

Town of Lovettsville

August 31, 2018

John E. Merrithew, AICP
Planning Manager
Loudoun County, Virginia
1 Harrison St. SE
Leesburg, VA 20177

Dear Mr. Merrithew:

The Town of Lovettsville would like to thank the Loudoun County Department of Planning and Zoning for the opportunity to comment on the *"DRAFT Loudoun 2040 Comprehensive Plan"*, dated May 7, 2018. We commend the County for undertaking this planning exercise to ensure sustainable, long-term growth which preserves the culture and community of our diverse region.

The Lovettsville Town Council directed the Town Planning Director and Zoning Administrator to coordinate a review of the draft plan by our Planning Commission for the Towns and JLMAs, Rural Policy Area, and Transitional Policy Area. Their review and detailed analysis was presented to the Lovettsville Town Council on August 16, 2018 and is attached to this letter.

Planning and development trends in the eastern end of the County have effects which ripple throughout rural Western Loudoun and the incorporated towns therein. These potential effects are considered in the analysis attached to this letter concerning the Town and JMLAs, Rural Policy Area, and Transition Policy Area sections of Chapter 2 (Land Use) of the Draft Loudoun County Comprehensive Plan.

We feel it is important for the Comprehensive Plan to include more details on the zoning, transportation and land use policies adopted by Lovettsville to ensure Towns and the County are working in concert to achieve shared goals. The current draft Comprehensive Plan provides only limited information on the work our Town has undertaken and we believe it would be invaluable to the County's long-term planning in our area.

Changes to the Rural Policy Area may further erode the town-county edge, undermining efforts to maintain and preserve open spaces in the western regions of the County. The Town remains committed to preserving a clear demarcation of the Town borders and supports efforts to limit development growth while protecting the rights of property owners. Initiatives such as Transfer of Development Rights programs may be useful to achieve these goals and are supported by the Town.

Continued infill of the Transition Policy Area (TPA) may lead to further pressure on farther West regions. The Town opposes shifting the boundaries of the TPA, and instead recommends a measured approach to the current policy areas to help preserve the open space and rural economy which is the foundation of our area.

The German Settlement

The Draft Envision Loudoun 2040 Comprehensive Plan is a great start to beginning the dialog on sustainable growth. The Town of Lovettsville believes that several key modifications should be made as the County Planning Commission and the Board of Supervisors considers the next steps. We appreciate the opportunity to provide feedback with the attached analyses and look forward to further engagement as we work together to ensure a strong future for the County and our Town.

Sincerely,

A handwritten signature in blue ink, appearing to read 'N. O. Fontaine', written in a cursive style.

Nathaniel O. Fontaine, Mayor
Town of Lovettsville



Planning Commission Report

Draft Loudoun County Comprehensive Plan ("Envision Loudoun 2040")
August 15, 2018

INTRODUCTION:

On July 5, 2018, the Town of Lovettsville Planning Commission was tasked by the Mayor and Town Council with reviewing and reporting on the Land Use Element (Chapter 2) of the Draft Loudoun County Comprehensive Plan ("Envision Loudoun 2040"), specifically the *Towns and JLMAs*, *Rural Policy Area*, and *Transition Policy Area* sections. The Town Planning Director, Joshua A. Bateman, AICP, presented a memorandum for discussion to the Planning Commission on July 18, 2018 to obtain broad direction from the Commission regarding the contents of the report to the Town Council. This report reflects the outcome of that discussion and provides a generalized, but comprehensive, evaluation of the Draft Comprehensive Plan's future land use recommendations that have implications for future land use planning in, and in the vicinity of, the Town of Lovettsville, the third-largest of Loudoun County's seven incorporated towns.

1. Towns and JLMAs:

Although the Commission appreciates the opportunity given to Town staff early in 2018 to provide feedback regarding the "Trends and Influences" statement for Lovettsville appearing on Page 2-93 of the draft plan, the resulting statement is too brief and lacks the detail and nuance contained in the input provided by the Town Planning Director to the County Planning Department. The resulting statement is a single, six-sentence paragraph that fails to adequately address the community's interests with respect to the growth that is affecting the Town and wider Lovettsville community. Furthermore, projects and initiatives involving shared interests and the need for continued cooperation between the Town and Loudoun County are likewise not sufficiently discussed in the draft. The consolidation of the myriad Town and JLMA policies in the Revised General Plan into a single overarching policy designed to apply to all of the incorporated towns in Western Loudoun fails to consider the degree to which each of these communities is unique in terms of their geographic context within, and relationship to, Loudoun County in the face of ever-increasing pressures exerted by suburbanization and the western expansion of development.

The Planning Commission welcomes the opportunity for recommending additional significant and specific edits to this section of the plan in order to incorporate the following observations, comments and positions:

- a) The Town has identified several limited areas outside of its corporate limits that may be candidates for annexation for the purposes of supporting existing and developing future

civic, commercial or employment uses and achieving the Town’s economic development goals, which aim to create a vibrant, small-town economy that, in turn, will contribute to a strong rural economy in the northern Loudoun Valley. Future annexation of these areas will be considered on a case-by-case basis and is dependent on the capacity of Town water and wastewater services to accommodate the future development of these properties, something that the Town is currently evaluating through its Water and Sewer Master Plan. These areas are in addition to several limited areas lying outside of its corporate limits that may be candidates for expanding Town water and sewer facilities and/or future annexations for the purposes of developing County government facilities providing vital services to the Lovettsville community (e.g. a new fire and rescue station, new middle and/or high school, etc.). The Town has no desire or intention of annexing land outside of the corporate limits for residential development, except to possibly facilitate re-subdivision of the section of the Kingsridge Subdivision lying outside of town limits at the northwestern tip of the Town.

- b) With respect to cooperation between the Town and County on improvements to the local transportation network, the Town seeks continued coordination and participation by Lovettsville citizens in the planning and implementation of needed improvements to the transportation network used by Lovettsville-area commuters to reach regional employment destinations, including improvements to the intersection of Virginia Route 287 and Virginia Route 9 in Wheatland, which currently experiences a Level of Service (LOS) of “F” during peak hours when most Lovettsville commuters are traveling through this congested intersection.
- c) The discussion of the Town’s progress towards build-out should note the significant land use changes which have occurred within the Town since the Revised General Plan was adopted, most notably the evolution of the Lovettsville Town Center from its initial concepts to a nearly-completed, neo-traditional community centered on a pedestrian-friendly and centrally-located business district having wide sidewalks, decorative streetlamps, and ample public gathering spaces. This trend, coupled with the development of residential subdivisions on remaining infill properties, redevelopment of properties in the “Old Town” for modern commercial uses, and implementation of streetscape projects on historic streets throughout town has transformed Lovettsville from a settlement of 853 in the year 2000 to a bustling, small-town of approximately 2,300 residents by 2018. Several large properties within the Town limits are available for future development, although land available for future residential development is much more limited compared to eighteen years ago.
- d) The policies apply to the towns as a whole, but more town-specific strategies and actions are needed for the Town of Lovettsville with respect to the following initiatives:
 - i. Coordination between the Town and County is critical for the provision and expansion of County government facilities serving the growing population of the northern Loudoun Valley. This includes the provision of Town water and sewer services, as capacity allows, to planned County facilities such as the Lovettsville

Community Center, Lovettsville Community Park, Lovettsville Volunteer Fire and Rescue Station, Lovettsville Elementary School, a new middle and/or high school, and other facilities which are or may be planned in the Lovettsville area.

- ii. Continued coordination between the Town and County in terms of transportation planning is critical. Potential connector roads crossing properties lying outside of town may be necessary for the planned future development of the Engle Tract and Lennar Tract to afford multiple points of connection to and from public streets. In addition, the Town seeks continued County funding for streetscape enhancements (e.g. the \$150,000 awarded in FY 2018 for East Broad Way Phase 2A Streetscape Improvements) and for pedestrian safety improvements and traffic calming on Town streets in the vicinity of the Lovettsville Volunteer Fire and Rescue Station, Lovettsville Elementary School, Lovettsville Community Center, and Lovettsville Community Park.

2. Rural Policy Area:

The County expressed its intentions early in the Envision Loudoun planning process to preserve the status quo in the Rural Policy Area (RPA) by keeping the policies essentially the same as in the Revised General Plan. While consolidation of policies is evident in the new plan, the County appears, for the most part, to have kept its word by not instituting significant changes to the plan’s direction for the RPA or Rural North.

The Planning Commission’s concerns regarding the Rural Policy Area stem mostly from its desire for the County to preserve the hard, town-country rural “edge” that exists at the corporate limits of the Town of Lovettsville. The continued subdivision of larger, agricultural-use properties into smaller, single-family residential lots in the vicinity of Lovettsville poses a threat to this hard “edge.” Examples include the Dutchman’s Creek Subdivision on Irish Corner Road and Waterford View Estates on Milltown Road; these large-lot, suburban-style residential subdivisions are located about a mile outside of town to the west and east, respectively. The plan states that “the County’s current growth management approach, which is being carried forward with this plan, has been successful in limiting residential growth,” but the information about residential development in the Rural Policy Area section states that the “build out” analysis for the RPA “results in the potential for up to 11,643 residential units under current policy and entitlements.” Even accounting for the presence of floodplains, conservation easements, mountain sides and steep slopes, the plan notes that “forecasted development from 2016 to 2040 in the RPA is 7,500 residential units based on current trends and the base density allowed by current zoning.” The Commission is concerned about the potential for significant additional future residential units in our corner of the Rural North allowed under the by-right (AR-1) zoning as well as the implications for preserving the hard “edge” between the Town of Lovettsville and the surrounding countryside.

The Planning Commission offers the following observations, comments and positions regarding this section of the draft plan:

- a) The Commission supports statements and policies aimed at maximizing the preservation of open spaces and lands dedicated to agricultural or forestry (i.e. rural) uses, particularly the proposed Purchase of Development Rights (PDR) program and efforts to establish both public and private conservation easements for this purpose. Establishing a Transfer of Development Rights (TDR) program in Western Loudoun should also be explored by the County in connection with towns in Loudoun that may be willing to consider higher-density development on the outskirts of their respective jurisdictions. The Town remains committed to preserving its “edge” and recognizes that these tools are essential to maintaining Lovettsville as the heart and commercial center of the larger agricultural settlement in which it is situated. The County’s appropriation of public funds for open space preservation during future budget cycles will demonstrate the extent to which the County is committed to the goal of preserving farmland and open space in Western Loudoun and the Rural North specifically.

- b) The Commission recognizes that the development of a healthy, rural economy is essential to slowing the conversion of farmland into residential subdivisions. To this end, the Commission supports statements, policies, strategies and actions aimed at nurturing agricultural and rural business uses in the Rural North. Many of the businesses situated outside of town limits in the northern Loudoun Valley participate extensively in the life of the Town and are nominally considered part of the wider Lovettsville community. The Commission supports reasonable zoning restrictions on such uses to mitigate effects associated with noise and traffic congestion and ensure that rural economy businesses are compatible with the desired character of this area and the quiet enjoyment of residential property.

3. Transition Policy Area:

Although located farther from the Transition Policy Area (TPA) than towns such as Middleburg and Purcellville, the Commission shares the concerns expressed by other towns about the encroachment of suburban-style development into the rural, western area of Loudoun County. The operative word to describe this area is “transitional” since properties located in the TPA are being rapidly converted into suburban subdivisions, particularly along the Route 50 corridor and to the north near Leesburg. Under current zoning, many of the larger remaining undeveloped and underdeveloped tracts in the TPA are likely to experience continued infill development during the next two decades such that, by 2040, the TPA will be indistinguishable from the Suburban Policy Area (SPA) immediately to the east. Provided the boundary of this area is not expanded westward to U.S. Route 15 (south of Leesburg) or beyond, the anticipated effects of this development on the Town of Lovettsville will likely be minimal given that the Town is located approximately 13 miles (as the crow flies) from the TPA at its northernmost point.

The Planning Commission offers the following observations, comments and positions regarding this section of the draft plan:

- a) The “Trends and Influences” notes that 6,200 acres remain available for development in the TPA, but does not indicate what the total number of residential units would be if this area, or a subset of this area omitting “challenging” land types (e.g. floodplains, steep slopes, etc.), were completely built out under the various by-right zoning classifications that exist throughout the area. The Commission believes that this information, like that provided for the RPA, should be included in this section so that citizens know how the TPA is trending with respect to the demand for residential units as well as the timeframe for build-out of the TPA during the next 20 years. This section should also indicate the number of undeveloped building lots that have been created but are awaiting home construction so that the complete inventory of future residential lots in the TPA is clearly communicated in the plan.
- b) The Commission opposes any western shift of the boundary of the TPA at this time as part of the Envision Loudoun planning process. The TPA appears to contain thousands of properties that either have already been subdivided according to the maximum density allowed under the by-right zoning or have otherwise been planned and zoned to allow further subdivision for higher-density residential development in the future (up to 4 dwelling units per acre in some locations). This “backlog” of undeveloped building lots should be sufficient to accommodate future residential growth in this area of the County without the need to expand the boundary of the TPA to the west or north as part of this plan revision.

CONCLUSION:

The Planning Commission concludes that the Draft Envision Loudoun 2040 Comprehensive Plan which emerged from the comprehensive planning process in July of 2018 needs considerable additional revisions consistent with the recommendations contained in this report before it is ready for endorsement by the Loudoun County Planning Commission or Board of Supervisors. The Commission believes that the observations, comments and positions articulated in this report provide sufficient supporting information to the Mayor and Town Council to present their concerns to the Loudoun County Planning Commission and Board of Supervisors on behalf of the citizens of the Town.

As always, the Planning Commission stands ready to assist the Mayor and Town Council throughout the plan adoption process in whatever capacity the Mayor and Council see fit. The Commission is thankful for the opportunity to comment on the Draft Envision Loudoun 2040 Comprehensive Plan.

This report is hereby adopted by the Town of Lovettsville Planning Commission in accordance with its duties as prescribed in §15.2-2221 of the Code of Virginia, and is presented to the Town Council as a report on the status of planning within the jurisdiction with respect to the Draft “Envision Loudoun 2040” Loudoun County Comprehensive Plan.

APPROVED:


Thomas Ciolkosz, Chairman


Date