



# Save Rural Loudoun

www.saveruralloudounNOW.org

July 15, 2018

Supervisor Tony Buffington  
Loudoun County Board of Supervisors  
PO Box 7000, Mailstop #01  
Leesburg, Virginia 20177-7000

Dear Supervisor Buffington:

Following up on our meeting in your office on May 3, Save Rural Loudoun (SRL) is pleased to submit the following comments on the draft 2020-2040 Loudoun County Comprehensive Plan. We provide additional, detailed comments and recommendations in the attachment.

SRL welcomes the draft's many general statements of intent to preserve Loudoun's rural areas. For example, we strongly support the wording of Policy 2, which states that the County will:

“Limit residential development to protect the land resource for agricultural operations, rural economy uses, and open space uses; minimize traffic impacts; and reduce the demand for additional public facilities and services.” (p. 2-79)

Unfortunately, the strategies and actions proposed in the current draft are not sufficient to achieve this policy goal.

The County projects that, under existing zoning regulations, 7,500 new “by right” residential units would be built in the Rural Policy Area (RPA) by 2040 (p. 2-76). This would likely double the residential densities in the north and northwest parts of the County.<sup>1</sup> Rather than “limiting residential development” to preserve rural spaces, the draft Plan would result in the transformation of the north and northwest parts of the County from predominantly rural to predominantly suburban landscapes.

To avoid this unfortunate outcome, SRL recommends the following modifications of the draft Plan.

## Remove Policy Ambiguity:

In a number of places, the current draft suggests that the County's commitment to rural preservation is “flexible.” This policy ambiguity should be eliminated to ensure that Policy 2, as drafted, remains paramount.

SRL is particularly concerned with the proposed County-wide “Place Types” that would allow certain commercial and industrial developments that currently are not permitted in the RPA. In addition, we strongly object to the suggestion that these “Place Types” could be used to re-draw the County's zoning districts, potentially

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<sup>1</sup> Since the bulk of the AR-2 zoning district is already protected by permanent conservation easements, most of the projected 7,500 new residences would be built in the AR-1 zoning district.

erasing the current boundaries of the RPA (item 3 on p. 2-7). This has the potential to completely subvert the County’s stated rural policy goals.

#### Transform Policy Intentions into Concrete Actions:

For many proposed rural policies and strategies, the current draft fails to include specific, concrete actions needed to transform intentions into reality. In the following sections, we highlight key areas in which more concrete commitments are needed.

#### Increase Support for Loudoun Farms:

The actions proposed in the draft Plan are not enough to achieve the County’s goal of expanding the rural economy and attracting rural entrepreneurs (Strategy 3.3, p. 2-81). In particular, the draft does not recognize the importance of preserving a vibrant farming economy, which is an indispensable foundation for expanding agri-tourism and other non-traditional rural businesses.

SRL strongly recommends that the draft Plan identify specific new actions the County will take to support “traditional” farming. Those actions should include: (1) eliminating County taxes on barns, sheds and other structures used in the production of traditional crops; (2) partnering with the private sector to establish local agricultural processing, handling and packaging services; and (3) expanding financial support for agricultural vocational and technical training in the County.

#### Provide Material Support for Permanent Conservation Easements:

Given the number of “by right” residences that could potentially be built in the RPA under the current Zoning Ordinance, the willingness of landowners to put their lands under permanent conservation easement is critical. Unfortunately, many landowners are deterred by the significant up-front administrative and regulatory costs.

SRL strongly supports Action 1.1.B in the draft Plan (2-79), calling for the use of County funds to support new conservation easements. The text should be strengthened to provide for a small grants program that will leverage resources available from the State and private trusts to help defray landowners’ up-front costs.

In addition, we recommend that the County fund a feasibility study for establishing a Transfer of Development Rights (TDR) program. The intensive development projected for the County’s Urban Policy Area provides a tremendous opportunity for a successful TDR program, such as the one that has preserved thousands of acres of farmland in Montgomery County, Maryland.

#### Establish Strict Design Standards for Rural Residential Subdivisions:

According to the County’s website, over 80 residential subdivisions are currently being constructed in the RPA. Many of them have been built on scenic ridge lines and hill tops or along Loudoun’s scenic byways, significantly altering the rural landscape.

For this reason, SRL strongly supports Action 2.1.A in the draft Plan, calling for new subdivision regulations and design standards that “preserve the rural character, work with the land form to preserve and protect natural features, and conserve land for agriculture, rural economy uses, passive recreation and open space” (p. 2-79).

Ensuring the proper enforcement of new regulations is of critical importance. Therefore, SRL also strongly recommends that the Comprehensive Plan include a

commitment to provide public notice and opportunity to comment on all new applications to establish subdivisions of more than five units in the RPA.

**Limit the Size of Rural Residential Subdivisions:**

All of the actions proposed above may still not be sufficient to achieve the County's goal of limiting residential development in the RPA. Therefore, SRL proposes that the Plan include a specific action commitment, under Policy 2, to reduce the maximum lot yield for subdivisions in the AR-1 zoning district from one lot per five acres to one lot per ten acres.

After you and your staff have had time to review our comments and recommendations, we would appreciate the opportunity to meet with you again to discuss these issues and respond to any questions you may have. You may reach me at 240-731-6395 or at [johngriffinellis@gmail.com](mailto:johngriffinellis@gmail.com).

SRL is a non-partisan 501(c)(4) corporation representing citizens throughout the County who are interested in preserving Loudoun's rural countryside and farming economy. You may find further information about us on our Facebook page (Save Rural Loudoun) and our website ([saveruralloudounNOW.com](http://saveruralloudounNOW.com)).

Sincerely,



John G. Ellis

President, Save Rural Loudoun

Attachment: SRL's line-by-line comments on the draft Comprehensive Plan