	3.02.03 Rural Use Table
By: James David Tags: james.david@loudoun.gov Date:6/1/2021	Per the Zoning Administrator, establishments have to sell food if they serve alcohol, so they are covered under "restaurant" uses. The Zoning Administrator advised that the proposed distinction of "Bar/Lounge" be removed.
#1340	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.03-3-RPA. ANIMAL SERVICES -- would like REDC and Farm Bureau direct input.
#1426	3.02.03 Rural Use Table
By: James David Tags: james.david@loudoun.gov Date:6/1/2021	Will reach out to REDC and Farm Bureau reps.
#1339	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.03-3-RPA. RURAL RESORT -- changed from M to M/S (nice!)
#1338	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.03-3-RPA. COUNTRY INN. Because the definition 1) specifically includes meetings and private parties in predominately rural area" and "may include full-service restaurant for guests, general public , meetings and private parties, and the current standards include "Private parties for UP TO 100 ATTENDEES, including overnight guests, may be held DAILY at the Country Inn" this use should be M not P/M to ensure all standards are reviewed for health, safety and welfare. In addition, if Banquet/Event Facility is changed to

ID	Section
	SPEX, then this use should as well, as it is being used to circumvent the more intense use without less intense activity.
#1545	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion, and 3.06 should include triggers for SPEX and M along with additional performance standards.
#1337	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.03-3-RPA. CLUSTER DEVELOPMENT. With the removal of this development option from the Use tables, HOW will "Uses" that are incompatible with a Cluster Development be restricted? The list of incompatible uses is too long, but should be acknowledged that not all "Ag" or "rural" uses apply to Cluster developments with tight residential array, limited rural economy lot usability in some cases, and HOA's.
#1546	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	These standards are currently in process and should be addressed in 3.06.
#1306	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, Miscellaneous, any Temporary use should require a minor SPEX.
#1547	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion.
#1305	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com	In cluster developments in both ARN and ARS, Agriculture uses, only these uses should be allowed: Agriculture, Community garden, Horticulture, Stable or Livery, Stable - private, Wayside stand (if operator has grown at least 50% of product,)

ID	Section
Date:5/27/2021	Winery - Virginia farm (but with tasting room/public space of no more than 500 square feet and no more than 10 parking space.)
#1549	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. Should this also include limited breweries with the same thresholds?
#1304	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, NO Waste Related use should be allowed.
#1548	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion, and there is a pending ZOAM for cluster developments.
#1303	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, NO Waste Related use should be allowed.
#1550	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1302	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, any Communication use should be allowed only by SPEX.

ID	Section
#1551	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Note for discussion; also, this conflicts with Mr. Merrithew's comments (1373).
#1301	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, any Utility use should be allowed only by SPEX.
#1552	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1300	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, NO Transportation/Parking uses should be allowed.
#1553	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1299	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, NO Industrial/Production uses should be allowed.
#1554	3.02.03 Rural Use Table

ID	Section
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1298	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, "Arts, Entertainment and Recreation," the only permitted uses should be Art studio and Equestrian event center.
#1555	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1297	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, Education uses, only "Agricultural education or research" should be allowed, and then only by SPEX.
#1556	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1296	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, NO Medical uses should be allowed.
#1557	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.

ID	Section
Date:6/13/2021	
#1295	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, these Government/Non-profit uses should NOT be allowed: Government (general) and Public safety.
#1558	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1294	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, NO Death care uses should be allowed.
#1559	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1293	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, NO Assembly uses should be allowed.
#1560	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.

ID	Section
#1292	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, NO retail uses should be allowed.
#1561	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1291	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, these Personal/Business services should not be allowed: Farm machinery; maintenance and repair services.
#1562	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1290	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, these Commercial/Mixed-Use uses should not be allowed: none of the Animal care businesses, none of the Day Care uses, no Banquet/event facility, no limited brewery, no farm market (off-site production,) no restaurant, no snack or beverage bar, and winery only is less than 500 square feet of public space/tasting room.
#1563	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1289	3.02.03 Rural Use Table

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, these Lodging uses should not be allowed: Bed and breakfast inn, Campground, Country inn and Rural resort.
#1564	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1288	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	In cluster developments in both ARN and ARS, these uses should not be allowed: Religious housing, Rooming and boarding, and congregate housing.
#1565	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion. In addition, there is a pending ZOAM for cluster developments.
#1287	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	Please add a new column: Cluster Option. Some uses that are generally permitted in ARN and ARS are NOT APPROPRIATE for clusters and their residential character. (I'll note these as I go through these tables.)
#1385	3.02.03 Rural Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	We can address permitted uses in cluster subdivisions elsewhere in the ZO such as Use Specific Standards and Zoning Districts chapters.
#892	3.02.03 Rural Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/10/2021	As we remove 'Cluster' and maybe a few other non-uses from the 'Use Table', we need to remain aware that there are uses beyond homes that are allowed in 'clusters'--'agriculture' is one of many. Thus, is there a way to add it back as one or more columns in the table?

ID	Section
#1212	3.02.03 Rural Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	We can address permitted uses in cluster subdivisions in other parts of the ZO such as Use Specific Standards or Zoning Districts. Also, it may be prudent to wait for the outcome of the standalone cluster subdivision ZOAM.
#883	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/8/2021	I disagree with John on several points which he may be advocating. Mobile vendors should NOT be allowed near wineries or breweries. There should be NO outdoor shooting ranges. Commercial solar should NOT be allowed.
#1213	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	Mobile vendors are still under review.
#859	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/6/2021	The tables of Uses actually diverges from the plan in its treatment of the RS. Look at these statements in the Plan, pages 2-111 and 2-112, with respect to the RS and clusters: "The Rural South contains mostly agricultural and equine uses and allows for complementary rural economy uses. This Place Type includes very low-density residential with homes located on large lots that are compatible with the surrounding pastoral character and clustered subdivisions..." And: Residential Density: Up to 1 du / 40 acres Residential Cluster Option: Up to 1 du / 15 acres equivalent While other uses such as "tenant dwellings," are treated differently between RS and RN, clusters are the clearest example of the new Uses not aligning with the Plan. Why did this happened? It makes us in the RN feel like red-headed step-children.
#1214	3.02.03 Rural Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Cluster is not treated as a use and is now removed from the use table. This concern will be addressed in 3.06 or the development standards.
#831	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Community Gardens should be permitted everywhere. Why would we restrict these?

ID	Section
#830	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Why is Cultural Tourism permitted in the RN not the RS? I believe most of our historically significant sites are in the RS?
#829	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Art Studios should be permitted in RN and RS
#828	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Why is Agritainment permitted in the RN and not the RS?
#826	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	I'm confused by no allowances for farm market off site production.
#824	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Banquet/Event Facilities need to be more restricted and adhere to locations with appropriate road access and parking facilities. Size is important and a banquet facility on the boarder of a neighborhood in the RPA negatively impacts the public perception of all rural businesses. Allowing these facilities to open within neighborhoods where parking is not available and the use overall is inappropriate needs to be not allowed. Just because rural lots are larger does not mean it is comfortable or appropriate for rural residents to live next door to a banquet facility.
#1566	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion.

ID	Section
#823	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Why are banks or lending institutions allowed in RC but not VC?
#822	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Similar to the issue with caretaker housing, tenet housing on large farms should be considered.
#1215	3.02.03 Rural Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	This is listed as permitted in all of the Rural / Ag districts except RC and VC.
#821	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Why are we allowing Rural Hamlets in the RN but not the RS?
#1216	3.02.03 Rural Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Rural hamlets are removed as a use.
#820	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Why are we not allowing manufactured housing? This is often a more affordable option to build a home.
#819	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	I'm guessing there are some holes in the information filled in here? Why would Dwellings not be P in RN and RS?

ID	Section
#818	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Why are we only allowing clusters in RN? Other than the money around Middleburg what justification could exist for putting density in one area of the RPA? If we are taking cluster options off of the table for the RS without fear of lawsuits than we can do the same for the RN and remove the option all together.
#1217	3.02.03 Rural Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Cluster is removed as a use and will be addressed elsewhere in the ZO (3.06 or the Development Standards).
#817	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Why do we not allow caretaker housing in RN or RS? It is very appropriate for large farms and equestrian facilities.
#816	3.02.03 Rural Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Again, looking at this from the perspective of a layperson, the definitions of the place types need to be included. Maybe if you just had a pop up of at least the full title if a user moved their cursor over the abbreviation? If someone last worked with our zoning when their parcel was in AR-1, they will not have the knowledge to use this and determine what we call that now from the information offered here.
#1567	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	Refer to enCode - we can hyperlink definitions, but I'm not sure if we do a separate hyperlink for placetypes (I think she means the zoning districts) unless we marked them as definitions. For ARN, I tried using the hyperlink button and inserted the URL for the ARN district - I've asked enCode to confirm that that would work.
#806	3.02.03 Rural Use Table
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/5/2021	Why no Religious Housing in the Rural Area? It would seem that a convent or monastery with limited traffic would be right for the rural area.

ID	Section
#800	3.02.03 Rural Use Table
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:5/5/2021	Co-housing: This use is not defined in 3.03, and is problematic. There are definitely co-living opportunities (all units being in the same building, sharing some common spaces) that could be appropriate in a suburban mixed use or urban place type, but would definitely not be appropriate in the rural area. Two separate definitions could solve this problem.
#1219	3.02.03 Rural Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Co-housing is removed as a listed use and should be addressed in the use standards (3.06) or development standards.
#792	3.02.03 Rural Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/4/2021	<p>"3.02 GENERAL. "First pass executed to strip standards out of definitions." – Brewery, Limited still contains regulation requirement of "10 acres.""</p> <p>COUNTRY INN. Use and Definition. There is insufficient information in the definition and table to evaluate how the "Permitted/Modified" designation will be applied, evaluated during application, and most importantly, enforced. Due to applications that "stretch" the actual intended application of the use, will the definition be made more clear to define actual scale of use?</p> <p>https://loudouncoalition.org/wp-content/uploads/2020/04/RuralZoningComparison-3-15-2017.pdf</p> <p>RURAL RESORTS. Performance standards for Country Inn and Rural Resorts are INCONSISTENT: Hours of operation, noise, water/wastewater, application requirements. This must be fixed during ZOR. https://loudouncoalition.org/wp-content/uploads/2020/04/RuralZoningComparison-3-15-2017.pdf</p> <p>SOLAR FACILITY, COMMERCIAL. Why are SPEX uses identified in TPA Industrial (TIE) and Leesburg Industrial (JLMA-LI), but not UPA/SPA? Commercial Solar Arrays should be SPEX in ALL areas of the County. WHEN performance standards are developed, will additional P, M, or S locations in UPA/SPA be identified/expected? The definition needs a little work to be more clear/specific. CLUSTER DEVELOPMENT. Rural Use Table, 3.03.03. Why is this listed as a "Use?" Why is this Cluster Development "Use" listed a Permitted in Rural North (RN), but not indicated for Rural South (RS)? How will the "use" be differentiated in its UPA/SPA application?</p>
#1220	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	10-acre definition for Limited Brewery in 3.03 will be moved to the use regulation in 3.06. Performance standards for country inns should be addressed in 3.06. Performance standards for rural resorts should be addressed in 3.06. Performance standards for commercial solar facilities should be addressed in 3.06. Cluster is deleted from the use table.
#759	3.02.03 Rural Use Table

ID	Section
<p>By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:5/3/2021</p>	<p>Accessory dwelling should be permitted in all residential districts. Define cottage court and co-housing. Live-work units should be permitted in all rural commercial and village residential districts. Manufactured housing should be permitted in all residential districts. Guest farm should be permitted anywhere farms are permitted. Short term rentals should be permitted in any residential district. Not clear why we should separate village residential from village commercial. That's not how villages developed. Allow large-animal care wherever farms are allowed. Allow SFD in RN & RS. Restaurants in RC, RV, VR, VC. Mobile vendors allowed where wineries and breweries are permitted. Under Business Services, Farm Machinery needs an action - sales, repair... should also be under retail. Allow light vehicle repair by SPEX in commercial areas. Add vocational schools under education and remove from Personal Instruction. Add outdoor shooting ranges. Cultural tourism doesn't seem to be a use. Should be a category. Wood, metal, stone craft should be permitted in any commercial district. What's the difference between "bottled water" and "water extraction"? Should be classes as extractive industry. Neither should be permitted in the County. Commercial solar should be permitted by SPEX or with tight standards. I don't see a functional distinction between a Farm Distribution Hub and a Cooperative operation.</p>
#1221	3.02.03 Rural Use Table
<p>By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021</p>	<p>Accessory dwelling to be addressed in 3.04. Cottage court and co-housing are removed as uses. Revised to allow live-work units in all rural commercial and village residential districts. Revised to allow manufactured housing in all residential districts. Revised to allow guest farms where farms are permitted. Short term rentals are pulled from the use table pending further direction. See crosswalk document – could someone from staff respond? Revised to allow animal care business in all rural and village districts to match permitted locations of agriculture. Revised to allow single-family detached in ARN and ARS. Revised to allow Restaurants in RC, RV, VR, and VC. Mobile vendors are pulled from the use table pending further direction. The definition of "Farm machinery" already includes sales, and moving it to retail creates a duplicate listing. Revised to allow light vehicle repair in RC and VC. Vocational schools were combined with "business / technical school." Which districts? Note: this conflicts with comments by Charlie Houston. Cultural tourism includes events, facilities and activities that are consistent with the other uses in the sub-category. Revised to allow wood, metal, stone craft in RC and VC. "Bottled water" involves bottling onsite, while "water extraction" sells the water offsite. I suggest a discussion with the full board on whether we prohibit these completely. Note that this contradicts comments by Charlie Houston. I agree that Farm Distribution Hub and a Farm Co-operative are very similar. Could someone from zoning administration clarify why these are listed separately?</p>
#749	3.02.03 Rural Use Table
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021</p>	<p>Household living: Are hamlets in the north just to accommodate grandfathered hamlet projects? Will the zoning map carefully limit hamlets to their existing locations?</p>

ID	Section
#1226	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	Rural Hamlets are removed as a use. Chapter 9 will address nonconformities.
#748	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Miscellaneous: Once again, we need to see the constraints and requirements. Without them I can imagine such things as a circus appearing on Route 9 and maintaining that its 9-month stay is just temporary!
#1227	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	To be addressed in 3.05. Note to James: remove temporary uses here and just address this in 3.05, like we are doing with accessory and open space uses?
#747	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Waste related: Given current problems with abusive stockpiling of dirt, why is this even considered for RN and RS?
#1228	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	Currently allowed by S in AR-1 and -2. Keep?
#746	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Infrastructure: Solar facility, site-specific: What exactly is this, and how is it limited?
#1229	3.02.03 Rural Use Table
By: Mark White Tags:	Defined in 3.03.

ID	Section
mwhite@planningandlaw.com Date:5/25/2021	
#745	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Industrial: Why is commercial water extraction even considered as a permitted use, given the existential threats to our water supplies?
#744	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Personal Instructional Services: Very glad to see that Rural Retreats are not permitted in RN and RS.
#743	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Personal & Business Services: Require a Minor special exception for Maintenance & Repair Services.
#1230	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	Added to RC. Others?
#742	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Food and Beverage: Breweries: They are rife with traffic safety and other problems. Landowners might say they are necessary to provide income that enables them to keep their land, but that is ridiculous; there are many, many other quasi-commercial uses available to them, just in this section. Let's quit nibbling at the edges, say we already have enough breweries and do not allow any more! quit allowing them.
#1231	3.02.03 Rural Use Table

ID	Section
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	Limited Breweries will be regulated by 3.06.
#741	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Food & Beverage: All these uses need upper limits on size, such as number of seats in a Restaurant, Sit-down. Banquet/Event Facilities: Require a SPEX Restaurant: Require SPEX or perhaps approval by PC
#1568	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	Noted for discussion, and we can address these in 3.06
#740	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Why are Short Term Residential Rentals listed but not shown as permitted in any district?
#1232	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	To be addressed by pending ZOAM
#739	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Further comments on Lodging: Campground, Bread & Breakfast Inn, Guest Farm and Rural Resort should all require Special Exceptions. Why? To deny abusive applications.
#1569	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/14/2021	Noted for discussion.

ID	Section
#738	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Almost every use in the Lodging section has been abused by entrepreneurs and developers. Without specificities on scale it is impossible to comment fully. That said, the especially problematic uses (i.e., the ones most likely to be abused) are Bread & Breakfast Inn, Campground, Country Inn and Rural Resort. In fact, why do we even have some of these uses? Rural Resort seems unnecessary as does Country Inn. What is our goal here? Is it to promote tourism? If so, how much tourism do we really want? (See "Bear Chase) Is it to allow entrepreneurs to make money?
#1233	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	To be addressed in 3.06
#737	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Single family detached houses are not shown as permitted used in the RN or RS. While I think that's great, it's probably an oversight.
#736	3.02.03 Rural Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	Cogent comments are difficult when we do not see criteria such as density, limits on number of seats in a restaurant, size limits on other things, etc.
#1234	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	Is this to the restaurant uses? Standards are to be addressed in 3.06.
#729	3.02.03 Rural Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	Are we tip-toeing around 'RS' relative to clusters and hamlets?

ID	Section
#1235	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	These are removed as separate uses.
#728	3.02.03 Rural Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	Should 'religious housing' be permitted in 'RN' & 'RS'?
#727	3.02.03 Rural Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	should go with saying that 'single-family dwellings' should be permitted in all districts
#726	3.02.03 Rural Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	'accessory dwellings' should be permitted throughout (of course depending upon availability of adequate soils for septic)
#1236	3.02.03 Rural Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/25/2021	To be addressed in 3.04
#13650	3.02.02 Transition and JLMA Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add solar, commercial to JLMA commercial and transition districts as a special exception use (excluding TCC).
#13634	3.02.02 Transition and JLMA Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org	Add energy storage and batteries as a use in the Transition and JLMA policy areas.

ID	Section
Date:7/18/2022	
#10854	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	3.02.02-2: Equestrian Event Facility. Currently prohibited in Transition/JLMA-LE. REDC recommends that use be allowed by-right (P) or minor spex (M).
#10472	3.02.02 Transition and JLMA Use Table
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/4/2022	Can't seem to see all of the JLMA use table. Some columns are cut off.
#9756	3.02.02 Transition and JLMA Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	"Cultural tourism" is not defined, and should be.
#9755	3.02.02 Transition and JLMA Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	"Art Studio" should be P in all districts of all planning areas, but perhaps subject to a maximum size of 2,000 sf. and limited to two artists. The county wants to encourage art, for one thing. Art studios are very low-intensity and add to the fabric of every zoning district. It would be fair to put some restrictions on very large studios with many artists.
#9754	3.02.02 Transition and JLMA Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	The concept of "Agritainment" makes sense, but I suggest requiring an M instead of a P.
#9753	3.02.02 Transition and JLMA Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	While "Small Business" is defined at length, "Small business, agricultural and rural" is not. What do you mean?

ID	Section
#9752	3.02.02 Transition and JLMA Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Country Inn is a category that has been misused. I strongly suggest requiring a SPEX here and in RPA.
#1949	3.02.02 Transition and JLMA Use Table
By: Matt Lawrence Tags: zoc mLawrence@pennoni.com Date:7/6/2021	It appears some Agriculture Uses been removed from the Transition Districts. Would a development like Willowsford with farmettes be allowed under this new ordinance?
#1624	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:6/14/2021	SEE ADDITIONAL COMMENTS posted in Section 3.01, Explanation of Use Table Structure
#1623	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Tags: staff james.david@loudoun.gov 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.
#1375	3.02.02 Transition and JLMA Use Table
By: John Merrithew Tags: zoc 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 Tags: staff mwhite@planningandlaw.com	Restaurant uses need more work. There have been multiple ZOC members that have raised questions.

ID	Section
Date:6/13/2021	
#1336	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.02-2. SOLAR FACILITY, COMMERCIAL not permitted in JLMA-20 near Leesburg Airport is a good move. But why no SOLAR FACILITY, SITE-SPECIFIC that could be on parking or rooftops?
#1417	3.02.02 Transition and JLMA Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Oversight. Thanks for pointing that out.
#1335	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.02-2. MARINA has no use designations in TPA/JLMA, but is still listed, assuming for creeks, lakes, not just Potomac? Should it be removed or is it pending review?
#1414	3.02.02 Transition and JLMA Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Good catch. "Marina" should be removed from this Use Table.
#1334	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.02-2. HEALTH AND FITNESS CENTER and RECREATION, INDOOR-- Why would these need to be a SPEX in TLI (Transition Light Industrial)?
#1416	3.02.02 Transition and JLMA Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Agreed. Will change to Permitted.
#1333	3.02.02 Transition and JLMA Use Table

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.02-2. CULTURAL TOURISM. As indicated when this was a ZOAM for Eco-tourism discussed by ZOAG, being Permitted in 9 TPA/JLMA place types, and 4 RPA place types does not take into consideration 1) the intensity of the Farm Based tourism use in residential areas and HOAs, and 2) the viability of Eco-tourism activities within residential areas and HOAs. For these reasons, this should be considered at a minimum a P/M if not M or S.
#1506	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Could we also address eco-tourism impacts in 3.06 instead of breaking it into separate use categories?
#1332	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.02-2. AGRITAINMENT -- Listed with 7 permitted and 1 SPEX (JLMA-LE) in TPA/JLMA. Why, if the definition is for this to be "directly associated with an ongoing agricultural use on-site," would this be permitted without ensuring the Ag Use is in these place types? Should be at least considered for P/M?
#1507	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	I may have missed the point here, but the current draft does allow agriculture in the same Transition/JLMA districts where agritainment is permitted (TSN allows agriculture but not agritainment).
#1331	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.02-2. RURAL RETREAT -- Why would this be a permitted use in TCC (Transitional Community Center)?
#1418	3.02.02 Transition and JLMA Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Agreed. "Rural Retreat" removed from TCC.
#1330	3.02.02 Transition and JLMA Use Table

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.02-2. SMALL BUSINESS, AG AND RURAL under Office, Business and Professional and PERSONAL/BUSINESS SERVICES (several categories) - - Why were these changed from S to P/S? May need additional explanation for the new definition for "Small Business, Ag and Rural" for the overall intent.
#1419	3.02.02 Transition and JLMA Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	See Section 5-614 subsection C of existing ZO. Small business uses, as listed in subsection D, which meet all of the conditions in Section 5-614(E) shall be allowed on lots of ten (10) acres or greater, subject to approval of a zoning permit/sketch plan, as defined in Section 5-614(H). If they don't meet that criteria than it's Special Exception.
#1310	3.02.02 Transition and JLMA Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	Do not permit commercial solar, even if a SPEX is required.
#1383	3.02.02 Transition and JLMA Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	"Solar facility, commercial" has been added to the proposed use tables as a special exception utility use in industrial zoning districts. This is consistent with how a solar facility has historically been treated as a utility electrical generating plant.
#1309	3.02.02 Transition and JLMA Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	Surprised to see that Adult Entertainment is permitted in a few places. Not good.
#1384	3.02.02 Transition and JLMA Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Supreme Court ruled that while zoning may create adult zones or limit the placement of adult entertainment businesses within a community, the community may not zone them out completely or restrict them to small and highly inaccessible areas. First Amendment.
#1308	3.02.02 Transition and JLMA Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	I dislike the entire concept of "Agritainment." If we can't define specific uses, there should not be such a broad catch-all use that is subject to misuse.

ID	Section
#1508	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:6/13/2021	Noted for discussion - possibly refining the definition and including standards in 3.06 to address impacts.
#837	3.02.02 Transition and JLMA Use Table
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:5/5/2021	"Miscellaneous" needs a blue background for the heading
#833	3.02.02 Transition and JLMA Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Why are banks and financial institutions so restricted?
#1196	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Expanded to match locations where Office is permitted.
#832	3.02.02 Transition and JLMA Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Seems like a lot of information must be missing under the household living section?
#1197	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	What information are you referring to?
#811	3.02.02 Transition and JLMA Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	The key at the top of the table needs to move down this very long page with the user. It is difficult to scroll up and down without losing your place.

ID	Section
#1198	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	enCode issue - this is not possible in the Maintenance Module at this time, but the header rows repeat on every page when exported to Word and pdf.
#810	3.02.02 Transition and JLMA Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Why is manufactured housing permitted in so few zones? In a county as expensive as Loudoun, where building a home cost an absolute premium, this is one more way we ensure exclusivity and exclude affordable options?
#1199	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Locations expanded.
#809	3.02.02 Transition and JLMA Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Does the elimination of mobile homes in all zones create additional hurdles for the few existing mobile home parks when it comes to insurance and replacement of destroyed units?
#1200	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	We can address this in Chapter 9 (Nonconformities) later in the process.
#791	3.02.02 Transition and JLMA Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/4/2021	COMMENTS from Staff. It's nice to see Staff comments, but it's undecipherable what they are referring to. I'm pointing this out in anticipation of how the August 2021 Phase III "Public Input" will look. If this method of input within enCodePlus is to be useful there will need to be a way to categorize comments. Otherwise, the end result will be an incredibly LONG list of "comments" -- both informed/useful and some completely unusable/worthless.
#1202	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com	I've put in a feature request to enCode. Right now, there's no option to categorize the comments and that would have to be done manually.

ID	Section
Date:5/24/2021	
#765	3.02.02 Transition and JLMA Use Table
<p>By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:5/3/2021</p>	<p>Put short term rentals everywhere B&B homestays are permitted. Banks should be in TCC and TLI Let there be Bars and Llunges in TCC. Put Limited and craft breweries in TCC and TLI. Allow carry out and fast food w/o drive-through where you allow restaurants. Do we have snack bars? Aren't they convenience stores now? mixed use buildings a are not a use but they should be permitted in TCN, TCC, and TLI. Convenience store with gas sales [and recharge stations] should be in TCC and TLI. A dry cleaning plant is a light industrial use. Dry cleaners could be a service use. I thought non store retailers can operate anywhere? Remove bottled water and water extraction from the ordinance. Intensive manufacturing should not be permitted in the TPA. What is a "miscellaneous" use? By the way, if you forget to put your email on the comment and hit send it erases the comments and rejects the email as invalid. Might want to change that to simply ask for the email.</p>
#1203	3.02.02 Transition and JLMA Use Table
<p>By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021</p>	<p>We are removing STRRs pending adoption of the pending ZOAM. Banks are added to TCC and TLI. The bar/lounge use is removed and added to the definition of Restaurant, sit-down. Limited and craft breweries added as M in TCC and TLI. Carry out and fast food w/o drive-through is revised to allowed where sit-down restaurants are allowed. Snack bars are listed as a distinct category in NAICS and LBCS. Mixed use buildings are deleted as a listed use. Convenience store with gas sales added as S in TCC and TLI, and recharge stations added to definition. Dry cleaning plant is listed under Personal / Business services. Nonstore Retailers are expanded to locations that permit Office. We can address Nonstore Retailers in out of office environments in 3.04. I suggest we discuss bottled water and water extraction with the entire group to see if there is broad consensus to not allow them. Intensive manufacturing removed from Transitional districts. The miscellaneous use category includes a few uses that are not unique to any of the other categories. The issue of have comments prompt for email addresses should be referred to enCode.</p>
#755	3.02.02 Transition and JLMA Use Table
<p>By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:5/3/2021</p>	<p>I assume the tables are a work in process. For example residential is not allowed in JLMA or Transitional, or is that the proposal?</p>
#1204	3.02.02 Transition and JLMA Use Table
<p>By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021</p>	<p>Yes - the tables are in draft form, and residential uses are now applies to the transitional and JLMA districts.</p>

ID	Section
#725	3.02.02 Transition and JLMA Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	'home occupations' should be permitted throughout
#1206	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	To be addressed in 3.04
#724	3.02.02 Transition and JLMA Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	'community gardens' should be permitted through out.
#723	3.02.02 Transition and JLMA Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	What is it about an 'art studio' that would require special exception?
#1205	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	They are currently SPEX in JLMA-1 to -3 and TLN-10. Section 3.04 can distinguish no-impact type artists (such as writing) from those using kilns, outdoor storage, or other activities that could concern neighbors.
#722	3.02.02 Transition and JLMA Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	'Mixed use buildings' would seem appropriate in at least 'TCC'
#1207	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: mwhite@planningandlaw.com	Mixed use is pulled from the use table, and will be addressed elsewhere in the ordinance.

ID	Section
Date:5/24/2021	
#721	3.02.02 Transition and JLMA Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	I must have the wrong impression 'TCC'. Seems 'Food store' and some form of 'restaurant' should both be permitted.
#1208	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	Food store' and sit-down restaurant are added to TCC.
#720	3.02.02 Transition and JLMA Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	should 'farm market' be permitted in 'TCC'?
#719	3.02.02 Transition and JLMA Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	should 'Bank...' be permitted in TCC?
#718	3.02.02 Transition and JLMA Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	Should 'Hotel' be added as permitted or special exception in 'TCC'?
#717	3.02.02 Transition and JLMA Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	It seems clear that the 'Household Living' section is still under consideration by staff and the table is yet to be completed. Correct?
#1209	3.02.02 Transition and JLMA Use Table

ID	Section
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Residential uses are now allocated to the Transitional and JLMA districts.
#716	3.02.02 Transition and JLMA Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	Add 'Accessory Dwelling' as permitted in most if not all these districts.
#1210	3.02.02 Transition and JLMA Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	To be addressed in 3.04.
#13647	3.02.01 Urban and Suburban Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add solar, commercial to suburban commercial districts and brownfield sites as a special exception use.
#13633	3.02.01 Urban and Suburban Use Table
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add energy storage and batteries as a use in the urban and suburban policy areas.
#12297	3.02.01 Urban and Suburban Use Table
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/14/2022	Where Data Center is permitted By-Right, then substation should be permitted by-right. Recognize that dedicated substations are permitted as accessory use but Dominion Power does not typically construct dedicated stations, the power is funneled into the entire grid even when its located on a specific site. The regulation of substations when data center is already permitted is problematic for timing, site permitting etc.....
#12282	3.02.01 Urban and Suburban Use Table
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com	Major Utility should be SPEX use in all districts, including Urban Districts. Major Utilities only locate where they are essential to provide service. They need the

ID	Section
Date:7/14/2022	ability to submit application for review should a future user need major utility in order to sustain their development.
#10493	3.02.01 Urban and Suburban Use Table
By: russ forno Tags: zoc russ.forno@ofplaw.com Date:7/5/2022	May very likely have been mentioned already. Allow pop-ups when you hover over the zoning acronym to spell out the acronym, and provide a hotlink bank to the zoning district bulk reqs. This could be applied throughout the ZO.
#10471	3.02.01 Urban and Suburban Use Table
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/4/2022	Why is a medical care facility a permitted use and a medical office not?
#10470	3.02.01 Urban and Suburban Use Table
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/4/2022	"Restaurant fast food excluding drive-through" is the same as a carry out restaurant and could be deleted from the table.
#10468	3.02.01 Urban and Suburban Use Table
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/3/2022	Is there a way to freeze the zoning district heading so we can see it continuously as we scroll down the uses?
#10467	3.02.01 Urban and Suburban Use Table
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/3/2022	Does the state code allow us to require special exceptions for residential uses? The "manufactured Home" link send you to floodplain standards.
#10024	3.02.01 Urban and Suburban Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/26/2022	Why does "tenant dwelling" on the UPA/SPA table link to the Use-specific standard for multi family dwelling? https://online.encodeplus.com/regs/loudouncounty-va-crosswalk/doc-viewer.aspx#secid-1375

ID	Section
#9751	3.02.01 Urban and Suburban Use Table
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	an "Urban deck" should be in Infrastructure. It should also require a SPEX and appropriate DOT of LoCo approval since it would span over roadways. (Per definition.)
#5978	3.02.01 Urban and Suburban Use Table
By: John Merrithew Tags: zoc Date:11/12/2021	The SME use district is missing from the use table. The SR-1 to 8 are missing from 2.02. A-3 is missing from 2.04.
#1951	3.02.01 Urban and Suburban Use Table
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:7/6/2021	In the footnotes of the Urban and Suburban Policy Areas Table, Suburban Employment is followed by an (SC) as opposed to an (SE).
#10510	3.02.01 Urban and Suburban Use Table
By: Mark Holland Tags: staff mark.holland@loudoun.gov Date:7/5/2022	Revised accordingly.
#1642	3.02.01 Urban and Suburban Use Table
By: John Merrithew Tags: zoc 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 Tags: staff james.david@loudoun.gov 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 Tags: zoc 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?

ID	Section
#1664	3.02.01 Urban and Suburban Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	Updated so that "Dwelling, single-family detached" is now by SPEX in UM district.
#1622	3.02.01 Urban and Suburban Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Tags: staff james.david@loudoun.gov 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.
#1574	3.02.01 Urban and Suburban Use Table
By: Jean Ault Tags: zoc jean.ault@gmail.com 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 Tags: staff james.david@loudoun.gov 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.
#1573	3.02.01 Urban and Suburban Use Table

ID	Section
By: Jean Ault Tags: zoc jean.ault@gmail.com 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 Tags: staff james.david@loudoun.gov 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.
#1572	3.02.01 Urban and Suburban Use Table
By: Jean Ault Tags: zoc jean.ault@gmail.com 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 Tags: staff james.david@loudoun.gov Date:6/15/2021	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. This spectrum of Group Living/Household Living uses varies from Permitted to SPEX depending on the use and zoning district.
#1502	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com 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 Tags: staff james.david@loudoun.gov Date:6/15/2021	See previous reply from Mark White
#1482	3.02.01 Urban and Suburban Use Table

ID	Section
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com 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 Tags: staff mwhite@planningandlaw.com 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 Tags: zoc joepaciullizoc@gmail.com 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 Tags: staff mwhite@planningandlaw.com Date:6/11/2021	Added.
#1376	3.02.01 Urban and Suburban Use Table
By: John Merrithew Tags: zoc Date:6/1/2021	Where is heavy equipment repair?
#1500	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com 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.
#1329	3.02.01 Urban and Suburban Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.01-1. Urban/Suburban Use Table. SOLAR FACILITY, COMMERCIAL -- Use was added as SPEC to Suburban Ag/Residential (former A3). It appears there are 4 areas along the Potomac River with this zoning, some open/vacant, some dense residential. This may need a "hold" until the Solar Array BMI workplan is integrated in the Zoning Ordinance Rewrite to preclude premature applications.

ID	Section
#1410	3.02.01 Urban and Suburban Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Good point. This use may need to be removed from SAR pending outcome of Solar Array BMI work plan.
#1328	3.02.01 Urban and Suburban Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.01-1. Urban/Suburban Use Table. Were the majority of changes in UPA/SPA "EDUCATION" and "MEDICAL" uses from "Permitted" to "SPEX" primarily based on Comp Plan Place Type analysis?
#1413	3.02.01 Urban and Suburban Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	No. Changes in these instances were based on deeper analysis of how the Revised 93 ZO treats these uses. In many cases If a use is a Special Exception in the Revised 93 it is now reflected as the same in the proposed Use Tables. Open to discussion moving forward. Staff will also bring recommendations on how uses could change to better align with 2019 GP at second ZOC meeting in June.
#1327	3.02.01 Urban and Suburban Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.01-1. Urban/Suburban Use Table. With the removal of "BAR/LOUNGE" from the Use Table and definitions, how will "taverns, hookah lounges or neighborhood taverns/bars/pubs" be classified in UPA/SPA? Not all would be manufacturing (brewery or craft beverage), and not all are "restaurants". Or does removed indicate they are no longer permitted?
#1411	3.02.01 Urban and Suburban Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Per the Zoning Administrator, establishments have to sell food if they serve alcohol, so they are covered under "restaurant" uses. The Zoning Administrator advised that the proposed distinction of "Bar/Lounge" be removed.
#1326	3.02.01 Urban and Suburban Use Table
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	Table 3.02.01-1. Urban/Suburban Use Table. A number of uses were changed from Permitted to Special Exception (vs. M/S) in Suburban Employment. What were the changes based on? (e.g., Personal Services, Dry cleaning, convenience store in Suburban employment.)
#1412	3.02.01 Urban and Suburban Use Table

ID	Section
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Changes in these instances were based on deeper analysis of how the Revised 93 ZO treats these uses. In many cases If a use is a Special Exception in the Revised 93 it is now reflected as the same in the proposed Use Tables. Open to discussion moving forward.
#1324	3.02.01 Urban and Suburban Use Table
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:5/31/2021	As a functional suggestion, is it possible to have the purple table header remain static as you scroll?
#1381	3.02.01 Urban and Suburban Use Table
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Yes. We have submitted that request to enCode tech support.
#1307	3.02.01 Urban and Suburban Use Table
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/27/2021	Water extraction should not be allowed anywhere in the county.
#807	3.02.01 Urban and Suburban Use Table
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/5/2021	It would be nice if the zoning districts were defined at the bottom of the table or spelled out as you scroll over the definition.
#854	3.02.01 Urban and Suburban Use Table
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/5/2021	Looks like once I reply to a comment, no one can reply again to the original comment. It is not readily or easily apparent that my comment is attached to the one above it. They are separated by a single line instead of double line. That is the only difference.
#838	3.02.01 Urban and Suburban Use Table
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:5/5/2021	"Commercial/Mixed Use" text is missing in the its heading

ID	Section
#1156	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	The heading displays as intended now
#827	3.02.01 Urban and Suburban Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	In both the UPA/SPA and the RPA section there is not enough support for getting farm products grown in Loudoun into the hands of consumers. Farmers Markets and farmers markets off site production should be permitted more widely.
#1157	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Added to more districts in the table.
#814	3.02.01 Urban and Suburban Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	Going by the definitions and Animal care business would include establishments like dog groomers, a business that would likely do well in many of these areas, why do we not allow them?
#1158	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Locations expanded.
#813	3.02.01 Urban and Suburban Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	If we are serious about affordable housing options it would make sense to have an option for a community land trust community. We should have a place for that or another creative financing and co owned community as many of our neighboring districts with large populations have done. I might be wrong but wouldn't we need to spell out those possible uses here if they were to be a possibility?
#1159	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com	A community land trust is not a separate use, but rather a way of organizing the uses. We can address them in Chapter 8, or in 3.06 for housing types.

ID	Section
Date:5/24/2021	
#812	3.02.01 Urban and Suburban Use Table
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	If the intent is for a true layperson to use this database then either before the tables begin or within the definitions the abbreviations for the various zoning districts needs to be defined as well. Just having them on the tables is fine for us but it assumes a knowledge level.
#1160	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	A footer is added with these descriptions.
#797	3.02.01 Urban and Suburban Use Table
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:5/5/2021	Could some buildings in the UT be combo live/work and office? If existing office can be turned into residential, then why not start with a mix of uses in a tower building with a target or sliding scale of desirable office to residential unit ratio?
#1161	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	We can address that in 3.06.
#796	3.02.01 Urban and Suburban Use Table
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:5/5/2021	Dwelling, SFD- I'd distinguish a cottage court from SFD based on size--and wouldn't think regular SFD would be good in a mixed use environment. A cottage court could be detached, but (I'm guessing) at a smaller size, that might be more justifiable.
#1162	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Cottage court is removed as it's a way of organizing the listed uses. We can address them in 3.06.
#795	3.02.01 Urban and Suburban Use Table
By: Gem Bingol	Cottage Court--Also why not in SCN?

ID	Section
Tags: zoc gbingol@pecva.org Date:5/5/2021	
#1163	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Cottage court is removed as it's a way of organizing the listed uses. We can address them in 3.06.
#794	3.02.01 Urban and Suburban Use Table
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:5/5/2021	COTTAGE COURT: There's no definition for Cottage Court. I could imagine that this might look different in the different zoning districts. Why would it not be appropriate in SAR?
#1164	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Cottage court is removed as it's a way of organizing the listed uses. We can address them in 3.06.
#788	3.02.01 Urban and Suburban Use Table
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:5/4/2021	Why is single family attached not permitted in SN? Why is single family detached not permitted in SN or SCN?
#1165	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	These are now added.
#772	3.02.01 Urban and Suburban Use Table
By: Packie Crown Tags: zoc pcrown@bowmanconsulting.com Date:5/4/2021	If a campground is permitted in the SR-1 and SR-2 districts, why not in the SAR district?
#1166	3.02.01 Urban and Suburban Use Table
By: Mark White	Added campground to SAR

ID	Section
Tags: staff mwhite@planningandlaw.com Date:5/24/2021	
#771	3.02.01 Urban and Suburban Use Table
By: Packie Crown Tags: zoc pcrown@bowmanconsulting.com Date:5/4/2021	Why not permit religious housing in the SN district? The rectories of some of the Catholic Churches in Loudoun County are located in single family sections of residential communities near the respective church.
#1167	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Added religious housing to SN.
#770	3.02.01 Urban and Suburban Use Table
By: Packie Crown Tags: zoc pcrown@bowmanconsulting.com Date:5/4/2021	Portable Dwelling/trailer construction is only listed as a permitted use in the Rural Policy Area. Why list it in other policy areas when it is not permitted in the other policy areas?
#1168	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	We kept the unused uses in the tables for internal drafting purposes, and will remove the unused uses for the next draft.
#769	3.02.01 Urban and Suburban Use Table
By: Packie Crown Tags: zoc pcrown@bowmanconsulting.com Date:5/4/2021	Why list Mobile Home in the use list if they would not be permitted in any policy area or zoning district? Does the use and definition need to be included to acknowledge the mobile home community in Lucketts?
#1169	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	They are listed in the draft to show that they are not permitted in the applicable districts. I will add a note to the definition that a "manufactured home" does not include a "mobile home." Chapter 9 will address uses that are no longer permitted (if that accurately describes the Lucketts development).
#768	3.02.01 Urban and Suburban Use Table

ID	Section
By: Packie Crown Tags: zoc pcrown@bowmanconsulting.com Date:5/4/2021	Could pre-fabricated units such as micro units be defined as manufactured housing? Such units are providing options for smaller units in other parts of the country.
#1170	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	Manufactured housing refers to the homes that are built to the HUD Code. If micro units comply with the building code and the district or development standards do not establish a minimum size for the units that precludes them, they would be permitted.
#767	3.02.01 Urban and Suburban Use Table
By: Packie Crown Tags: zoc pcrown@bowmanconsulting.com Date:5/4/2021	The SN and SCN place types permit single family detached units. Why are they not listed as permitted uses in the Use Table.
#1171	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Single family detached units are added to SN and SCN.
#766	3.02.01 Urban and Suburban Use Table
By: Packie Crown Tags: zoc pcrown@bowmanconsulting.com Date:5/4/2021	Single family dwellings are listed as uses permitted in the UM, SN, SCN and SMU place types. Why would accessory units not also be permitted in these place types?
#1172	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	We are moving accessory units to 3.04 and will allow them in UM, SN, SCN and SMU there.
#752	3.02.01 Urban and Suburban Use Table
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:5/3/2021	Section 3.02.01 and 3.02.02: As a point of clarification, if there are no districts where a defined use is permitted by right, special exception or minor exception, then why list it in the use tables? If the intent is to also identify prohibited uses, suggest we add another classification.

ID	Section
#751	3.02.01 Urban and Suburban Use Table
By: Ben Keethler Tags: zoc benkeethler@outlook.com Date:5/3/2021	No use specific standards identified in table 3.02.01-1 or 3.02.02-2, but are present in definitions table 3.03-1
#733	3.02.01 Urban and Suburban Use Table
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:5/3/2021	<p>I believe modular and manufactured homes should be included in definition of SFD as an affordability strategy. Suggest each category of use be defined so the ZA can determine appropriate undefined or unidentified uses. For example: define lodging as short term lodging and add portable or construction trailers in the category since they have a defined period of use. Don't agree that congregate housing or continuing care should be SPEX use everywhere. Why are banks and financial separate from general retail or other category. Mobile vendors should be allowed somehow in all districts. Personal services should be separated from business services and located with general retail uses. Mixed use buildings should be allowed in more districts. Religious land use should be permitted by right with performance standards in more districts. Is rural resort an educational use? Why does a medical care facility need a SPEX in the old MUB/TC district? Vocational school should be permitted in some urban and suburban districts. Merge technical school, business school and vocational school. Service stations and car washes should be by right in commercial districts. Split data centers between accessory and principal uses and allow accessory data centers in all employment uses. Accessory outdoor sales should be permitted in most retail districts. Farm Coops to me is an ownership description and not a land use. Agriculture is an industry and not a specific use. To me adaptive reuse is not a use, it is a construction technique.</p>
#1173	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	<p>Modular housing is already permitted because it is built to the building code. If the County wants a wider range of locations for manufactured homes, we can expand where they are permitted in individual lots or land lease communities. The tables are revised to expand the locations where they are permitted beyond the original table. We are defining every use, and adding references to NAICS and LBCS to assist with interpretation. Where do you believe congregate housing or continuing care should be permitted by right? Banks and financial separate from general retail because they typically have different space and structural needs, and are not considered ground floor active uses in mixed use environments. Mobile vendors are under review. Personal services are included with business services because the other use categories are service oriented in nature – some of which have a personal customer base (which this providing a catch-all). These are removed from the use table. The use table expands the locations of religious land uses. Performance standards are addressed in 3.06, but should not exceed those of other assembly uses. Rural resort is not classified as an educational use, as it is defined in a way that looks more like a lodging type use. Medical care facility is revised from S to P in SM. The use table is revised to expand the locations for vocational schools. Vocational schools are merged into “Business/technical school.” Service stations and car washes are</p>

ID	Section
	revised from S to P in suburban commercial districts. Accessory uses will be addressed in 3.04. A farm co-op includes a central market, with a distribution system that makes it distinct from other uses where farm products are sold. Agriculture is typically considered a use, with activities such as growing crops and livestock for commercial purposes. Adaptive reuse is removed and can be addressed in the use regulations or development standards.
#730	3.02.01 Urban and Suburban Use Table
By: Packie Crown Tags: zoc pcrown@bowmanconsulting.com Date:5/2/2021	Recommend having a static header that appears at the top of the page as users scroll down the use list. This will make the Table easier to understand for the layman.
#1174	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	I am double-checking with enCode, but do not believe that is possible in the maintenance module. Header rows do repeat when the tables are reproduced in pdf and Word.
#715	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	So, I commented on Accessory Uses earlier. Now I see them listed in a general way in the 'Accessory' section being 'Permitted' in all districts. This would seem to imply that any use can be accessory to another. Somehow I do not think this is correct either. How is someone to know that a particular use in any particular district can be considered 'accessory'?
#1175	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	To be addressed in 3.04.
#712	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	'Farm co-ops' should be permitted the same as 'retail, general'
#711	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com	'Farm Distribution Hubs' should be permitted anywhere there are retail operations such as grocery stores, or even in community parks as a weekend farmers market. Let's be sure we are not discouraging farm-to-table enterprise.

ID	Section
Date:5/2/2021	Note also that the same space or structure might have multiple uses from one day to the next.
#710	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	'Community Gardens' should be a permitted use everywhere
#709	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	'Recycling collection centers' need to be more broadly available as a use. Or is it also an approved accessory use at schools, or other locations with sufficient space. Permitted or special exception is SM, SC, SE, & SI.
#708	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	'outdoor storage', 'outdoor storage, vehicles' should be allowed by special exception in SI.
#707	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	'Solar Facility, commercial' should be an S use in SAR
#705	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	Do we have a 'laboratory', 'Research Lab' or similar use which would be entirely appropriate in UT, UM, ands UE etc. districts. Like research labs in Cambridge, MA next to MIT. Or, alternatively expand 'Research & Development' to be permitted in more districts.
#1176	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	The development standards should resolve issue with the scale of those uses in these districts.

ID	Section
#704	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	Why shouldn't 'Art Studios' be permitted in residential areas--even as an accessory use? The definition describes a use which is hardly a problem. Maybe there needs to be a clear definition that would distinguish such a use from a studio in one's home, but in any case, such a home studio should be permitted, even encouraged in residential areas.
#1177	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	Accessory uses will be addressed in 3.04.
#703	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	'Business College', & 'Vocational School' should be allowed uses in some of these districts --
#701	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	Why are 'government (general)' facilities limited to UT?
#700	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	Why are 'civic, social, and fraternal meeting places' so limited in where they can be located?
#699	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	Why not permit 'Machinery & Equipment Sales' in 'SI'
#698	3.02.01 Urban and Suburban Use Table

ID	Section
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	Permitted locations for 'alternative lending institutions' seems odd.
#1178	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	Uses reallocated.
#697	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	It would be useful if different parts of the ordinance could be open simultaneously as tabs, so that one could jump back and forth without losing ones place. i.e. As I look at the uses, I need also to look at definitions, or, later on, 'standards' associated with uses. Now, as it stands, I am constantly having to scroll back to where I left off, which becomes increasingly burdensome the farther down the chart I go.
#1181	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Refer to enCode - I don't think this is possible.
#696	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	It would be helpful if the district headings remained visible as you scrolled down the chart. Actually it is important!
#1179	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	As far as I know, this is not possible in the enCode maintenance module.
#695	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	If a 'campground' is appropriate in SR-1 & SR-2, why not in SAR?

ID	Section
#694	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	Will there be a description of the various zoning districts in the ordinance--similar to definitions?
#1180	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Yes - in Chapter 2
#693	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	Where 'live/work dwellings' are permitted should be discussed further. For example, if in SCN, why not is SN?
#691	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	Why aren't single family dwellings listed as a permitted use in SAR. Other dwelling types may also be appropriate to add.
#690	3.02.01 Urban and Suburban Use Table
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/1/2021	What is a 'cottage court'--I do not see a definition in 3.03, so I don't understand its applicability in the Use Table
#1182	3.02.01 Urban and Suburban Use Table
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Removed - can address in development standards or use regulations.
#789	3.02 Use Tables
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:5/4/2021	Assume this just a section heading? I don't see anything but that on this page.

ID	Section
#786	3.02 Use Tables
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/4/2021	The overlay districts need to be shown; they need careful thought. Some uses that are permitted in RN and RS might not be appropriate for, say, the Mountainside Overlay District.
#1382	3.02 Use Tables
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Good point. We will be bringing draft Overlay Districts language forward at a later date, which may further regulate uses in these areas.
#12305	3.01 Uses Generally
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/14/2022	We don't support multiple principal uses, particularly in the RPA, where the combination of offsite impacts would be detrimental to neighboring properties.
#9796	3.01 Uses Generally
By: Charlie Houston Tags: zoc CharlesHosuton3@yahoo.com Date:4/23/2022	General comment: For any use, even permitted ones, notice must be given to neighbors before a zoning letter is issued.
#9750	3.01 Uses Generally
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	"Maintenance and Repair" should be defined. Maintenance of apartments and truck repair, for example, are vastly different uses.
#9749	3.01 Uses Generally
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/23/2022	Banquet/event facilities should always need a SPEX.
#9748	3.01 Uses Generally
By: Charlie Houston	Hotels should require SPEX in all districts.

ID	Section
Tags: zoc CharlesHosuton3@yahoo.com Date:4/23/2022	
#2088	3.01 Uses Generally
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:7/7/2021	RPA - Single Family Dwelling - farms are different and should not have parking maximums
#1620	3.01 Uses Generally
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Uses Generally
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	Understood. Hopefully you didn't work too hard on Sunday - Happy belated birthday!
#1619	3.01 Uses Generally
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Uses Generally
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	Will keep working on it per response to Kevin.
#1618	3.01 Uses Generally
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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?

ID	Section
#1677	3.01 Uses Generally
By: James David Tags: staff james.david@loudoun.gov 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 Uses Generally
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Uses Generally
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	Will fix
#1616	3.01 Uses Generally
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com 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 Uses Generally
By: James David Tags: staff james.david@loudoun.gov 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 Uses Generally
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:6/14/2021	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).
#1680	3.01 Uses Generally

ID	Section
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	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.
#1613	3.01 Uses Generally
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:6/14/2021	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 & down, up & 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?
#1681	3.01 Uses Generally
By: James David Tags: staff james.david@loudoun.gov Date:6/15/2021	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.
#763	3.01 Uses Generally
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/3/2021	G.1 – Is it important that these reference documents are followed in this order? Maybe G.1 could simply say that the Zoning Administrator will refer to the following documents in determining a use not defined in the Zoning Ordinance. G.2 – I think that this needs more discussion. Should unlisted and undefined uses be left to the Zoning Administrator’s interpretation as “substantially similar to.”? Is there still a section in the ZO that discusses the ZA’s ability to create determinations?
#1143	3.01 Uses Generally
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/23/2021	In most zoning ordinances, the ZA interprets the regulations as part of their day to day administration of the ordinance. We can discuss alternatives to the draft process and reference documents.
#1356	3.01 Uses Generally
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/31/2021	I guess it is still important that these references be consulted in this order?
#1484	3.01 Uses Generally

ID	Section
By: Mark White Tags: mwhite@planningandlaw.com Date:6/11/2021	It's listed so that the NAICS/LBCS comes into play only where a use does not have a well-understood meaning. The dictionary is the most common reference for this. However, we could just list both without stating what order or preference they take.
#1355	3.01 Uses Generally
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/31/2021	My comment about defining all the row colors was addressed, however, it is addressed under "1. Use Classification." Why are "Use Categories" and "Use" also defined under "1. Use Classification."? Why not just let them be defined under items 2. & 3.?
#1485	3.01 Uses Generally
By: Mark White Tags: staff mwhite@planningandlaw.com Date:6/11/2021	The statement in the last sentence of subsection 1 relating to "Use Categories" and "Use" are defined in that subsection ("1. Use Classification.") because it's an introductory statement that relates to both subsections 2. & 3.?
#1325	3.01 Uses Generally
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/31/2021	"Table 3.01-1 Key to Use Table. Special Exception definition is improved. ""P/S and P/M"" are clear as Permitted w/ Special Exception and Permitted w/ Minor Special Exception. What is an example of circumstance for ""M/S"" Minor Spex with Special Exception?"
#1409	3.01 Uses Generally
By: James David Tags: staff james.david@loudoun.gov Date:6/1/2021	Example: "School, private, accessory to a church" is a special exception use in existing RC zoning. However, a "Public School" is allowed by minor special exception in existing RC zoning.
#808	3.01 Uses Generally
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:5/5/2021	There are a lot of blank spaces in the existing charts. Are these awaiting determination? Section G is problematic. If we are leaving undefined uses up to the determination of the zoning administrator and the application of definitions that may or may not apply to our rather unique county. This makes me wonder if need an accompanying list for known specific variations on a use that coopted it and broke with the intention or purpose of both the use and the location it is in.
#1136	3.01 Uses Generally
By: Mark White Tags: staff	The blank spaces are for interim drafting purposes, and we will remove them before the next iteration of the Use Table. As to undefined uses, the intent is to

ID	Section
mwhite@planningandlaw.com Date:5/23/2021	define uses as specifically as possible to avoid having to use this provision. Subsection G.1 is limited to situations where a proposed use is not specifically listed, but is actually a defined use.
#801	3.01 Uses Generally
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/5/2021	Are there plans for any graphics in the definitions/use terms?
#1137	3.01 Uses Generally
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/23/2021	The specific graphics are not determined yet.
#790	3.01 Uses Generally
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:5/4/2021	<p>3.00 GENERAL. Instructions document (from J. David) indicates tables include "how a use is reviewed today" (e.g., P, M, S). What does a blank indicate throughout? (Not permitted? Not yet determined, such as STRR? Or either?). If "blank" means "not permitted," then that needs to be explicitly stated.</p> <p>3.01 GENERAL. I'm assuming DEFINITIONS will be hyperlinked as they are currently in the 1993 ZO enCodePlus? (R93ZO) 3.01.G. USES NOT DEFINED. Draft text conflicts with comments/direction from ZOC the limit the ways to circumvent the ZO by Zoning Administrator or BOS special exception.</p> <p>SHORT TERM RESIDENTIAL RENTALS. I'm assuming inclusion in all policy areas is a "place holder" for the ZOAM, but there will be no STRR's approved before their time? "USE INCONSISTENCIES. Bylaws indicate a key role for ZOC is to identify INCONSISTENCIES and address specific issues. An analysis of Rural Use INCONSISTENCIES was produced in 2017 that is still applicable and likely helpful in 2021. Although this first task is to review Use Tables, understanding where the ""gaps"" between Performance Standards exist may also assist in the assignments of Permitted, Modified or Special Exception. Matrix of RURAL USE Zoning/Performance Standards Inconsistencies can be found here: https://loudouncoalition.org/wp-content/uploads/2020/04/RuralZoningComparison-3-15-2017.pdf. Meetings can/will be scheduled with Staff to review questions and examples."</p>
#1138	3.01 Uses Generally
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/23/2021	Responses: Added that blank cells mean prohibited – good catch! The definitions in 3.03 will be moved to individual "containers" in Chapter 11 (that is the only way to hyperlink them). They are left here now for discussion purposes. G.1 is limited to instances where a proposed use is really an existing use, but simply has another name. G.2 is changed to require a ZOAM. STRRs are removed pending adoption of the ZOAM. The Rural Use analysis is an

ID	Section
	excellent summary and will be referred to as we develop the use regulations. Thank you! Noted as to additional meetings.
#787	3.01 Uses Generally
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:5/4/2021	G. Uses not Defined. This section is problematic as is. Uses "not defined" are not the same as "unspecified uses" in 1-203 per the existing ZO. A major enforcement concern is what the county can do to respond more quickly and effectively to stop an action when an unspecified use has been initiated. In G2 a use could suddenly be very popular, but as we are now learning, it could create widespread problems without careful analysis prior to approving any application to avoid precedent problems.
#1139	3.01 Uses Generally
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/23/2021	Changed to "defined" to "specified or designated"
#785	3.01 Uses Generally
By: Matt Lawrence Tags: zoc mlawrence@pennoni.com Date:5/4/2021	The Tables identified in 3.01-A use the format "3.02-1," but the tables are not labeled as such. For instance, I believe the intent is that 3.02-1 refers to 3.02-01-1.
#1141	3.01 Uses Generally
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/23/2021	Fixed - nice catch!
#784	3.01 Uses Generally
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:5/4/2021	F. Additional Regulations for Specific Uses. References to sections in the final column of a Use Table and defintion--TYPO (Table 3.03-1 of Section 3.03) indicates--NO "S"
#764	3.01 Uses Generally
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:5/3/2021	3.01.B The color (green) for use classification is mentioned, but the other colors are not for categories and uses. In the tables I noticed a blank green row.

ID	Section
#1142	3.01 Uses Generally
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/23/2021	I referenced the other colors and shadings, and do not see a blank green row (it could have been deleted).
#762	3.01 Uses Generally
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:5/3/2021	In the Drafting Documents area is a document titled: Draft Loudoun County Zoning District Names: Current and Proposed. How is this achieved? Is the entire County going to be remapped to the PROPOSED District Name and requirements?
#1486	3.01 Uses Generally
By: Mark White Tags: mwhite@planningandlaw.com Date:6/11/2021	I believe that is the ultimate goal. However, there are options for accomplishing that will be addressed later in the process.
#756	3.01 Uses Generally
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:5/3/2021	In the various tables, will leaving the cell blank mean the use is not permitted or will all cells be filled and a new Key be created for Not Permitted? This section should explain what an empty cell means if that is the direction.
#1144	3.01 Uses Generally
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	It means not allowed in the district - fixed. Thanks!
#735	3.01 Uses Generally
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	The glossary at the end, which explains what the district abbreviations are, should precede the Uses tables. Otherwise people will get confused, especially since some designations are new.
#1146	3.01 Uses Generally
By: Mark White Tags: staff mwhite@planningandlaw.com	Added to top row of each table - great suggestion!

ID	Section
Date:5/24/2021	
#734	3.01 Uses Generally
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:5/3/2021	The Uses run on and on for all the planning areas. I first skimmed things and missed the Rural uses. Others might have the same problem. It would be easier to find things if there was a simple break (blank space or a page break) between planning areas.
#1147	3.01 Uses Generally
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	I have inserted a page break at the end of each use table section. However, for purposes of viewing the uses online in the maintenance module, I do not believe it is possible to split the top row for viewing purposes. Dividing each table into separate sections would take a lot of reworking as uses are added and deleted. When the tables are saved as pdf or Word files, however, the header rows do repeat for viewing page by page.
#731	3.01 Uses Generally
By: john Merrithew Tags: zoc John.merrithew@loudoun.gov Date:5/2/2021	I hope the staff will give us an example of how subsection G will work. I don't understand how Webster's dictionary plays a role. My assumption was an undefined use would be measured by how closely the associated activities such as retail sales and service or outdoor storage, and impacts such as traffic volumes, noise, odor compare to defined uses or the NAICS use categories.
#1148	3.01 Uses Generally
By: Mark White Tags: staff mwhite@planningandlaw.com Date:5/24/2021	Websters would apply when the application is for a use that's different in name only. It's worth discussing whether to add other criteria when that's not the situation - for example, we could consider traffic impacts, impacts on facilities, hours of operation, customer base, etc.
#714	3.01 Uses Generally
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	I don't see any mention of non-principal uses in this chapter. How are they to be addressed? A simplistic thought (though it may not work) would be to add the letter 'A' as a notation in the Use Table.
#1149	3.01 Uses Generally
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	To be addressed in 3.04.

ID	Section
#713	3.01 Uses Generally
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:5/2/2021	Is there a problem with G.2.? If an undefined use can be permitted anywhere by special exception, why can't a defined use also be permitted anywhere by special exception?
#1150	3.01 Uses Generally
By: Mark White Tags: mwhite@planningandlaw.com Date:5/24/2021	Wording fixed - the intent is really to address uses that are not found anywhere in the Use Table, even after an interpretation - which would require a ZOAM.
#13531	2.07 Legacy Zoning Districts
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Eliminate right to build 4 dwelling units to the acre in RC.
#5803	2.07 Legacy Zoning Districts
By: John Merrithew Tags: zoc Date:11/3/2021	Please explain the role of the legacy districts, particularly in the Transition, rural, and JLMA Areas.
#8913	2.07 Legacy Zoning Districts
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/3/2022	Legacy Zoning Districts are defined in Chapter 11.
#5720	2.07 Legacy Zoning Districts
By: Maura Walsh-Copeland Tags: zoc 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: 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

ID	Section
	(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.
#8914	2.07 Legacy Zoning Districts
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/3/2022	All revisions are provided as a comparison to the original text.
#10464	2.06 Planned Development Zoning District
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:7/3/2022	The list of uses permitted anywhere seems narrow. When not refer to all government uses. We might need a emergency services facility. We could also make, AAA facilities and telecommunication facilities allowable.
#9978	2.06 Planned Development Zoning District
By: Packie Crown Tags: zoc pcrown@bowman.com Date:5/11/2022	Section 2.06 states the purpose of the PD Zoning District is to provide a relief valve from prescriptive standards of the Urban and Suburban Zoning District. Section 2.06.C. allows modifications in the TPA districts. Recommend adding the TPA to the Purpose Statement.
#6152	2.06 Planned Development Zoning District
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	When will we see a draft zoning map?
#8917	2.06 Planned Development Zoning District
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/3/2022	This district would not be mapped unless utilized and applied through an approved rezoning request after adoption of the draft ZO; therefore, this district would not be depicted on a draft zoning map.
#6075	2.06 Planned Development Zoning District
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:11/14/2021	Modification of Attainable Housing Regs are not permitted, but I would like to revisit this once we see those regs. It is possible that the PD product might be even better than the Attainable Housing regs (as far as providing affordable/attainable housing).
#8916	2.06 Planned Development Zoning District

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/3/2022	You can only modify the number of ADUs required and the timing of ADU delivery. Anything that would be better (but still meet the minimum requirements) would not necessitate a modification. The County would not anticipate a proposal that achieves a lesser requirement without an approved modification.
#6053	2.05.04 Joint Land Management Area – Leesburg JLMA Industrial/Mineral Extraction – JLMA-LME
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.05.04.F Joint Land Management Area – Leesburg Industrial/Mineral Extraction – JLMA-LME. Pedestrian and Bicycle Network. Again, Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#8886	2.05.04 Joint Land Management Area – Leesburg JLMA Industrial/Mineral Extraction – JLMA-LME
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/1/2022	Bike/Ped regs consolidated under Development Standards. LPAT is referenced.
#6151	2.05.03 Joint Land Management Area – Leesburg JLMA Employment – JLMA-LE
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	Why should streets form grids? (In this and other sections.) I'd prefer curvilinear patterns, which are more appropriate for our terrain.
#8877	2.05.03 Joint Land Management Area – Leesburg JLMA Employment – JLMA-LE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Street pattern is based on corresponding Place Type in 2019 GP.
#6052	2.05.03 Joint Land Management Area – Leesburg JLMA Employment – JLMA-LE
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.05.03.F Joint Land Management Area – Leesburg Employment – JLMA-LE. Pedestrian and Bicycle Network. Again, Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#8874	2.05.03 Joint Land Management Area – Leesburg JLMA Employment – JLMA-LE
By: Kate McConnell	Ped/Bike has been moved to Development Standards. LPAT is referenced.

ID	Section
Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	
#6150	2.05.02 Joint Land Management Area – Leesburg JLMA Residential Neighborhood – JLMA-LN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	Let the Leesburg town limits be a hard edge. Do not allow such high density in County areas.
#8863	2.05.02 Joint Land Management Area – Leesburg JLMA Residential Neighborhood – JLMA-LN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	This district will only be applied in the Leesburg JLMA Residential Neighborhood Place Type and, therefore, is consistent with the 2019 GP.
#6051	2.05.02 Joint Land Management Area – Leesburg JLMA Residential Neighborhood – JLMA-LN
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.05.02.J Joint Land Management Area – Leesburg JLMA Residential Neighborhood. Pedestrian and Bicycle Network. Again, Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#8862	2.05.02 Joint Land Management Area – Leesburg JLMA Residential Neighborhood – JLMA-LN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Bike/Ped Network moved to Development Standards.
#6050	2.05.02 Joint Land Management Area – Leesburg JLMA Residential Neighborhood – JLMA-LN
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.05.02.G Joint Land Management Area – Leesburg JLMA Residential Neighborhood. Siting of Open Space and Building Lots. Open space should be contiguous to protect wildlife corridors and other natural resources. This could also include considerations for potential LPAT connections. Shouldn't this include requirements for siting and resource protection such as the ones included in 2.03.03.F.3 Transition Compact Neighborhood – TCN?
#8864	2.05.02 Joint Land Management Area – Leesburg JLMA Residential Neighborhood – JLMA-LN

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Open Space requirements are moved/addressed in Open Space Standards (5.04). Bike/Ped moved to Development Standards and addresses LPAT.
#6149	2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	Residential densities are too high.
#8855	2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	The residential densities are consistent with the 2019 General Plan.
#6148	2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	Philosophically, why do we even have JLMAs?
#8858	2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	The JLMAs are consistent with the 2019 General Plan.
#6049	2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.05.01.D.4 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3 Neighborhood Development Standards. Civic and Open Space. This section seems rather vague with the use of "variety" multiple times. This could be a place to include connection to LPAT, and an opportunity to require contiguous habitats for the protection of natural and cultural resources. Why are there not siting standards for open space?
#8859	2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Largely proposed for deletion since the requirements are now in the Open Space Standards.

ID	Section
#5740	2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3
By: Rich Brittingham Tags: zoc 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)
#5787	2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#8860	2.05.01 Joint Land Management Area Neighborhood – JLMA-1, JLMA-2, JLMA-3
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/28/2022	Revised language of existing regulation to be more clear about when culs-de sac and P-loops will be allowed.
#6147	2.04.05 Village Commercial – VC
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/16/2021	Good job.
#9350	2.04.05 Village Commercial – VC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	Thank you.
#10981	2.04.03 Village Residential – VR
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	2.04.03 D. VILLAGE RESIDENTIAL. Garages should also be detached as in VCOD regs
#6048	2.04.03 Village Residential – VR
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com	2.04.04.D Village Residential – VR. Open Space. "Open space must be preserved by means of a permanent open space easement acceptable to the Board of Supervisors." This should be subject to similar requirements noted in

ID	Section
Date:11/14/2021	2.03.03.F.3 to protect contiguous habitat and natural and cultural resources. Should this be a conservation easement in order to protect conservation values?
#9331	2.04.03 Village Residential – VR
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	Open Space is addressed in Development Standards, Section 5.04.
#5893	2.04.03 Village Residential – VR
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	2.04.04 - 1. Village Residential. Have these provisions been aligned with the design guidelines for the various historic villages?
#9332	2.04.03 Village Residential – VR
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	The 2019 GP calls for developing small area plans for the villages. Until this time, the regulations cannot address specific village development patterns and remain as currently required by the ZO.
#5892	2.04.03 Village Residential – VR
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	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?
#9333	2.04.03 Village Residential – VR
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	The limits of VCOD, RHV, and VR zoning all vary by village.
#5805	2.04.03 Village Residential – VR
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/3/2021	2.04.04 Village Residential VR1, VR2, VR3, and VR4 are set up too generically, as if the villages have the same development patterns. Also, some of these--VR3 (St. Louis) and VR4 (Lucketts) are each unique to one village. Waterford's development pattern with alleys is very different from that in St. Louis, where there are none. New development has already started to change the look and feel in St. Louis. Care should be taken with these guidelines prior to the additional detail that will come later with community planning.
#9334	2.04.03 Village Residential – VR

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	At this time, we are carrying over current regulations. The regulations will be aligned with villages upon completion of small area plans. I did revise the alley requirement to only apply when it is the prevailing road network pattern of a village.
#5804	2.04.03 Village Residential – VR
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/3/2021	The villages need more variation between VR1, VR2, VR3 and VR4. Some of these zoning districts are unique to a single village, i.e. VR3-St. Louis, and VR4-Lucketts. Waterford has alleys but St. Louis doesn't, and their historic development patterns are quite different. Even if more detail comes later, these guidelines will result in outcomes that may not be suitable in the meantime.
#9335	2.04.03 Village Residential – VR
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	At this time, we are carrying over current regulations. The regulations will be aligned with villages upon completion of small area plans. I did revise the alley requirement to only apply when it is the prevailing road network pattern of a village.
#5789	2.04.03 Village Residential – VR
By: John Merrithew Tags: zoc Date:11/2/2021	I would like to know if connecting to existing village utilities is an option or if those utilities are limited to just the existing, built properties. I recall these utilities have little excess capacity. If this is the case, what policy or regulation changes are needed to allow expansion of the utilities to new development?
#9336	2.04.03 Village Residential – VR
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	Properties in the respective service district are allowed to connect. Allowing other properties to connect would require a CMPT to expand the service district, which would be initiated by Loudoun Water and the County. The 2019 GP supports establishing or expanding service districts to address public health.
#5788	2.04.03 Village Residential – VR
By: John Merrithew Tags: zoc John.merrithew@loudoun.gov Date:11/2/2021	The VR district is intended to complement the Historic Rural Villages but it offers a one size fits all solution, which seems contrary to the objective.It also seems the district is working on the assumption that the HRV's will be seeing larger projects that need a street network. I would suggest offering some context sensitive standards for existing lots and restrict the fixed setback and building standard numbers to new subdivision that has no context/existing development on which to base their standards.
#9337	2.04.03 Village Residential – VR

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	At this time, we are carrying over current regulations. The regulations will be aligned with villages upon completion of small area plans. VCOD also applies in villages with this zoning which does respond to context.
#13585	2.04.02 Agricultural Rural South – ARS
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:7/18/2022	Farm Bureau 2.04.02 H As part of the recognition and protection surrounding the right to farm act add "HOAs in the rural policy area, in a clustered or non clustered development, can not restrict farm production activities beyond the regulations already established in the zoning district."
#6046	2.04.02 Agricultural Rural South – ARS
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.04.02.K Agricultural Rural South – ARS. Common Open Space. Open space should be contiguous within the parcel, but also contiguous to adjacent lands to protect wildlife corridors and other natural resources. This could also include considerations for potential LPAT connections. Shouldn't the Common Open Space include requirements for siting and resource protection such as the ones included in 2.03.03.F.3 Transition Compact Neighborhood – TCN?
#9321	2.04.02 Agricultural Rural South – ARS
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	Cluster Subdivision regulations will be amended with ZOAM-2020-0002, Cluster Subdivision Regulations. Also, Open Space Development Standards should address this.
#9322	2.04.02 Agricultural Rural South – ARS
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	Cluster Subdivision regulations will be amended with ZOAM-2020-0002, Cluster Subdivision Regulations. Also, should be addressed in Open Space Development Standards.
#5890	2.04.02 Agricultural Rural South – ARS
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	My comments on ARN apply to ARS with the exception of density of cluster lots
#9323	2.04.02 Agricultural Rural South – ARS
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	See responses to ARN comments.

ID	Section
#5717	2.04.02 Agricultural Rural South – ARS
By: Maura Walsh-Copeland Tags: zoc 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: 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.
#13583	2.04.01 Agricultural Rural North – ARN
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:7/18/2022	Farm Bureau 2.04.01 H As part of the recognition and protection surrounding the right to farm act add "HOAs in the rural policy area, in a clustered or non clustered development, can not restrict farm production activities beyond the regulations already established in the zoning district."
#13544	2.04.01 Agricultural Rural North – ARN
By: Tia Walbridge Tags: zoc tiawalbridge@gmail.com Date:7/18/2022	Loudoun Farm Bureau 2.04.01.L As previously submitted communal water and sewer systems have undermined the intent of the cluster ordinance for years and often resulted in acres of prime agricultural soils lost in the "preserved Ag lot" or open space to accommodate septic systems for cluster lots that should be using alternative systems and contain their own system within their own lot.
#10503	2.04.01 Agricultural Rural North – ARN
By: Russ Forno Tags: zoc russ.forno@ofplaw.com Date:7/5/2022	I recommend keeping the AR-1 and AR-2 acronyms.

ID	Section
#10489	2.04.01 Agricultural Rural North – ARN
By: russ forno Tags: zoc russ.forno@ofplaw.com Date:7/5/2022	Footnote 2 of Table 2.04.01-1: Suggest it to read 100' from nearest cluster/rural econ lot boundary, instead of measured from dwelling and perhaps get into the weeds of measuring wherefrom.
#6045	2.04.01 Agricultural Rural North – ARN
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.04.01.K Agricultural Rural North – ARN. Common Open Space. Open space should be contiguous within the parcel, but also contiguous to adjacent lands to protect wildlife corridors and other natural resources. This could also include considerations for potential LPAT connections. Shouldn't the Common Open Space include requirements for siting and resource protection such as the ones included in 2.03.03.F.3 Transition Compact Neighborhood – TCN?
#9289	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/29/2022	Open space requirements are located in Open Space Development Standards and should address contiguity. LPAT should be addressed through incentives since the Zoning Ordinance implements the Comp Plan (GP and CTP).
#5889	2.04.01 Agricultural Rural North – ARN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	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.
#9290	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/29/2022	Cluster Subdivision regulations will be amended with ZOAM-2020-0002, Cluster Subdivision Regulations.
#5888	2.04.01 Agricultural Rural North – ARN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	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.
#9291	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff	Cluster Subdivision regulations will be amended with ZOAM-2020-0002, Cluster Subdivision Regulations.

ID	Section
kate.mcconnell@loudoun.gov Date:3/29/2022	
#5887	2.04.01 Agricultural Rural North – ARN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	.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.
#9292	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/29/2022	Cluster Subdivision regulations will be amended with ZOAM-2020-0002, Cluster Subdivision Regulations.
#5886	2.04.01 Agricultural Rural North – ARN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	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.
#9295	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/29/2022	Cluster Subdivision regulations will be amended with ZOAM-2020-0002, Cluster Subdivision Regulations.
#5885	2.04.01 Agricultural Rural North – ARN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	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.
#9293	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/29/2022	Cluster Subdivision regulations will be amended with ZOAM-2020-0002, Cluster Subdivision Regulations.
#5884	2.04.01 Agricultural Rural North – ARN

ID	Section
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	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 hat some lots use alternative septic systems, the added cost would be passed along to the homebuyer.
#9294	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/29/2022	Cluster Subdivision regulations will be amended with ZOAM-2020-0002, Cluster Subdivision Regulations.
#5883	2.04.01 Agricultural Rural North – ARN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	2.04.01 - C What is he logic of the principal-subordinate option? Can't it be eliminated?
#9317	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/1/2022	We are not eliminating the Principal/Subordinate option. This option allows an opportunity not to subdivide all at one time.
#5882	2.04.01 Agricultural Rural North – ARN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	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.
#9296	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/29/2022	This concern should be addressed in the use list.
#5881	2.04.01 Agricultural Rural North – ARN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	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.
#9297	2.04.01 Agricultural Rural North – ARN

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/29/2022	Decision has been made not to revise densities.
#5880	2.04.01 Agricultural Rural North – ARN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	Purpose #3 “Support the use of land for rural economy uses ...with residential uses allowed...” Sacrilege! The economy uses are meant as adjuncts to residences and this statement has it backwards, Does this indicate a troubling mindset?
#9313	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/31/2022	Revised to be more consistent with place type description.
#5879	2.04.01 Agricultural Rural North – ARN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/5/2021	2.04.01 Agricultural Rural North. Note the words “Agricultural” and “Rural,” which seem to be ignored when uses, density and standards were written.
#9314	2.04.01 Agricultural Rural North – ARN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/31/2022	As previously indicated, the ZO rewrite will not be changing permitted densities.
#5716	2.04.01 Agricultural Rural North – ARN
By: Maura Walsh-Copeland Tags: zoc 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

ID	Section
By: Ryan Reed Tags: 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.
#6485	2.04 Rural Policy Area Zoning Districts
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:12/13/2021	Seeing no CR districts mentioned, will they be addressed via VCOD?
#9677	2.04 Rural Policy Area Zoning Districts
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/14/2022	CR is renamed VR.
#6044	2.03.07 Transition Mineral Extraction - TME
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.03.07.F Transition Mineral Extraction - TME. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#8963	2.03.07 Transition Mineral Extraction - TME
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/8/2022	Section moved to Development Standards. LPAT referenced.
#5878	2.03.07 Transition Mineral Extraction - TME
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#8964	2.03.07 Transition Mineral Extraction - TME
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/8/2022	acknowledged
#6043	2.03.06 Transition Industrial – TI

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.03.06.E Transition Industrial – TI. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#8966	2.03.06 Transition Industrial – TI
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/8/2022	Moved to Development Standards; LPAT referenced.
#6042	2.03.06 Transition Industrial – TI
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.03.05.E Transition Light Industrial – TLI. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#8967	2.03.06 Transition Industrial – TI
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/8/2022	Moved to Development Standards; LPAT referenced.
#6017	2.03.06 Transition Industrial – TI
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:11/14/2021	No reason to change setback from roads away from current standard (below). The proposed increase is from 35' to 100' (I assume for both building & parking?). Except where a greater setback is required by Section 5-1403(B), no building shall be permitted closer than thirty-five (35) feet to any road and no parking shall be permitted closer than twenty-five (25) feet to the right-of-way from any road. No outdoor storage, areas for collection of refuse, or loading space shall be permitted in such setbacks.
#8969	2.03.06 Transition Industrial – TI
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/8/2022	This district is in the TPA, where setbacks, buffering, and natural open space are to be used to reduce impacts of the development on the surrounding development pattern. This development pattern is also setback from roads and is intended to provide a transition from the rural to suburban policy areas.
#5877	2.03.06 Transition Industrial – TI
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com	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

ID	Section
Date:11/4/2021	the judgment of ZOC members who know those areas and have stakes there. I am surprised that there are no comments on this area.
#8968	2.03.06 Transition Industrial – TI
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/8/2022	acknowledged.
#6041	2.03.05 Transition Light Industrial – TLI
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.03.05 Transition Light Industrial – TLI. This section has a purpose to "Establish sufficient open space to ensure environmental protection on the site." yet there are no requirement for siting open space. Why is that?
#8974	2.03.05 Transition Light Industrial – TLI
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/8/2022	This district requires 50% of the site to be open space. Siting of required open space is regulated in the Open Space Development Standards.
#5876	2.03.05 Transition Light Industrial – TLI
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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 thee is only one comment on the TPA Light Industrial as it includes data centers, a use that in some ways can be controversial.
#8973	2.03.05 Transition Light Industrial – TLI
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/8/2022	The 2019 GP intentionally included the area subject to the Transition Light Industrial Place Type as a place that would be appropriate for data center development.
#5715	2.03.05 Transition Light Industrial – TLI
By: Maura Walsh-Copeland Tags: zoc 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?

ID	Section
#5818	2.03.05 Transition Light Industrial – TLI
By: Kate McConnell Tags: 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.
#6040	2.03.04 Transition Community Center – TCC
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.03.04.H Transition Community Center – TCC. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#8981	2.03.04 Transition Community Center – TCC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/8/2022	Moved to Development Standards; LPAT referenced.
#5875	2.03.04 Transition Community Center – TCC
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#8982	2.03.04 Transition Community Center – TCC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/8/2022	acknowledged
#5800	2.03.04 Transition Community Center – TCC
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/2/2021	Perimeter setback is too large
#9014	2.03.04 Transition Community Center – TCC

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/9/2022	Revised based on Place Type, which states, "A substantial part of the required open space should provide perimeter screening such as a park or recreation area against other communities and adjacent roads. Transitions should be gradual, particularly where natural or man-made buffers are not available. Appropriate transitional techniques include variations in building orientation, height step down, and creative and extensive use of landscaping and natural features."
#6039	2.03.03 Transition Compact Neighborhood – TCN
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.03.03.I Transition Compact Neighborhood – TCN. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#8987	2.03.03 Transition Compact Neighborhood – TCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/9/2022	Moved to Development Standards; LPAT referenced.
#6038	2.03.03 Transition Compact Neighborhood – TCN
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.03.03.F.3 Transition Compact Neighborhood – TCN. Siting of the Open Space and Building Lots. Just because a place type is more densely populated doesn't mean that wildlife and natural resources wouldn't benefit from these same requirements. This place type includes language to require contiguous habitats and protect natural and cultural resources. Why don't the other place types do the same?
#9051	2.03.03 Transition Compact Neighborhood – TCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/14/2022	The requirement that open space be contiguous should be addressed in the Open Space Development Standards.
#5874	2.03.03 Transition Compact Neighborhood – TCN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#8988	2.03.03 Transition Compact Neighborhood – TCN
By: Kate McConnell	acknowledged

ID	Section
Tags: staff kate.mcconnell@loudoun.gov Date:3/9/2022	
#5871	2.03.03 Transition Compact Neighborhood – TCN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#8989	2.03.03 Transition Compact Neighborhood – TCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/9/2022	acknowledged
#5799	2.03.03 Transition Compact Neighborhood – TCN
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/2/2021	Perimeter setback may be too large. It also may conflict with optimal placement of open space. i.e. it may direct open space to the district perimeter which may or may not be the best location for any number of reasons.
#9017	2.03.03 Transition Compact Neighborhood – TCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/9/2022	Perimeter setback will ultimately only apply along roads and where the TCN district adjoins another Place Type or fully developed parcel. The PT is to have "significant perimeter and environmental buffers" and "The community is to be surrounded by extensive wooded buffers maintaining the rural appearance of surrounding roads." and "Transition Small Lot Neighborhood projects should be surrounded by natural buffers that visually screen them from view of surrounding roads and from other developments."
#5798	2.03.03 Transition Compact Neighborhood – TCN
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/2/2021	It is hard to distinguish between TCN & TSN on the map provided.
#8990	2.03.03 Transition Compact Neighborhood – TCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/9/2022	acknowledged

ID	Section
#5714	2.03.03 Transition Compact Neighborhood – TCN
By: Maura Walsh-Copeland Tags: zoc 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?
#5784	2.03.03 Transition Compact Neighborhood – TCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 11/2/2021	Noted. Staff will take this under consideration.
#9050	2.03.03 Transition Compact Neighborhood – TCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 3/14/2022	Requiring contiguous open space should be addressed in the open space development standards. Also, the 2019 GP policies do not indicate that require contiguous open space should be achieved through regulation.
#6037	2.03.02 Transition Small Lot Neighborhood – TSN
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date: 11/14/2021	2.03.02.L Transition Small Lot Neighborhood – TSN. Pedestrian and Bicycle Network. Again, Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#8941	2.03.02 Transition Small Lot Neighborhood – TSN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date: 3/7/2022	Moved to Ped/Bike Networks Development Standards. LPAT referenced.
#6036	2.03.02 Transition Small Lot Neighborhood – TSN
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date: 11/14/2021	2.03.02.I Transition Small Lot Neighborhood – TSN. Siting of the Open Space and Building Lots. How are requirements for open space being contiguous with neighboring open space lots going to be incorporated? (Per the 2019 General Plan NHR Policy 6 Strategy 6.2, especially Action A). Proper siting of open space has an equally important ability to protect resources than just relying upon Development Standards. Are the other elements of NHR Policy 6 going to be covered in Development Standards, or should some of them be required here to ensure protection of biodiversity?
#8942	2.03.02 Transition Small Lot Neighborhood – TSN

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/7/2022	Open space connectivity addressed in Open Space Development Standards.
#5873	2.03.02 Transition Small Lot Neighborhood – TSN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#8943	2.03.02 Transition Small Lot Neighborhood – TSN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/7/2022	Acknowledged.
#5870	2.03.02 Transition Small Lot Neighborhood – TSN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	I will abstain from commenting on TPA Small Lot 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.
#8944	2.03.02 Transition Small Lot Neighborhood – TSN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/7/2022	Acknowledged.
#5797	2.03.02 Transition Small Lot Neighborhood – TSN
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/2/2021	Perimeter setback for TSN may be too large. Consider context and consider reducing.
#9008	2.03.02 Transition Small Lot Neighborhood – TSN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/9/2022	Setback is based on Transition Small Lot Neighborhood Place Type PT intent of "significant perimeter and environmental buffers" and "The community is to be surrounded by extensive wooded buffers maintaining the rural appearance of surrounding roads." and "Transition Small Lot Neighborhood projects should be surrounded by natural buffers that visually screen them from view of surrounding roads and from other developments."

ID	Section
#5712	2.03.02 Transition Small Lot Neighborhood – TSN
By: Maura Walsh-Copeland Tags: zoc 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?
#5783	2.03.02 Transition Small Lot Neighborhood – TSN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take this under consideration.
#9049	2.03.02 Transition Small Lot Neighborhood – TSN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/14/2022	Requiring contiguous open space should be addressed in the open space development standards. Also, the 2019 GP policies do not indicate that require contiguous open space should be achieved through regulation.
#10853	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:7/9/2022	<p>"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?</p> <p>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?</p> <p>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?</p> <p>Staff response: Requiring contiguous open space should be addressed in the open space development standards. Also, the 2019 GP policies do not indicate that require contiguous open space should be achieved through regulation</p> <p>2022 Round 3 Input: On the contrary, TPA Policy I, Action G.iii. States the requirement to ""Ensure that open space within developments creates or enhances the following: iii A contiguous network of green spaces to supplement the natural and heritage resources connecting communities and natural resource areas""</p>
#6134	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:11/15/2021	Typo--denigration should be degradation. It's found in E.2.b.2 as well as 3.a noted previously.

ID	Section
#6133	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	E. Lot Standards 3. Number of Groups. a. Typo--denigration should be degradation
#6035	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.03.01.I Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan? It alludes to that being covered, but it isn't mentioned explicitly.
#8892	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/1/2022	Moved to 5.15 Development Standards. LPAT addressed.
#6034	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.03.01.F Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1. Siting of the Open Space and Building Lots. How are requirements for open space being contiguous with neighboring open space lots going to be incorporated? (Per the 2019 General Plan NHR Policy 6 Strategy 6.2, especially Action A). Proper siting of open space has an equally important ability to protect resources than just relying upon Development Standards. Are the other elements of NHR Policy 6 going to be covered in Development Standards, or should some of them be required here to ensure protection of biodiversity? (LWC)
#8893	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/1/2022	Open Space and Natural and Environmental Resource Development Standards, as well as overlay districts address contiguity and protection of resources.
#5872	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#8894	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/1/2022	acknowledged.
#5809	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:11/3/2021	I.Pedestrian and Bicycle Network 4.a Why start with "If" since it's later followed by ...All development plans must provide? Trail connections for LPAT would more likely be along streams than roads, so that should be mentioned as another connection point to consider.
#8895	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/1/2022	Moved to 5.15 in Development Standards. LPAT referenced.
#5796	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/2/2021	The map provided to us for the Transition Policy area does not clearly identify where these different districts go. For example is all of the Lower Sycolin and Middle Goose to be TLN-10?
#8896	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/1/2022	The zoning map in WebLOGIS shows the subdistricts. They will not change.
#5739	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:11/1/2021	I do not think figures and sketches should be included n 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: 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.

ID	Section
#5711	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Maura Walsh-Copeland Tags: zoc 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?
#5781	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take this under consideration.
#9048	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/14/2022	Requiring contiguous open space should be addressed in the open space development standards.
#5710	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Maura Walsh-Copeland Tags: zoc 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: staff kate.mcconnell@loudoun.gov Date:11/3/2021	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. 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.
#5709	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com	2.03.01 TRANSITION LARGE LOT. Purpose. Bullet #9 "Nieghborhood-3" misspelling.

ID	Section
Date:11/1/2021	
#5782	2.03.01 Transition Large Lot Neighborhood – TLN-10, TLN-3, TLN-1
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Revised. Thank you.
#6033	2.02.07 Suburban Mineral Extraction - SME
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.02.07.F Suburban Mineral Extraction - SME. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan? It alludes to that being covered, but it isn't mentioned explicitly.
#9056	2.02.07 Suburban Mineral Extraction - SME
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/14/2022	Moved Ped/Bike Network to Development Standards. LPAT is referenced.
#5713	2.02.07 Suburban Mineral Extraction - SME
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:11/1/2021	for all Mineral Extraction districts: -Open space min of 50% not appropriate/confusing for mineral extraction. oDoes 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 oDespite language in the comprehensive plan, we need to be encouraging efficient use of these sites, maximizing yield, if open space means 50% must remain un-disturbed, that is in conflict with how these sites should be treated.
#5779	2.02.07 Suburban Mineral Extraction - SME
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9057	2.02.07 Suburban Mineral Extraction - SME
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/14/2022	Open space requirement is 30% in SPA; 20% in JLMA. Only in the TPA, where open space is a principal part of the development pattern is the requirement 50%. Since it is critical to the development pattern and could be provided to screen use from the road, the requirement continues to apply. Other comments should be addressed in open space standards.

ID	Section
#9746	2.02.06 Suburban Industrial – SI
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/22/2022	If data centers are allowed within SI, shouldn't they then also be permitted up to a 1.0 FAR and taller heights via SPEX to maximize the use of land designated for data centers?
#6082	2.02.06 Suburban Industrial – SI
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:11/15/2021	For sidewalks or shared use paths - it reads that they must be provided, but should there be guidance as to which one? Is that guidance covered by CTP, FSM, or elsewhere?
#9031	2.02.06 Suburban Industrial – SI
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/10/2022	Addressed in Bike/Ped development standards.
#6032	2.02.06 Suburban Industrial – SI
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.02.06.D Suburban Industrial – SI. Pedestrian and Bicycle Network. Again, Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#9234	2.02.06 Suburban Industrial – SI
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/24/2022	Bik/Ped network moved to development standards; however, the ZO implements the GP and the CTP. The ZO should include regulations that incentivize the LPAT.
#5708	2.02.06 Suburban Industrial – SI
By: Maura Walsh-Copeland Tags: zoc 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: staff kate.mcconnell@loudoun.gov	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

ID	Section
Date:11/3/2021	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)).
#6246	2.02.05 Suburban Employment – SE
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:11/17/2021	E. Road Network 1 & 2; This language is a challenge to enforce/review. "Blocks where feasible" - who is the judge on "feasible"?
#9490	2.02.05 Suburban Employment – SE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Addressed in Road Network development standards
#6245	2.02.05 Suburban Employment – SE
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:11/17/2021	Applicability Section - "Place Type": This precludes this district from any other place types then what is listed. While that is consistent with Comp Plan, this should not be in the ZO, it is Comp Plan language. Its precludes BOS ability to evaluate applications on case by case basis.
#9246	2.02.05 Suburban Employment – SE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/24/2022	The place types where this district is located are expansive and cover the location where the majority of employment uses in the SPA are located.
#6031	2.02.05 Suburban Employment – SE
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.02.05.F Suburban Employment – SE. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan? It alludes to that being covered, but it isn't mentioned explicitly.
#9247	2.02.05 Suburban Employment – SE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/24/2022	Bike/ped Network moved to Development Standards. Regardless, the ZO implements the GP and the CTP. The LPAT should be incentivized, but not required, in the Development Standards.

ID	Section
#5869	2.02.05 Suburban Employment – SE
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#9248	2.02.05 Suburban Employment – SE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/24/2022	acknowledged
#5795	2.02.05 Suburban Employment – SE
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/2/2021	Line 8 in the dimensional standards says 25' or greater if req. for fire protection. Since 25' is a minimum, any building code requirement that necessitates a greater separation need not be mentioned here. Suggest removing the unneeded language.
#9250	2.02.05 Suburban Employment – SE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/24/2022	Retaining to ensure the potential conflict is acknowledged and reduce potential for push back if the larger setback is required.
#5707	2.02.05 Suburban Employment – SE
By: Maura Walsh-Copeland Tags: zoc 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'?
#5815	2.02.05 Suburban Employment – SE
By: Kate McConnell Tags: 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.
#5801	2.02.04 Suburban Commercial – SC

ID	Section
By: John Merrithew Tags: zoc Date:11/3/2021	I suggest we go back to the use table and allow multi family, second floor residential as a use and include residential standards in the district.
#6074	2.02.04 Suburban Commercial – SC
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:11/14/2021	I agree with John here. I hate to see this district exclude residential. Shouldn't we want many of our commercial areas to trend toward mix use?
#9270	2.02.04 Suburban Commercial – SC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/28/2022	Residential is not consistent with the uses in the Place Type.
#6030	2.02.04 Suburban Commercial – SC
By: Maura Walsh-Copeland Tags: zoc mwalshcopeland@gmail.com Date:11/14/2021	2.02.04.G Suburban Commercial – SC. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan? It alludes to that being covered, but it isn't mentioned explicitly.
#9272	2.02.04 Suburban Commercial – SC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/28/2022	Ped/Bike Network moved to Development Standards and implement the 2019 GP and CTP.
#5974	2.02.04 Suburban Commercial – SC
By: John merrithew Tags: zoc Date:11/11/2021	The open space requirement of 20% seems steep for an individual lot.
#9271	2.02.04 Suburban Commercial – SC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/28/2022	Reduced to 5% to ensure not all open space is landscaped open space.
#5973	2.02.04 Suburban Commercial – SC

ID	Section
By: John Merrithew Tags: zoc Date:11/11/2021	Building Requirement-7-FAR: I don't understand the need for an FAR limitation if we have lot coverage and floor area limits. Won't the parking requirements and floor area limits serve to limit the FAR? I also don't understand the need for footnote #5, which seems to require a rezoning that limits the FAR to the district max. Are none of the existing commercial sites going to be zoned SC(NC)?
#9273	2.02.04 Suburban Commercial – SC
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/28/2022	I don't understand the question, but the FAR limitations are consistent with the current regulations. They allow an individual property to exceed the 1.0 FAR max (up to 2.0) provided the entire district is still limited to 1.0 FAR total. Also, max 1.0 total FAR is consistent with the Place Type.
#5972	2.02.04 Suburban Commercial – SC
By: John Merrithew Tags: zoc Date:11/11/2021	Yards-Adjacent to Roads (max)the difference between districts (30 ft and 40 ft seems insignificant. Suggest they be the same.
#5794	2.02.04 Suburban Commercial – SC
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/2/2021	I note that the yards adjacent to other nonres. districts is 35' in SC, but 15' in SE. Suggest making them the same--15'.
#5706	2.02.04 Suburban Commercial – SC
By: Maura Walsh-Copeland Tags: zoc 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: 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.
#14143	2.02.03 Suburban Mixed Use – SM
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org	Table 2.02.03.2 SM Adjusted Based Floor Area Ratio Under Building Techniques that Exceed Energy Efficiency Standards, clarify that this means the state code section 58.1-3221.2, which states that “an energy-efficient building is

ID	Section
Date:7/18/2022	any building that exceeds the energy efficiency standards prescribed in the Virginia Uniform Statewide Building Code by 30 percent."
#6266	2.02.03 Suburban Mixed Use – SM
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/19/2021	Regarding building height: with pedestal construction (concrete pedestal 1-3 stories and 5 stories of light framing above) now an increasingly popular and economic building form, we might want to better accommodate it by increasing the height limit to 80' or more.
#8534	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:2/14/2022	Height is based on Place Type - "up to 5 stories." We considered 1 story = 12 feet (also in GP), so a 5 story building would be 60 ft tall.
#6093	2.02.03 Suburban Mixed Use – SM
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	J.Publicly Accessible Gathering Spaces: 4.g.1 Open space greens and plazas should incorporate green infrastructure and appropriate urban stormwater bmps as a co-benefit of the public space and plantings (f) between the curb and sidewalks.
#6237	2.02.03 Suburban Mixed Use – SM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Table this until ZOC reviews Development Standards (Open Space) in January.
#9142	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/17/2022	This should be addressed in Development Standards. However, note that we can only incentivize LIDs as suggested considering current BOS direction, which is to meet minimum standards implemented by the state.
#6087	2.02.03 Suburban Mixed Use – SM
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	TABLE 2.02.03-4. MINIMUM SIZE REQUIREMENTS FOR PLAZA OR GREEN Same comment as before; major floodplain should be dedicated to county for linear parks and trails.
#6238	2.02.03 Suburban Mixed Use – SM

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff is contemplating if and how to incorporate natural resources and LPAT into this language.
#9141	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/17/2022	The plaza or green should be centrally located useable public gathering space. FOD would not be appropriate in this case.
#6086	2.02.03 Suburban Mixed Use – SM
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	H. Vertical Mix.3. Does this allow for drive-thru retail use in the mixed use center core? If so, doesn't seem appropriate.
#9143	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/17/2022	This requirement is based on the Design Characteristics of the Suburban Mixed Use Place Type.
#6085	2.02.03 Suburban Mixed Use – SM
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	TABLE 2.02.03-2. SM ADJUSTED BASE FLOOR AREA RATIO Interest in higher FARs likely only for residential, not commercial; are bonus densities for both? FAR and units/acre are apples and oranges--can you provide a way to cross-reference or understand how to understand density under FAR scenario?
#9144	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/17/2022	While FAR will regulate MF residential buildings, the applicant will also be required to commit a maximum number of dwelling units as part of a rezoning.
#6084	2.02.03 Suburban Mixed Use – SM
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	TABLE 2.02.03-1. SM DISTRICT DIMENSIONAL STANDARDS Open Space Requirements 17 2 thoughts: *Should indicate that major floodplains are to donated to the county fee simple for linear parklands and trails.

ID	Section
	*Building requirements should include LID/BMPs for stormwater management, i.e. green roofs/green walls, incorporation of green infrastructure.
#6242	2.02.03 Suburban Mixed Use – SM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/17/2021	Noted. Staff continues to consider if and how to address natural resource and LPAT language into the districts.
#9138	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/17/2022	Open space regulations address FOD. Will consider SWM/LID and green roofs/walls for FAR incentives.
#6083	2.02.03 Suburban Mixed Use – SM
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	2.02.03 Suburban Mixed Use – SM Purpose: For the bullet referencing location of office, multifamily buildings, and store entrances being along streets designed "primarily for pedestrians"...the reference to primarily for pedestrians is a conundrum. More clarity would be useful referencing a walkable streetscape or complete streets, but there has always been a vehicular component to a street in Loudoun. Does this mean that the county is encouraging some places within a development that have shrunken streets (in width) that would allow for limited vehicular access but the primary focus really is the pedestrian as in some European settings? That would be great! Under Specific objectives: The idea of really narrow streets that are clearly focused on the pedestrian would allow, per the bullet in this section, for enhanced open space plazas, greens and would constitute uniquely innovative design.
#6241	2.02.03 Suburban Mixed Use – SM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/17/2021	Noted. Staff continues to contemplate how to successfully implement the Comp Plan in terms of this place type.
#9140	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/17/2022	Brian Mabry - could you please take the comment above about narrower streets into consideration when working on the specific mixed use district regulations? We should have a discussion about this, as streets will either have to meet VDOT standards if public, or County standards if private.
#9275	2.02.03 Suburban Mixed Use – SM

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/28/2022	Sidewalk widths in Section 5.15 and open space requirements as more gathering/park space, as well as expressly allowing private streets in this district (rather than making it a modification request to not provide public roads that must meet VDOT standards) should address this.
#6029	2.02.03 Suburban Mixed Use – SM
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.02.03.M Suburban Mixed Use – SM. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan?
#9145	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/17/2022	The Zoning Ordinance implements the Comprehensive Plan (CTP and GP). However, the LPAT is referenced in the Open Space Standards.
#5977	2.02.03 Suburban Mixed Use – SM
By: John merrithew Tags: zoc Date:11/12/2021	This is one of those districts where I would hope we could minimize the standards and rely on a review process to evaluate proposals against the criteria in the Purpose section. This would allow some creativity on the part of the developer.
#9146	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/17/2022	The new PD District will allow a developer to make a proposal that differs from the regulations if desired.
#5975	2.02.03 Suburban Mixed Use – SM
By: John merrithew Tags: zoc Date:11/12/2021	Applicability, Size, and Location: since the core is the only mandatory district component, shouldn't the minimum district size be 10 acres (the minimum core size)? I also believe the district sizes are too large given the stature of development in the suburban policy area.
#5976	2.02.03 Suburban Mixed Use – SM
By: John merrithew Tags: zoc Date:11/12/2021	There seems to be a lot of reliance on or reference to approved concept plans. I don't recall the current ordinance referring to a CDP or rezoning to establish a standard. I would think the district stands on its own and not rely on a CDP. What happens in a situation where only a site plan is needed?

ID	Section
#9147	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/17/2022	I'm not sure I understand the concern, but I revised the 2.02.03C. to clarify that there are additional requirements when requesting a rezoning to SM. I agree that we do not need to state that in this case the development is controlled by a CDP when we don't say this in other districts and revised this section to remove this statement as well.
#5705	2.02.03 Suburban Mixed Use – SM
By: Maura Walsh-Copeland Tags: zoc 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?"
#5776	2.02.03 Suburban Mixed Use – SM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	There are not currently. Staff will take under consideration.
#9150	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/17/2022	No, because this is not necessarily a transit oriented development, so there would be nothing to base the radius on (no transit station). The fringe has be outside and adjacent to the core. The core has size limitations.
#5704	2.02.03 Suburban Mixed Use – SM
By: Maura Walsh-Copeland Tags: zoc 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: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted.
#5703	2.02.03 Suburban Mixed Use – SM

ID	Section
By: Maura Walsh-Copeland Tags: zoc 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?
#5778	2.02.03 Suburban Mixed Use – SM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9276	2.02.03 Suburban Mixed Use – SM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/28/2022	Deleted "live, work, play" purpose; retained high quality design, as this type of language has been in the ZO for many years. The purpose statement can be more subjective to show intent of regulations.
#6081	2.02.02 Suburban Compact Neighborhood – SCN
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	2.02.02 K. SCN Alternative Location Request. 4. Depiction of "how"...word is missing
#6240	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/17/2021	Corrected.
#6080	2.02.02 Suburban Compact Neighborhood – SCN
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	2.02.02 K. SCN Alternative Location Request. It's best for the county to designate the appropriate locations, and then the request show that the request is in the right location.
#6223	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.

ID	Section
#9130	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	The 2019 GP does not set up the application of the district this way. The project must meet the criteria.
#6079	2.02.02 Suburban Compact Neighborhood – SCN
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	2.02.02.J.8. SCN Alternative Location Criteria Can you be more specific as to other innovative design techniques besides just the perception of density being complementary to the surrounding built environment? Any images that you have would likely be helpful.
#6225	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider more specificity. We are currently listing everywhere that images and diagrams will be useful. we'll make sure this section is on the list.
#9129	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	Added to list
#6078	2.02.02 Suburban Compact Neighborhood – SCN
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	2.02.02.J. SCN Alternative Location Criteria The densities for SCN are within a wide range (particularly with affordable housing bonuses) that should be mapped and sites designated for the appropriate density within that range per county transportation plans and the other criteria on the list, particularly availability of and walkable distance to public facilities.
#6226	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9128	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov	The criteria have been adopted by the BOS as part of the Unmet Housing Needs Strategic Plan and are also part of the 2019 GP.

ID	Section
Date:3/16/2022	
#6077	2.02.02 Suburban Compact Neighborhood – SCN
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	2.02.02 Suburban Compact Neighborhood-SCN Purpose: Under bullet 2, am I correct in understanding that when applied to SN or SM Place Types, the SCN open space and height requirements are required?
#6228	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Yes, that is the intent.
#6076	2.02.02 Suburban Compact Neighborhood – SCN
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/15/2021	Purpose: Bullet #2--am I correct in understanding that when SCN is applied to SN or SM Place Types of the GP, the open space requirements for SCN and associated building heights apply?
#6229	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Yes, that is the intent.
#6073	2.02.02 Suburban Compact Neighborhood – SCN
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:11/14/2021	<p>I encourage the SCN alternative location criteria, however, there are far too many requirements. I would advocate that they might be able to apply SCN in SN if they provided housing as outlined in the Unmet Housing needs report (#1). Possibly, they could be required to meet some of the next several criteria, but not each.</p> <p>We will need SCN as infill housing and we should provide the flexibility to achieve it - or we will never achieve the goals of the Unmet Housing Needs Report.</p>
#6231	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.

ID	Section
#9127	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	These requirements have been adopted by the BOS as part of the Unmet Housing Needs Strategic Plan.
#6028	2.02.02 Suburban Compact Neighborhood – SCN
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.02.02.1 Suburban Compact Neighborhood – SCN. Pedestrian and Bicycle Network. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan? It alludes to that being covered, but it isn't mentioned explicitly.
#6233	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider if and how the LPAT will be addressed here.
#9126	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	This section is moved to Development Standards. Since these requirements are related to infrastructure, they do not specifically address the LPAT.
#6027	2.02.02 Suburban Compact Neighborhood – SCN
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.02.02.F.3 Suburban Compact Neighborhood – SCN. Siting of Open Space and Building Lots. What is the definition of "natural features"? Should this be aligned with, and explicitly mention, the preservation of natural resources listed in the 2019 General Plan NHR Policy 6 Strategy 6.2?
#6234	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff are considering how to best address natural features in the Urban and Suburban placetypes.
#9125	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: staff	Revised to environmental, natural, and heritage resources, which is defined.

ID	Section
kate.mcconnell@loudoun.gov Date:3/16/2022	
#6026	2.02.02 Suburban Compact Neighborhood – SCN
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.02.02.F Suburban Compact Neighborhood – SCN. Siting of Open Space and Building Lots. How are requirements for open space being contiguous with neighboring open space lots going to be incorporated? (Per the 2019 General Plan NHR Policy 6 Strategy 6.2, especially Action A)
#6235	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Tabling until ZOC reviews Development Standards in January.
#9124	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	This should be addressed in Open Space Standards.
#5868	2.02.02 Suburban Compact Neighborhood – SCN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	2.02.01 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 he judgment of ZOC members who know those areas and have stakes there.
#5750	2.02.02 Suburban Compact Neighborhood – SCN
By: Kevin Ruedisueli Tags: zoc 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.
#5769	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov	Noted. Staff will take under consideration.

ID	Section
Date:11/2/2021	
#9279	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/28/2022	Posing question to subcommittee.
#5749	2.02.02 Suburban Compact Neighborhood – SCN
By: Kevin Ruedisueli Tags: zoc 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?
#5813	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: 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. We are working with a consultant on yards so that missing middle unit types can be accommodated. Will address then. However, 3,000 unit maximum in a zoning district that anticipates a mix of unit types and between 16 du/acre is reasonable.
#5702	2.02.02 Suburban Compact Neighborhood – SCN
By: Maura Walsh-Copeland Tags: zoc 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?
#5770	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: 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.
#9132	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	The intent is that each criterion be met.
#5701	2.02.02 Suburban Compact Neighborhood – SCN

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/1/2021	"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."
#5772	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: 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.
#5700	2.02.02 Suburban Compact Neighborhood – SCN
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/1/2021	"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."
#5773	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: 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.
#5699	2.02.02 Suburban Compact Neighborhood – SCN
By: Maura Walsh-Copeland Tags: zoc 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

ID	Section
By: Ryan Reed Tags: 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: zoc 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: 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.
#5697	2.02.02 Suburban Compact Neighborhood – SCN
By: Maura Walsh-Copeland Tags: zoc 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?
#5775	2.02.02 Suburban Compact Neighborhood – SCN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9131	2.02.02 Suburban Compact Neighborhood – SCN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	The criteria are adopted as part of the 2019 GP and further clarified by the adoption of the Unmet Housing Needs Strategic Plan.
#6072	2.02.01 Suburban Neighborhood – SN

ID	Section
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:11/14/2021	I dislike garages that are the main feature of the house front, but I think requiring 10 feet set back is overly prescriptive
#6209	2.02.01 Suburban Neighborhood – SN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9096	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	In a zoning district where 4 to 6 dwelling units per acre are permitted, this requirement should be attainable.
#6071	2.02.01 Suburban Neighborhood – SN
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:11/14/2021	Where does the 25 acre maximum for infill project size come from?
#6221	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	2019 GP definition of Infill Development and Table 1. Infill and Redevelopment Terms and Concepts.
#6070	2.02.01 Suburban Neighborhood – SN
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:11/14/2021	For minimum lot sizes/widths, can we go smaller? Might this encourage smaller, affordable units? Small doesn't have to mean that it won't be nice.
#6222	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	In drafting district standards, we applied the ADU development standards, including lot width, that are less than the current requirements and intended to build in more affordability. There are no minimum lot sizes.
#6069	2.02.01 Suburban Neighborhood – SN

ID	Section
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:11/14/2021	Although dispersion of lot sizes can be visually appealing, it can also be limiting to a developer trying to provide affordable units. They can often be more cost effective to be built as a group.
#6224	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	Noted.
#9092	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	dispersion of lot sizes includes a provision to not disperse if the Zoning Administrator finds that the intent of this district and of the Zoning Ordinance will be better served by a design that tends to group lots of similar sizes.
#6025	2.02.01 Suburban Neighborhood – SN
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.02.01.J.3&4 Suburban Neighborhood – SN. Pedestrian and Bicycle Network. Again, Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan? It alludes to that being covered, but it isn't mentioned explicitly.
#6210	2.02.01 Suburban Neighborhood – SN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider if and how the LPAT language can be incorporated.
#9095	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	Moved to Development Standards. Also, this network is more about infrastructure and is separate from LPAT.
#6024	2.02.01 Suburban Neighborhood – SN
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.02.01.G Suburban Neighborhood – SN. Siting of Open Space and Building Lots. How are requirements for open space being contiguous with neighboring open space lots going to be incorporated? (Per the 2019 General Plan NHR Policy 6 Strategy 6.2, especially Action A) Are the other elements of NHR Policy 6 going to be covered in Development Standards, or should some of them be required here to ensure protection of biodiversity? Proper siting of open space

ID	Section
	has an equally important ability to protect resources than just relying upon Development Standards. (LWC)
#6211	2.02.01 Suburban Neighborhood – SN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Tabling this comment until ZOC reviews Development Standards (including Open Space) in January.
#9094	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	Comment should be addressed in open space standards.
#5985	2.02.01 Suburban Neighborhood – SN
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/12/2021	2.02.01 H Other lot requirements 1.a. Exception to the requirement for garages to be set back at least 10 feet behind the front line of the buildings. I'm having trouble picturing this scenario--if not on a street would the houses be fronting on a driveway or pipestem? But in any case, what's the rationale for allowing the garage to be closer than 10 ft behind the front line of the buildings?
#6212	2.02.01 Suburban Neighborhood – SN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9093	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	The lots could be arranged so that the architectural front is on a park or open space, but are accessed by an alley-like road. We would not want to require the garage to be setback from the front of these buildings, they should be at the alley.
#5984	2.02.01 Suburban Neighborhood – SN
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/12/2021	Table 2.02.01-2. Take another look at the footnotes on this. For Public/Civic uses there are two footnotes (#4 & #5), but at the bottom of the table those numbers are missing, there's only #1 and #2, with no reference to a #2 in the table.

ID	Section
#6213	2.02.01 Suburban Neighborhood – SN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Corrected.
#5867	2.02.01 Suburban Neighborhood – SN
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	2.02.01 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.
#5810	2.02.01 Suburban Neighborhood – SN
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/3/2021	F. Variation of Lot Sizes It's possible to have duplex, triplex and quadplex unit types that mimic the size and form of single family homes. Can different unit types be mixed in together on similar size lots?
#6227	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	Noted and yes - I included lot widths for a full building as well as individual footprints of a -plex unit so they could be provided as a condo or on their own lots. The widths or total -plex footprint widths are the same as or close to SFD lot widths.
#5802	2.02.01 Suburban Neighborhood – SN
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:11/3/2021	Does F.2 mean that no more than 60% of a development may be of any one of those types?
#6230	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	It means that the lot variation requirement only applies to those unit types. It would not make sense to have it apply to larger multifamily buildings or townhouses where all lots need to be similar and are typically small.
#5748	2.02.01 Suburban Neighborhood – SN
By: Kevin Ruedisueli Tags: zoc 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

ID	Section
	housing opportunities? If so, again, lots might need to be larger to accommodate them.
#5765	2.02.01 Suburban Neighborhood – SN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9100	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	The maximum lot size is nearly 1/4 acre. This should be able to accommodate detached garages. Also, there is no max lot size if each of the townhouses or -plex units are on their own lot.
#5747	2.02.01 Suburban Neighborhood – SN
By: Kevin Ruedisueli Tags: zoc 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.
#5766	2.02.01 Suburban Neighborhood – SN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9099	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	There are no minimum lot sizes and we limit the max to nearly 1/4 acre lots (10,000 sf). There should be opportunity to vary lot sizes by 500 square feet or more.
#5746	2.02.01 Suburban Neighborhood – SN
By: Kevin Ruedisueli Tags: zoc 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.
#5767	2.02.01 Suburban Neighborhood – SN

ID	Section
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9098	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	This is a minimum yard setback; they could increase the setback. The requirements to qualify for SN-6 include designing a development that compliments existing, which should cover this concern.
#5745	2.02.01 Suburban Neighborhood – SN
By: Kevin Ruedisueli Tags: zoc 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.
#5768	2.02.01 Suburban Neighborhood – SN
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9097	2.02.01 Suburban Neighborhood – SN
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:3/16/2022	This would allow nearly 1/4 acre lot for a quadruplex, triplex, or duplex. This should be attainable. Also, we are trying to ensure more affordability, which can be attained through smaller lot sizes. A larger lot size could result in very large - plex units, which is contrary to the intent of allowing them.
#5913	2.02 Suburban Policy Area Zoning Districts
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	I have an over reaching concern that we wont reach the goal of the new Suburban place types from the General Plan with the mass of goals that are now cited as restrictions. So many Ordinance musts will add up to a mass of restrictions than can never be created around. It's the cumulative effect, not specifically one individual item. The new place types want flexibility to flourish. But a mass of restrictions won't create the community the Plan envisioned.
#9673	2.02 Suburban Policy Area Zoning Districts
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/14/2022	In general, the zoning district regulations are similar to the existing district regulations. The goals in the Place Types are typically achieved through proffer commitments, which means they could also be met through a similar regulation. In addition, the PD district allows a proposal different than the base district

ID	Section
	regulations. Otherwise, this is a very general statement that is difficult to respond to. Please identify specific regulations that you feel cannot be attained.
#14020	2.01.02 Urban Employment – UE
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Add the same types of building orientation and street network text to the UE district to improve energy efficiency in building design.
#6022	2.01.02 Urban Employment – UE
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.01.02.J Urban Employment – UE. In addition to the pedestrian and bicycle facilities mentioned, shouldn't LPAT connections also be mentioned?
#6194	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider if and how to incorporate LPAT.
#6265	2.01.02 Urban Employment – UE
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/19/2021	Refer to Design Cabinet Charrette report on this gateway to see how trails can interconnect not only with the Broad Run north and south, but also how trails can connect to the west, enhancing pedestrian and bicycle circulation tying different districts together.
#9394	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/5/2022	Bike/Ped Network addresses infrastructure. LPAT should be incentivized in Open Space development standards.
#6023	2.01.02 Urban Employment – UE
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.01.02.J Urban Employment – UE. While tree canopy standards in Section 5.06 may not be applicable for the density in this place type, shouldn't there be standards for trees to reduce the heat island effect and general benefits of trees in urban areas? Places with high density and high amount of impervious surfaces would receive tremendous benefits from tree standards.

ID	Section
#6193	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider tree canopy standards appropriate for this place type.
#9403	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Since removed Inner/Outer core designation, the tree canopy exemption has been removed. A 10% requirement now applies to the entire district, as well as a street tree requirement.
#6021	2.01.02 Urban Employment – UE
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.01.02 Urban Employment – UE. Shouldn't this include specific language to include the Linear Parks and Trails Framework Plan? It alludes to that being covered, but it isn't mentioned explicitly. (LWC)
#6195	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider if and how to incorporate LPAT.
#9402	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Ped/Bike Network requirements, which have been moved to development standards, implement the GP and CTP policies and establish this infrastructure. LPAT should be incentivized in the Open Space standards.
#5983	2.01.02 Urban Employment – UE
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/12/2021	Is the expectation that the density will be higher in the UE area, requiring on-site amenities need to be provided at 25,000 square foot threshold versus the 50,000 or more sf of gross floor area threshold in the UT inner and outer core areas? Or perhaps there's another reason?
#6196	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Yes, the intent is to have higher density in UE.

ID	Section
#5982	2.01.02 Urban Employment – UE
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/12/2021	20.01.02 Same question as for the UT area onsite amenities question. Per the footnote under this section the amenities can be used to satisfy not just as civic but also park and open space requirements which seems odd for lockers, showers, changing rooms and restrooms.
#6197	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider if this was the intent.
#9404	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Revised to limit which amenities could be used to satisfy the open space requirement (which should also have a public/civic component).
#5981	2.01.02 Urban Employment – UE
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:11/12/2021	20.1.02 K. On-site amenities. Is the expectation that the density will be higher in the UE area, so the on-site amenities need to be provided at 25,000 square footages versus the 50,000 or more sf of gross floor area in the UT inner and outer core areas?
#6198	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	yes
#5919	2.01.02 Urban Employment – UE
By: John Merrithew Tags: zoc Date:11/6/2021	I agree with Kevin and others that the Broad Run iOS a defining feature in ther UE policy area. The whole area is roughly 500 acres and it looks like 25% down the middle is Broad Run. The bulk of the area is under conditional rezonings as well so large minimum district sizes and large road setbacks seem counter productive. I also think a structured grid pattern does. Not reflect the nature of the area and would be environmentally damaging, contrary to plan policy.

ID	Section
#6199	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take this under consideration.
#9409	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	ID'd floodplain in the Purpose statement. Road setback is only required along the Greenway, all others are exempt if they are in the UE district. Road network requirements (apply to the block pattern) allow the block to be broken/more linear development form is obstacles do not allow it's completion . The floodplain would be an obstacle.
#5912	2.01.02 Urban Employment – UE
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	J.3 Are the width's stated enough for a walkable community? J.3 & J.4 lane dimensions should be in the FSM, not ZO.
#6219	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	Noted. We will revisit widths for all mixed use districts and ensure they are adequate and appropriate and/or consistent. Bike path/trail lane widths will likely be in FSM, just need to coordinate and ensure they are covered somewhere and adequate.
#9396	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Revised and placed in Ped/Bike Network Development Standard Section 5.09.03. These widths are wider than FSM requirements, so they will be retained in the ZO unless or until the FSM is updated to required these widths..
#5911	2.01.02 Urban Employment – UE
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	G.4 & 5 Please verify that a true urban area can be viable and vibrant with the maximum block lengths. They seem short from Urban areas I've walked. I think the maximums should be increased for added flexibility and scale as compared to what seem more like a small suburban center.
#6220	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	Noted. Please note that block lengths are consistent with lengths in corresponding Place Types. Also, block lengths in Leesburg are 200 feet, so 800 foot blocks are substantially longer.

ID	Section
#5908	2.01.02 Urban Employment – UE
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	In A.2 why do we have a minimum district size that is non modifiable? Encouraging the use of the district that falls within the planning area shouldn't be limited because of smaller parcel ownership.
#6217	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	Noted. The district size is from the current zoning ordinance and represents that area needed to establish a full mixed-use district or TOD.
#9397	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Reduced since the Place Type does not anticipate a mix of uses, just compact development pattern. Still needs to be large enough to start this development pattern.
#5866	2.01.02 Urban Employment – UE
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#5865	2.01.02 Urban Employment – UE
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	Open space #12 and #13. Are these areas the same, can they overlap or must a developer do both? Needs clarification.
#6201	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	There is overlap, here is the definitions: Landscaped Open Space: An area which shall include appropriate grassing of the area, placement of shrubbery and trees, walkways, and appropriate grading such as to render the required open space area aesthetically pleasing. Open Space: Areas of trees, shrubs, lawns, grass, pathways and other natural and man-made amenities not within individual building lots, (except in rural village and Countryside Village developments), set aside for the use and enjoyment of residents, visitors and other persons, unoccupied by buildings or facilities unless related to recreational activities and in the TR and JLMA districts HOA facilities, and accessible to and adequate for persons and functions it is designed to serve. Lot coverage in the open space shall be limited to 0.01 of the lot. Generally, open space is intended to provide light and air and is designed for

ID	Section
	<p>either scenic or recreational purposes. For the purpose of this Ordinance, open space shall include and be qualified as active recreation space, common open space, and dedicated open space. a. Open space, active recreation: That open space that is designed for recreational purposes, to include, but not to, be limited to such uses as ballfields, multi-purpose courts, swimming pools, tennis courts, golf courses, play lots and playgrounds, camping, picnicking, boating, fishing, equestrian activities, walking and biking trails, and activities incidental and related to the foregoing. (In the TR and JLMA districts, these recreational facilities may include HOA facilities.) Recreational facilities may be open to the public for a fee, provided the intent of the open space requirements is maintained. Examples of acceptable for-fee facilities include golf courses and sports pavilions where such facilities are utilized and enjoyed by the development but that must secure outside users for economic viability. b. Open space, common: Land within, or related to, a development not individually owned or dedicated for public use which is designed or intended for the common use or enjoyment of the residents of the development and may include such complementary structures and improvements as are necessary and appropriate. In only the Planned Development Housing (PD-H) Zoning District, uses of common open space may also include a dog park provided that the following conditions are met: 1) the dog park is non-commercial in nature; and 2) the homeowners' association (HOA) for such PD-H Zoning District owns and operates the dog park and owns the common open space upon which the dog park is located. Such dog park may be open to the public for a fee, provided the intent of the open space requirements is maintained. c. Open space, dedicated: All open space which is to be dedicated or conveyed to the County or an appropriate public agency, board, or body for public use as open space. For the purposes of this definition, twenty-five percent (25%) of all dedicated school sites shall be considered as dedicated open space.</p>
#5864	2.01.02 Urban Employment – UE
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 11/4/2021</p>	<p>Lot and building standards #10. The table shows 100 SQUARE FEET as the maximum height of a building. That makes no sense.</p>
#6202	2.01.02 Urban Employment – UE
<p>By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date: 11/16/2021</p>	<p>The superscript 2 in the "Standard" column is a reference to footnote #2.</p>
#5863	2.01.02 Urban Employment – UE
<p>By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date: 11/4/2021</p>	<p>Objective - use a grid design. Why, oh why??</p>

ID	Section
#6203	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9400	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Consistent with Urban Employment Place Type. Also, this area is near a metro stop, so it should be walkable.
#5862	2.01.02 Urban Employment – UE
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#9401	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Virginia Code does not allow zoning ordinances to require strict building design regulations. However, the current and proposed data center Use Specific Standards include some regulations. And, this set of regulations require some pedestrian-oriented building placement and first floor use requirements. Otherwise, the ZO is not going to strongly regulate building design.
#5807	2.01.02 Urban Employment – UE
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/3/2021	Under K. Onsite amenities, it would be useful to include green walls and natural, green infrastructure features that serve a dual purpose of stormwater management and green space using native plants.
#6205	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9399	2.01.02 Urban Employment – UE

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Added reference to green roofs in J.2. Current BOS direction is to not require SWM facilities in excess of state requirements. Since this is a requirement for certain development types (and not an incentive), did not include SWM requirement. Since green walls are not a place for people to gather or use, did not include this.
#5806	2.01.02 Urban Employment – UE
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/3/2021	I agree with Kevin's comments regarding the Broad Run floodplain and making a specific reference to a linear park there as an objective. I believe this was discussed and agreed upon by the last board in an earlier iteration of the Urban Policy Area back during the Silver Line planning.
#9412	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Added reference in Purpose statement.
#5793	2.01.02 Urban Employment – UE
By: John Merrithew Tags: zoc Date:11/2/2021	UE District Line 4 - Disagree with the 100-foot setback from roads. Should be considerably smaller. Line 11 - don't understand the approach or the term occupied space in this context.
#9398	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	The 100 ft setback is only from arterial roads (Rt 267), otherwise the UE district is exempt from 5.07.02 Road Corridor Setbacks. Clarified occupied space requirement.
#5744	2.01.02 Urban Employment – UE
By: Kevin Ruedisueli Tags: zoc 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.
#5761	2.01.02 Urban Employment – UE
By: Ryan Reed	Noted. Staff will take under consideration.

ID	Section
Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	
#9414	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	added arrangement requirement.
#5743	2.01.02 Urban Employment – UE
By: Kevin Ruedisueli Tags: zoc 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.
#5762	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9413	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Subareas removed. No longer a focal point requirement.
#5742	2.01.02 Urban Employment – UE
By: Kevin Ruedisueli Tags: zoc 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.
#5763	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.

ID	Section
#9411	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Decreased to 20. We still want to be able to achieve a grid of streets. Smaller sizes would not result in this development pattern.
#5693	2.01.02 Urban Employment – UE
By: Kevin Ruedisueli Tags: zoc 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?
#5764	2.01.02 Urban Employment – UE
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9410	2.01.02 Urban Employment – UE
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Referenced
#14142	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	Table 2.01.01.2 UM Adjusted Based Floor Area Ratio Under Building Techniques that Exceed Energy Efficiency Standards, clarify that this means the state code section 58.1-3221.2, which states that “an energy-efficient building is any building that exceeds the energy efficiency standards prescribed in the Virginia Uniform Statewide Building Code by 30 percent.”
#14140	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	2.01.01 Purpose Statement Add the word "safe, well-lit" in this purpose statement: Provide for safe pedestrian and bicycle facilities that connect land uses and link with bicycle and pedestrian systems within and adjacent to the district.
#14003	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Gem Bingol/PEC	2.02.02.J. Building orientation

ID	Section
Tags: zoc gbingol@pecva.org Date:7/18/2022	Add a 3. Where feasible, building orientation should be north/south to improve energy efficiency.
#13999	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:7/18/2022	2.01.01.H.1. Add to the end of the sentence to promote north/south orientation of buildings and improve energy efficiency in design.
#13747	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/18/2022	2.01.01.K – Pedestrian Orientated Building Placement and Uses –Required percentages of walls, landscaping, fencing, and features along each lot in the UT/UM This section is entirely too prescriptive and confusing
#13746	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/18/2022	Open Space: - Define Gross land area? Not included in definition (floodplain excluded?) - Open Space in UT/UM needs to be calculated on ‘regional’ or policy area basis not per individual site plan • UT/UM developments will be developed under individual development plans (per block) and each site plan may not have 10% open space • The projects should (per County goals) include meaningful planned open space, that may not be subject of each and every site plan filed for development
#13745	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/18/2022	2.01.01.D – UM Sub Area Adjusted Base FAR – “An application for a Zoning Map Amendment, Zoning Concept Plan Amendment, or Special Exception approval in the UM Subarea is eligible for an increase from 1.5 FAR to 2.0 FAR by applying a combination of the Incentive Elements in Table 2.01.01-2. Total FAR increase cannot exceed 0.5.” -The county should not cap the potential FAR increase in these districts designated for urban development. Remove max increase cap of 0.5 FAR • The incentives focus on affordable housing, if a compelling project seeks additional FAR in UM district by providing
#13697	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/18/2022	Would incremental additional be allowed adjacent to PD-TC or PD-TRC districts that are already entitled? So much land in urban policy area is already zoned, need ability and flexibility to allow development and the language about min district size and additions may be problematic in reality

ID	Section
#13695	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/18/2022	Per ZO: "For the UM Subarea, be in areas consistent with the Urban Mixed Use Place Type of the General Plan" - The map only lists UM adjacent to Moorefield - The limit of UT Outer Core is 1/2 mile from metro - Urban land adjacent to Innovation Station Metro is predominantly outside 1/2 mile. - for all the land around Innovation station urban policy area outside 1/2 mile, the way this is written cannot be zoned. It can't be UT because its outside 1/2 mile and it can't be Um because that isn't shown on the General Plan
#13672	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc rbrittingham@dewberry.com Date:7/18/2022	Minimum district Size: The only un-entitled property in the Urban Policy area is the small unassembled parcels east of Waterside along Rock Hill Road. They are not 20 acres. This requirement precludes development of the only un entitled land in the Urban Policy area. Minimum district Size needs to be modifiable.
#10506	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: russ forno Tags: zoc russ.forno@ofplaw.com Date:7/5/2022	Remove purpose statements from all zoning districts - these statements of intent belong in the comp plan and are not enforceable.
#9877	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/25/2022	vertical integration remains very challenging to finance and to implement. this requirement will really limit viability of mixed use projects
#9876	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: William Junda Tags: zoc bjunda@gordon.us.com Date:4/25/2022	min building heights of 50'-95' doesn't allow for some component of human scale development (i.e. adding a 1-story Apple Store into a mixed-use project). Varying heights and the ability to provide nominal % of shorter buildings will allow for market flexibility and to provide interesting structures/uses.
#9713	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/19/2022	In general this is far too prescriptive. An example is K.2., which should be deleted...as can much of this section.

ID	Section
#9712	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/19/2022	Let the market decide the mix of elements. For example, requiring that least 40% be nonresidential is silly in today's market, where there is minimal demand for office space. In fact, the UT would be great if it were entirely residential with some retail.
#9711	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/19/2022	Like the bonus concept, but will anyone know what 8 & 9 mean?
#9710	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/19/2022	Max building heights of 95 and 70 feet will produce boring 5 - 8 story buildings that will have little visual impact. Suggest no minimum for Inner Core, though the FAA and MWAA may impose some limits.
#9709	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/19/2022	"Encouraging high quality design" is a great aspiration, but how exactly does the ZO do that?
#9708	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charlie Houston Tags: zoc CharlesHouston3@yahoo.com Date:4/19/2022	Why should we want grid patterns for streets in the UPA? That pattern can be boring.
#6019	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.01.01.L Urban Transit Center and Urban Mixed Use – UT/UM. In addition to the pedestrian and bicycle facilities mentioned, shouldn't LPAT connections also be mentioned? (LWC)
#6163	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff	Noted. Staff will consider if and how to incorporate LPAT.

ID	Section
ryan.reed@loudoun.gov Date:11/16/2021	
#6264	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kevin Ruedisueli Tags: zoc kevinruedisueliZOC@gmail.com Date:11/19/2021	LPAT could certainly be noted among the objectives.
#9425	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	addressed in open space standards
#9426	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	should be addressed in open space standards
#6020	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.01.01.N Urban Transit Center and Urban Mixed Use – UT/UM. While tree canopy standards in Section 5.06 may not be applicable for the density in this place type, shouldn't there be standards for trees to reduce the heat island effect and general benefits of trees in urban areas? Places with high density and high amount of impervious surfaces would receive tremendous benefits from tree standards. (LWC)
#6162	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider tree canopy standards appropriate for this place type.
#9466	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	This only applies to the 1st 1/4 mile around the metro station. Street trees and parks are required.
#6018	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM

ID	Section
By: Maura Walsh-Copeland Tags: zoc Maura@Walsh-CopelandConsulting.com Date:11/14/2021	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM. Regarding: "Provide for pedestrian and bicycle facilities that connect land uses and link with bicycle and pedestrian systems within and adjacent to the district;" Shouldn't this include specific language to include the Linear Parks and Trails (LPAT) Framework Plan? It alludes to that being covered, but it isn't mentioned explicitly. (LWC)
#6164	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider if and how to incorporate LPAT framework language.
#9465	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Please see Open Space Standards - LPAT should be addressed there.
#5980	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Gem Bingol Tags: zoc gbingol@pecva.org Date:11/12/2021	2.01.01 M. Under the list of types of on-site amenities #6 & #8 are reasonable and positive amenities, but the footnote under this section states that the on-site amenities may be used to satisfy the minimum parks, civic, and open space requirements for the Inner and Outer Core subareas. Should these be used to satisfy parks or open space requirements?
#6165	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider if this was the intention.
#9463	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Revised to indicate what can fulfill open space requirements.
#5979	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Gem Bingol Tags: zoc gbingol@pecva.org	2.01.01 A.1.d. This item is vague and intent could be clearer regarding the arrangement. Is it referencing type of land uses or mix that is safe?

ID	Section
Date:11/12/2021	
#6166	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider clarifying revised text.
#5907	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	L.3 Are the width's stated enough for a walkable mixed community? L.3 & L.4 lane dimensions should be in the FSM, not ZO.
#6215	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	Widths are moved to Ped/Bike Network Development Standards and are wider than required widths in FSM, so retained here. Shared use path requirements are consistent with the CTP.
#5906	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	1.5 If building heights are to be transitioned, they should be looked at as far as compatibility to the planning areas involved, not existing other communities. The new Urban areas must be allowed to meet their maximum potential per the General Plan's ultimate vision of the area, and an existing use shouldn't create extreme height limitations.
#6167	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will consider revised text to best implement the General Plan.
#9460	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	The text is moved to Transition Standards and represents the language of the plan policies.
#5905	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM

ID	Section
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	I.4 Please verify that a true urban area can be viable and vibrant with these maximum block lengths. They seem short from Urban areas I've walked. I think the maximums should be increased for added flexibility and scale as compared to what seem more like a small suburban center.
#6216	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	Block lengths are consistent with lengths in corresponding Place Types. Also, block length in Leesburg is 200 feet and recommended block length for successful pedestrian and vehicular movement is 250 feet. I think we are in the range.
#5903	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	The ranges in table 2.01.01-3 don't seem to work. For example in UT Inner Core with 15% Public & Open Space, a 40% Non Res Min yields only a 45% Res portion. Residential is probably needed in the 50% - 60% range to be viable. Residential is the key component of all of these mixed districts. The lower end of Non Res needs to be lowered to accommodate the needed Res portion. This applies to all three areas of UT and UM.
#6168	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9456	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Open Space is gross land area, not square footage. The mix is consistent with the Urban Transit Center and Urban Mixed Use Place Types.
#5901	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	Table 2.01.01-3 Can Public/Civic meet the Open Space requirement? Parks = Open Space ?
#6169	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	It depends. We'll keep this comment open for follow-up after Development Standards (which includes Open Space) is reviewed by ZOC.

ID	Section
#9459	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Yes, they can meet the open space requirement.
#5898	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	In E. I find the incentives for housing being tied to FAR difficult to administer and measure the success of meeting housing needs. As logical as it may be intended, increased floor are does not always increase number of units. We need units. Increased units properly sized to fill our demand should be incentivized.
#6170	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9454	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	The UHNUs will have to be similar in size to other units provided (by bedroom count). If they want to provide smaller units they can. The number of units proposed is also be required to be provided on a CDP.
#5896	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	I suggest A.4 be moved under A. to be more the Goals of the UT/UM district, and not all listed as a "must".
#6171	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9452	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov	Agreed (if I have the right section), and moved.

ID	Section
Date:4/6/2022	
#5895	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	In A.2 why do we have a minimum district size that is non modifiable? Encouraging the use of the district that falls within the planning area shouldn't be limited because of smaller parcel ownership.
#6218	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:11/16/2021	The district size is from the current zoning ordinance. The size represents that area needed to establish a full mixed-use district or TOD. At this point, the districts have been established and new rezonings would be incremental additions to the established districts.
#5861	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#6172	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take the addition of sculptures and the reduction of the overall list under consideration.
#9449	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Added sculpture; limited amenities that can count toward open space or public/civic use.
#5860	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	2.01.1 -L.5. Tunnels over a certain length should be lighted.
#6173	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov	Noted. Staff will take under consideration.

ID	Section
Date:11/16/2021	
#9448	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Revised in Ped/Bike Network Development Standards.
#5859	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	2.01.01-5 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”?
#6174	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9447	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Moved to Transition Standards where it is further described.
#5858	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	H Public gathering spaces. Does al fresco dining count? (It should.)
#6175	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9445	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM

ID	Section
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	A scenario could be created where a restaurant has seating on a plaza. This would count. But, if the dining is on a sidewalk, then it would not count. The space has to be useable by all, not just the patrons of a restaurant or shop.
#5857	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	H Public gathering spaces. Where are the development standards, esp. as to size?
#6177	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Chapter 5, Development Standards, scheduled for ZOC review in January.
#5856	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	2.01.01-3 G Vertical mix: What in the world are you trying to do? Let the market decide.
#9446	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Community Planning is supportive of minimums. Letting the market decide has not resulted in mixed use buildings.
#5855	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#9444	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	The use mix is consistent with the UT Place Type of the General Plan.

ID	Section
#5854	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#9443	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	This would only be if there is a change in use, not a change in tenant occupancy.
#5853	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	FAR bonuses don't seem worth much except in Urban Mixed-Use.
#6181	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff - link to #5898.
#9442	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	FAR bonuses are only permitted in the Urban Mixed Use Subarea.
#5852	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#9441	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Should be addressed in ADU requirements (Section 8.01).

ID	Section
#5851	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	#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.
#9439	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	How to measure building height is addressed in Section 5.01
#5850	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	#12 Maximum height around the Gateway Metro needs to be coordinated with the FAA for potential conflicts with Dulles air traffic.
#6184	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	The superscript 5 references #5 in the footnotes of the table which is existing language. Additionally, MWAA will be a referral on the draft when it goes public.
#5849	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#6185	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9438	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell	2.0 FAR is the minimum. There is no maximum.

ID	Section
Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	
#5848	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#6186	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9437	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	LPAT is addressed in the Open Space development standards.
#5847	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	Why suggest a grid pattern for streets? Let developers and their engineers decide. Grids can be monotonous. This ain't New York.
#9436	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	The requirement is consistent with the Urban Transit and Urban Mixed Use Place Types of the General Plan.
#5846	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.

ID	Section
#9435	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	This district is a revision of PD-TRC, which already exists near the Ashburn Station. The UT and UM Place Types envision what it will look like. Applicants may decide to provide public art. The FSM prescribes street tree species and would not allow only one type to ensure they are not decimated by disease.
#5845	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	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.
#9434	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	This district revises PD-TRC, which is already is applied around the Ashburn Station.
#5730	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc 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.
#5755	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: 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: zoc rbrittingham@dewberry.com Date:11/3/2021	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 Section 7.08.x, the minimum district size is not modifiable." hinders any ability to apply these regulations to smaller unassembled parcels
#5834	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff	Thank you, we will continue to discuss internally

ID	Section
ryan.reed@loudoun.gov Date:11/3/2021	
#9467	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Understood, but also need to ensure grid of streets is established.
#5808	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Gem Bingol/PEC Tags: zoc gbingol@pecva.org Date:11/3/2021	On-site amenities should also include green walls and encourage the use of green infrastructure style best management practices that also serve to manage stormwater.
#6190	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9432	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	Included green roofs. Did not include green walls because these are not places people can gather or amenities that people can use.
#5792	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: John Merrithew Tags: zoc Date:11/2/2021	Adjusted FAR table I think line 7 should refer to 2.01-01-1 Line 10 - if a developer provides 1/2 mile of LPAT trail do they get any FAR bump? Line 11 - the only PCRA in the Urban policy area is in Oak Grove. Seems to make this incentive unlikely to be used.
#6191	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9433	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov	Line 7 – revised Line 10 - revised to 0.025 per 1/2 mile, but you must provide a mile minimum unless there is less than that available on your property

ID	Section
Date:4/6/2022	Line 11 - will revisit upon development of redevelopment standards (by consultant).
#5790	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: John Merrithew Tags: zoc Date:11/2/2021	<p>UT/UM district comments:</p> <p>Lines 4&5 - disagree with 100 feet. We can't afford that much land be open in the urban area unless it is open space. Line 5 sounds like the setback is zero unless it is a plaza. I'm ok with that approach but I suspect the setback is 25 feet and it must be a plaza or dining area. The wording is not clear.</p> <p>Line 11 - says max lot coverage but the columns say no minimum.</p> <p>Line 12 - suggest no maximum for the UM. We are solving a problem we don't have (and thanks for measuring height in feet).</p> <p>Lines 14&15 - how and should this apply to individual buildings on a single lot? Do landscaped setbacks , plazas, and yards count as open space in the urban area? We may want some flexibility in what constitutes open space, particularly for the small property development.</p>
#6192	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff will take under consideration.
#9431	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	<p>Line 4 - only arterial road (greenway) has a setback. all others are exempt pursuant to Section 5.07.02</p> <p>Line 5 - the maximum setback is 10 ft. If you provide a plaza, etc. it is 25 ft.</p> <p>Line 11 - fixed. Thanks.</p> <p>Line 12 - maxi height is consistent with the place type - also needs to transition to suburban development pattern</p> <p>Line 14 - Open Space development standards identify how to provide. Line 15 - deleted.</p>
#5741	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc 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
#5751	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/1/2021	Noted. Staff will take this under consideration.

ID	Section
#5738	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc 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.
#5752	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/1/2021	Noted. Staff will revisit and take this under consideration.
#9474	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	This is a development standard and is implemented as enabled by the state code.
#5737	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc 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?)
#5753	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/1/2021	Noted. Staff will discuss and take under consideration.
#9476	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	I don't see any limitation except that each building must provide the 2 required amenities. I think the patio or plaza could be doubled if this is what you are asking.
#5736	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Rich Brittingham Tags: zoc RTBritt13@yahoo.com Date:11/1/2021	Min. FAR requirements needs to allow for phased development in which first phase falls below min. FAR

ID	Section
#5754	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9472	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	As I interpret this, the minimum FAR is for the subarea. The CDP requirements in 7.09.06 require minimum and maximum FAR. However, if development is not meeting the minimum FAR from the initial development proposal, then it would not be meeting the intent of the Place Type and would likely be setting up a scenario where it makes it harder for other developers to achieve the minimum.
#5696	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Maura Walsh-Copeland Tags: zoc 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.
#5695	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Maura Walsh-Copeland Tags: zoc 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?
#5757	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will take under consideration.
#9468	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	The minimum heights are consistent with the UT and UM Place Types in the GP.
#5694	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM

ID	Section
By: Maura Walsh-Copeland Tags: zoc 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: 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: zoc 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?
#5758	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	Noted. Staff will revisit to clarify.
#9477	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	I'm unsure of issue, but added a note that total square footage should = 100% of approved square footage. Hopefully this addresses the question.
#5691	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kevin Ruedisueli Tags: zoc 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.
#5759	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Ryan Reed	Noted. Staff will take under consideration.

ID	Section
Tags: staff ryan.reed@loudoun.gov Date:11/2/2021	
#9475	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/6/2022	If you do not have an area big enough to establish the street grid, then there is no way that this could be achieved.
#5690	2.01.01 Urban Transit Center and Urban Mixed Use – UT/UM
By: Kevin Ruedisueli Tags: zoc 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: staff ryan.reed@loudoun.gov Date:11/2/2021	Revised, but to be reviewed.
#5897	2.01 Urban Policy Area Zoning Districts
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	With so many pages of restrictions, will we really be achieving Urban?
#6160	2.01 Urban Policy Area Zoning Districts
By: Ryan Reed Tags: staff ryan.reed@loudoun.gov Date:11/16/2021	Noted. Staff continues to consider the best approach.
#9674	2.01 Urban Policy Area Zoning Districts
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/14/2022	In general, these zoning district regulations are similar to the existing district regulations. The UE regulations are less regulatory that the PD-TREC district. The goals in the Place Types are typically achieved through proffer commitments, which means they could also be met through a similar regulation. In addition, the PD district allows a proposal different than the base district regulations. Otherwise, this is a very general statement that is difficult to respond to. Please identify specific regulations that you feel cannot be attained.

ID	Section
#5844	2.01 Urban Policy Area Zoning Districts
By: Charles Houston Tags: zoc CharlesHouston3@yahoo.com Date:11/4/2021	Overall this is complex and shows disregard of market forces. While I comment below, this section really needs deep attention by a subcommittee.
#9676	2.01 Urban Policy Area Zoning Districts
By: Kate McConnell Tags: staff kate.mcconnell@loudoun.gov Date:4/14/2022	In general, these zoning district regulations are similar to the existing district regulations. The UE regulations are less regulatory that the PD-TREC district. The goals in the Place Types are typically achieved through proffer commitments, which means they could also be met through a similar regulation. In addition, the PD district allows a proposal different than the base district regulations. Otherwise, this is a very general statement that is difficult to respond to. Please identify specific regulations that you feel cannot be attained.
#5894	Chapter 2: Zoning Districts
By: Joe Paciulli Tags: zoc joepaciullizoc@gmail.com Date:11/5/2021	I have over reaching questions on the implementation of all new districts. How will they be implemented, what happens to all of the old district requirements, will differences be non conformities, will there be a remapping. I wonder after we complete our current review scheduled through February if we could get an update from the County Attorney in March on number of new ordinances, Rt. 28, implementation, etc.
#6159	Chapter 2: Zoning Districts
#5791	Chapter 2: Zoning Districts
By: Jean Ault Tags: zoc jean.ault@gmail.com Date:11/2/2021	Taking a quick look at old and new districts - there were appx 41 old zoning districts and now there are appx 53. I am concerned that this makes the ordinance MORE complicated, not less and reduces the flexibility we are looking for. I did read that we are still considering combining districts, and I hope that we do so.
#9707	1.01 Title, Purpose, and Intent
By: Charlie Houston Tags: zoc CharlesHosuton3@yahoo.com Date:4/19/2022	I STRONGLY advise adding a section C, to read something like this: "At the beginning of the sections of this Ordinance, italicized text is for guidance only and shall not control."