

**Loudoun County School Board**  
**Academies of Loudoun Service Center**  
**CMPT-2022-0003, SPEX-2022-0038, & SPMI 2022-0006**  
**Response to January 30, 2023 Second Referral Comments**  
**March 2, 2023**

**Department of Planning and Zoning – Community Planning**

Comments Dated January 20, 2023

**Comment 1:** The proposed construction of the public utility service center with storage yard will require ground disturbing activities and the removal of a significant portion of the forest cover. Discussions with the Natural Resources Team (NRT) confirmed concerns about severing the continuous ecological corridor link by cutting this link off from the Goose Creek area and clearing of additional trees in excess of what was removed for the construction of the existing Academies of Loudoun facility.

**Response:** It is acknowledged that the construction of the proposed service center will require ground disturbing activities and removal of trees. This is true with any proposed development. The ecological corridor is not cutoff from the Goose Creek area. Rather, it is maintained through the setback along and preservation of the River and Stream Corridor coupled with significant tree preservation. This corridor ranges in width from 300 feet to 445 feet and is wider than the immediately adjacent corridor segment to the south which is situated between the proposed site and Goose Creek. There is no new disturbance proposed that would cut off the River and Stream Corridor. Significant areas of tree cover will remain (2,500,000 square feet or 57+ acres) on The Academies 119-acre property.

**Comment 2:** Community planning continues to find the proposed location not in conformance with the GP vision for the Transition Policy Area or the Transition Large Lot Neighborhood Place Type due to concerns over the adverse impact on natural and environmental resources. Staff recommends that the applicant consider an alternate location that has less of an impact upon the Reservoir Protection Area and forest cover or break the operation over multiple sites. Alternately, Staff recommends locating the proposed uses at the site identified by Staff in the above graphic (on the eastern portion of the site between Sycolin Road and The Academies of Loudoun). This is to reduce the potential impact on the site and ensure the “protection natural, environmental, and heritage resources” as per the GP policies.

**Response:** The Applicant respectfully submits that the measures incorporated into the project provide a balance between protecting natural resources and allowing development to occur in a responsible manner. The site is a very large property at 119 acres in size. The TR-10 zoning requires 70% of the site to remain in open space. The 2019 Plan policies provide that 50% of the site should remain in open space. With the proposed development, 80% open space will remain. Primary environmental features including the River and Stream Corridor as well as significant tree save will be protected. Comprehensive storm water management and site design specifically for the storage and handling of road materials have been incorporated into the project.

Staff has proposed the use be relocated to the front portion of the site. The area between Sycolin Road and The Academies of Loudoun is split by Loudoun Academy Drive, possesses steep slopes and topography that would require substantial grading. The northern portion of the site is also encumbered by an 80-foot in width gas easement containing multiple gas lines. There is a 4+ acre area (existing stockpile location) located on the south side of Loudoun Academy Drive that is feasible for development but not of sufficient size for the proposed use. There is also an approximate 2-acre area located to the south of The Academies

of Loudoun building which is likewise not of sufficient size. This area should also be maintained in the event The Academies of Loudoun is ever expanded in the future. Dividing the site into multiple locations would be counter to the purpose of consolidating the grounds maintenance facilities which allows for an efficient and more economical operation.

**Comment 3:** While the forested area preserved, compared to the minimum threshold per the Zoning Ordinance, is a valid argument to address the concerns raised by Staff regarding significant clearing of forest cover, the issue of concern that remains is the severed link of the ecological continuum with major, and repeated, disturbance to the same site.

**Response:** Please refer to the responses to Comments 1 and 2 above.

**Comment 4:** Community Planning Staff continues to have concerns about the extent of disruption and contamination to the site's natural environment and water resources from proposing an industrial type of facility in the Reservoir Protection Area. Staff recommends that the applicant relocate to a more suitable site for this type of facility or break up the facility operation over multiple sites. Another option would be moving the proposed uses to the location identified by Staff on the same site, as discussed earlier in this referral. This is to reduce the potential impact on the site and ensure the protection of its "natural, environmental, and heritage resources" as per the GP policies.

**Response:** Please refer to the responses to Comments 1 and 2 above.

**Comment 5:** As stated in the first referral, Community Planning Staff finds the proposed "public utility service center and storage yard" supportive to the existing LCPS and County facilities. However, Staff cannot support the request at this time due to the continued concerns regarding water quality controls and loss of forest cover.

**Response:** The Applicant agrees that the proposed use is consistent with the 2019 Plan policies to recognize and allow public use support facilities. Further, the project incorporates comprehensive stormwater management and facilities specifically designed for the safe storage and handling of road materials. As noted previously, significant forest cover will remain on the property.

**Comment 6:** Staff finds the purpose of proposing a public utility service center and storage yard, to provide necessary services and increase operational efficiency of public facilities during inclement weather, in conformance with the GP policies. However, Community Planning Staff remains of the opinion that the general location, character, and extent of the proposed facility is not in conformance with the land use policies of the 2019 GP and recommends that the applicant provide options to move the proposed use to a more suitable industrial location, break up the operation over multiple sites, or consider relocating the facility operations to the area identified by Staff southeast of the same property. This is to reduce the risk to the environmental features on the site and ensure water quality controls. While the Community Planning Staff finds the SPEX request to permit the proposed "Public utility service center and storage yard" in keeping with the supportive uses for existing County facilities, Staff does not support the request due to concerns over the impacts to the Reservoir Protection Area and additional loss of forest cover on the site.

**Response:** The Applicant offers that the proposed use is consistent with the 2019 Plan for the following reasons:

- The proposed public utility service center is a supporting public use that will meet the needs of both Loudoun County Public Schools and Loudoun County. The facility is planned to be a part of the County's emergency response plan.
- The River and Stream Resource area, ranging in width from 300-445 feet, is protected.
- Significant open space (80%) has been incorporated into the site planning.
- Significant forest area (2,500,000 square feet/57 acres) will be retained.
- Significant evergreen tree installation, along with strategic use and placement of structures, is proposed to provide year-round buffering and screening to ensure compatibility with the surrounding uses.
- Comprehensive stormwater management for water quality and quantity will be provided in compliance with County and State requirements.
- The proposed facility has been designed for safe handling and storage of road materials.
- The site is designed to minimize lighting and noise. A photometric plan for the proposed lighting has been provided which demonstrates the planned low lighting levels. The distance of the proposed facilities in relation to surrounding properties coupled with the placement of structures and existing and proposed buffering will reduce noise.
- The site is centrally located for the intended service use and has access to necessary development infrastructure (utilities, access). and
- The proposed use meets the 2019 Plan goals for co-location of public facilities and efficient utilization of resources.

All aspects of the proposed use will be addressed as a part of the site design and operation. The Applicant respectfully submits that the proposed use is in compliance with the 2019 Plan policies.

### **Goose Creek Scenic River Advisory Committee**

Comments Dated January 19, 2023

**Comment 1:** The GCSRAC commented that: The proposals by the School Board will introduce hazardous substances that are harmful to the health of the waters of the creek and surrounding vegetation. The Applicant's detailed response to us, and as mostly set out in the Responses to Department of Planning and Zoning-Community Planning ("Community Planning") are noted and appreciated. The systems proposed for containment of hazardous substances on the site for capture and removal (oil and salt) are extensive and detailed. If they work as expected, then perhaps contamination is not an issue. On the other hand it has to be considered that the systems may be overwhelmed, simply fail, or their efficacy not fully considered. The GCSRAC is convinced that the systems are approved for the intended use but is concerned that they are more appropriate for less sensitive sites where and failure or overload is not so threatening.

**Response:** The Applicant has designed the facility to protect the surrounding environmental resources and will operate the facility in the same manner. The GCSRAC's recognition of the careful planning and design is appreciated.

**Comment 2:** Further, removing and disturbing the existing natural resources of the site will erode the ecological vitality of the corridor; and Loss of Ecosystem Vital to Creek Corridor

**Response:** The Applicant acknowledges that there will be forest cover removal and ground disturbance as a part of the development but has taken special measure to protect the River and Stream Corridor and maintain significant tree cover on the property. The intent is to allow reasonable and responsible development while protecting and maintaining substantial environmental resources.

**Comment 3:** Despite the Applicant's proposals to maintain much of the natural vegetation, tree canopy, and specimen trees, the GCSRAC remains concerned about the effects on the creek through the natural drains emanating from the site if it is partially denuded for this type of development. Further, the loss remains irreplaceable. Along these lines the members of the GCSRAC have specific comments. Principal among these are the proposed replacement of 30" diameter trees with 1" trees. The suggestion is for larger trees that would grow faster.

**Response:** The Applicant understands this comment is related to the proposal to replace any healthy tree located within the Tree Conservation Area that is inadvertently damaged during construction. The text included on the plan is modeled from County staff recommendations for tree replacement and provides for two 1-inch caliper native, non-invasive deciduous trees. Generally, one-inch trees are utilized because, despite being smaller initially, have a greater survival rate and, ultimately, grow faster because they adapt to the planting more quickly. The evergreen trees to be planted for the Type C buffer around the perimeter of the facility will be 6-8 feet in height at planting.

**Comment 4:** How much "wiggle room" is permitted for limits of clearing.

**Response:** It is anticipated that the clearing limits will be less than depicted. Because the site is not fully engineered, the limits of grading depicted are larger to ensure substantial compliance at site plan stage.

**Comment 5:** The GCSRAC notes that Virginia native species would be the replacements as well compose all natural buffers. Red Cedars, White Spruce and Virginia Holly have been found by GCSRAC experience to be more successful than White Pines, Loblolly, and Eastern Hemlock.

**Response:** The Applicant is willing to use the tree species (Red Cedars, White Spruce, and Virginia Holly) recommended if these trees are available and County Staff concurs. These three species may need to be further supplemented with additional species to meet the County's diversity requirements. The requested species have been noted in the Legend on Sheet 5 and in Note 2 below the Canopy Computations on Sheet 6.

**Comment 6:** The GCSRAC joins in Community Planning Comment 3 and emphasizes that the loss of tree cover contributes to the degradation of water quality due to lack of natural filters for drainage from the site. Further, the proposed screening is not a substitute for loss of cover.

**Response:** The Applicant agrees that tree cover and vegetation are a natural filter for drainage. Where tree cover is to be removed for development, the proposed comprehensive stormwater management plan will utilize tested and approved stormwater management devices to ensure proper filtration and water quality. The proposed stormwater management plan will provide for both water quality and quantity in conformance with County and State regulations.

The proposed evergreen planting, coupled with strategic placement of structures, is intended to afford year-round screening for the facility.

**Comment 7:** Focusing on Natural Resources Comment 4, the GCSRAC is also concerned with degradation of the Ecological Core. The Applicant has provided specific responses about disturbances, but this committee remains concerned that disturbances are neither minimal nor minor. For long periods during the year, the Applicant will introduce heavy truck traffic and noise, as well as related activities, which will have an out-sized impact on the Ecological Core in relation to the relative footprint of the site. Put another way, a passive building such as storage for the school would be much less damaging to the Ecological Core.

**Response:** The heavier truck traffic is to occur during days of inclement weather. On average, this effort is mobilized ten days of the year. On a daily workday basis, the traffic is low with only 20 employees reporting to the site, 16 of which leave the property in pairs, traveling in 8 trucks, and 4 remaining on-site at the repair shop. The predominant use of the site is storage.

**Comment 8:** Further, it is not just the improvements to the site that would have a negative impact but also the introduction of hazardous activities to the surrounding area. At present the only such activity is the routine maintenance of the school and nearby roads. With the addition of operations on the site, the surrounding roads and general area would be burdened with the transport of materials which, if released by accident or inadvertence, would compromise the Ecological Core and the drainage into Goose Creek. A truck accident outside the site where none of the proposed controls exist is a concern to the GCSRAC. Without the development of this site, that risk virtually disappears.

**Response:** As noted by GCSRAC, the Applicant has incorporated measures into the proposed facility to protect the surrounding area. While no facility can be designed to be accident-proof, the potential for an accident is significantly reduced because the vehicles will be operated by licensed, trained drivers traveling at lower speeds during time periods that will have less cars on the roadways.

**Comment 9:** The GCSRAC maintains its concerns about locating these improvements in the Reservoir Overlay District. Natural Resources Comment 7 succinctly states the problem: Goose Creek is a DEQ-designated impaired water. It is in need of greater protection and not greater threat. Despite the Applicants detailed proposals to control contaminants on the site, the fact remains that there will be contaminants on the site and any failures in control could result in further impairment of Goose Creek and the reservoir.

**Response:** The Applicant understands the sensitivity of the environmental resources and has planned for proper control and management. The design of the facility including the comprehensive stormwater management program and the safe storage and handling of materials incorporates layers of safeguards.

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**Comment 10:** While the committee is cognizant of the reasoning to respond to growth in the county, the GCSRAC still finds that this site is still more convenient and desirable for the Applicant, rather and necessary and wise for the county. The reasons given for selection of the site: location, access, physical development suitability and size, and that it is already owned, are all descriptive of any desirable project. The Applicant states that 23 other sites were considered but rejected for a variety of factors. Absent from this response is any over-arching or urgent need for this facility (the county operates over 100 such facilities) and that it is so critical that it should be located in a sensitive overlay district and Ecological Core. The GCSRAC is aware that grounds and inclement weather operations are necessary, but in reading the responses it cannot find the great weight of necessity for such a facility on this site that tips the balance from safety and protection of the creek and the general surrounding environment. The heightened burden of justification does not appear to be met in the responses.

**Response:** The Applicant respects the GCSRAC and the vigilance with which the organization and its members advocate. With regard to the above comment, the Applicant respectfully disagrees. There is a critical need for the proposed facility in order to maintain the cited LCPS facilities as well as County of Loudoun owned facilities and the new facilities that will be constructed to serve the continued growth. After an extensive land search, the proposed site was identified. Moreover, the site characteristics were considered, and comprehensive design measures incorporated to protect the surrounding environment.

**Comment 11:** As stated above, introduction of intensive operations of this nature to the site extend risks beyond the site itself to the point of posing great risks to detrimental drainage into Goose Creek. The GCSRAC finds the responses regarding safety on the site admirable, but overall there is a failure to meet the high threshold for introducing an operation of this nature and magnitude into this sensitive area. These operations are more appropriate to less sensitive sites and their surroundings.

**Response:** Please refer to the response for Comment 10.

## **Department of Building and Development - Natural Resources Team**

Comments Dated January 20, 2023

**Comment 1:** Comments submitted with the first submission have been addressed, there are no further floodplain management comments at this time.

**Response:** Acknowledged

**Comment 2:** Please correct mathematical error in GFA outdoor storage tabulation. Total should be 72,080 SF, rather than 720,801 SF as stated on plan.

**Response:** Thank you. Corrected.

**Comment 3:** Repeat comment: Staff remains strongly concerned about fragmentation of this ecological core and respectfully disagrees with the applicant's response that the proposed development will result in minimal disturbance to this feature identified by the Department of Conservation and Recreation. Staff further notes that the ecological value of the floodplain is not the only consideration with regards to the General plan policy nor the DCR findings. Mature, healthy forests are critical to preserving habitat and

movement for wildlife. The proposed 60% increase to impervious area on the site is a major impact to the ecological value of the site and causes significant fragmentation to the existing wildlife corridor between Goose Creek and habitat areas to the west.

Advisory Comment: Staff notes the location of the proposed facility within an Ecological Core, as determined by the Department of Conservation and Recreation. The particular ecological core that is the subject of this determination offers significant habitat value as well as providing a significant migration and wildlife route within the Goose Creek watershed, as well as to Catoclin Mountain and rural areas to the west. Preservation of such wildlife corridors has been prioritized in General Plan Policy 6.2. Actions associated with this strategy include:

- a) Require development proposals to create links to adjacent open space and natural resources to help prevent habitat fragmentation and foster biodiversity.
- b) Identify essential wildlife corridors and encourage protection of these areas through conservation easements acquired by the County or others, participation in the Open Space Preservation Program, development design, and other means.
- c) Ensure that new development, redevelopment, and infill development incorporates existing native vegetation and plantings of native vegetation to protect pollinators, migrant birds, and other wildlife.

**Response:** The proposed site development maintains linkage to adjacent open space and natural resources. The on-site River and Stream Corridor is protected, ranges in width from 300 feet to 445 feet and connects to the 290 foot in width segment to the south which is situated between the proposed site and Goose Creek. Significant areas of tree cover will remain (2,500,000 square feet or 57+ acres) on The Academies 119-acre property. Existing vegetation/tree cover is incorporated and new tree plantings will utilize native species.

**Comment 4:** Staff remains concerned about impacts to existing mature forest and recommends selection of an alternative or redesign of proposed use to reduce impervious surface and impacts to existing forest.

The impact of the proposed project on existing vegetation is a matter of consideration as part of a special exception application (RZO 6-1309(4)). Consistent with Forest, Trees, and Vegetation Strategy 4.1 Action B of the 2019 General Plan and to minimize the impact of the proposed project on existing vegetation staff recommends preserving forest cover within the site. Staff recommends that Tree Conservation Areas (TCA) be added to the plat sheets.

- a) Staff strongly suggests reconsideration of the design to reduce habitat fragmentation and consolidate stormwater impacts outside of Reservoir Protection Area.

**Response:** After the proposed development, the 119-acre property 57 acres of forest will be maintained as will the environmental corridor that will continue to provide environmental habitat. Also reference the response to Comment 3 above.

**Comment 5:** Staff requests a calculation of the site's impervious surface area in its existing condition, compared with its proposed condition. Comment Addressed

**Response:** Acknowledged

**Comment 6:** Repeat Comment: Staff appreciates the additional detail provided with the second submission but remains concerned about the presence of the proposed use and associated loading and mixing activities in close proximity to sensitive natural resources including the forested wetlands on site as well as the broader reservoir protection area. Staff notes the close proximity of the proposed salt mixing area to existing forested wetlands, as delineated in the included Wetland Delineation Report, and notes the potential for ground and surface water contamination, as well as habitat degradation due to this proposed use.

**Response:** The Applicant appreciates the staff recognition of the comprehensive stormwater management plan and the design measures incorporated into the site development for protection of environmental resources including water quality and quantity.

**Comment 7:** Repeat Comment: Staff respectfully differs with the applicant's opinion that proposed use will not impact existing or future programming at the Academies of Loudoun. Proposed use will eliminate the highest quality forests on site, in which there are active and ongoing educational activities, attested to by Community planning as well as Natural Resources Team staff that are actively engaged in such programming on the site. Staff questions the impacts of the proposed use on existing or future programming at the Academies of Loudoun, existing mature forests and forested wetlands have potential for curriculum enhancement and environmental education opportunities that may be disrupted by proposed use.

**Response:** As noted previously, The Academies property is 119 acres in size. After the proposed development, 57 acres of forest will remain. Eighty (80) percent of the site will remain in open space. The River and Stream Corridor, ranging in size from 300-445 feet in width and approximately 8.8 acres in size is protected. These land areas will continue to be available for the Academies of Loudoun instructional activities. Stated differently, the developed area of the site with the proposed development will be 20%. The TR-10 District development performance standard is to maintain 70% open space which allows for the possibility of an additional 10% of the site to be developed. While there are no plans for further development, any future development would be submitted to the County for review.

**Comment 8:** Staff suggests the applicant commit to the following Conditional Approval regarding Tree Conservation Areas:

- a. Within the areas identified on the SPEX Plat sheet 5 as "Tree Conservation Area" the Owner shall preserve healthy trees provided, however, that trees may be removed to the extent necessary for the construction of trails, passive recreational amenities, and stormwater management facilities that are required pursuant to the Proffers and/or shown on the approved Construction Plans and Profiles as lying within such Tree Conservation Areas and for the construction of utilities necessary for the development of the Property. Notwithstanding the previous sentence, a minimum of 80% of the canopy within the cumulative Tree Conservation Areas depicted on the CDP will shall be preserved, exclusive of

stands of Virginia Pine over 25 years in age. In the event that the 80% canopy threshold cannot be achieved within the designated Tree Conservation Areas, such lost canopy will shall be recaptured elsewhere on-site in locations to be designated at the discretion of the Owner in consultation with the County. Boundaries of all Tree Conservation Areas shall be clearly marked in the field prior to land disturbing activities and shall be delineated on each site plan and record plat containing any portion of a Tree Conservation Area.

- b. If, during construction on the Property, it is determined by the Owner's certified arborist and/or the County Urban Forester that any healthy tree located within the boundaries of any of the Tree Conservation Areas described in this Conditional Approval has been damaged during construction and will shall not survive, then, prior to bond release on any section of the Property containing or immediately adjacent to such Tree Conservation Area, the Owner shall remove such tree and replace each such tree with two (2) 1-inch caliper native, non-invasive deciduous trees. The species of such replacement trees shall be determined by the Owner's certified arborist or landscape architect in consultation with the County Urban Forester or Zoning Administrator. The placement of the replacement trees shall be proximate to the area of each such damaged tree so removed, or in another area as requested by the County.
- c. POA documents shall include a provision that prohibits the cutting and/or removal of trees in the Tree Conservation Areas as shown on the site plan or record plat after construction has been completed by the Owner without specific permission of the County Urban Forester or Zoning Administrator except as necessary to accommodate tree hazard mitigation or forest management techniques, performed by or recommended by a professional forester or certified arborist, that are necessary to protect or enhance the viability and/or regeneration potential of the canopy. Such management techniques may include, without limitation, pruning and cutting of vines, invasive species, trees uprooted or damaged by extreme weather conditions, and trees or limbs that are diseased, insect-infested, dead, or are considered a hazard to life or property.

**Response:** The Applicant has depicted the tree areas on site that will remain after the proposed service center development (Tree Conservation Area). The Tree Conservation Area is not intended to preclude any future development that may be allowed in accord with the applicable regulations at that time. Any future site development would likewise identify tree areas that would remain and be subject to review and action by the County. Because the property is predominately in tree cover, the recommended language of retaining 80% of the tree cover has the effect of limiting future development. The Applicant has added notes to the Tree Preservation Plan to address the intent of the staff recommendation while maintaining the option for any future expansion that may be proposed. (There are no plans for future development beyond the requested service center at this time.)

**Comment 9:** Staff suggests the following Conditional Approval for Specimen Tree Preservation:

- a. The Owner shall engage a Certified Arborist to prepare a tree preservation plan for the specimen trees ("Specimen Trees") identified as Tree Number 1193 and 1195 shown on Sheet 5 of the SPEX Plat. For the purposes of this Conditional Approval, the Critical Root Zone ("CRZ") for these specimen trees shall be increased to one and half times the total diameter of the trees at

breast height. A tree preservation plan shall be provided to the County for review and approval prior to the approval of the first site plan, including any site plan amendments, for the Property. Such tree preservation plan shall identify the tree protection measures that shall be employed to protect the Specimen Trees during construction activities, which measures shall include, without limitation, providing for (i) placing of fencing outside the CRZ of such Specimen Trees if near the LOD, (ii) avoiding construction activities within such CRZ to the greatest extent possible, and (iii) requiring that construction plans for all permitted improvements on the Property shall clearly define the limits of the CRZ and that the limits of the CRZ shall be clearly marked in the field. If construction activities within the CRZ of the Specimen Trees are unavoidable or unintentional encroachments occur, then the Owner and/or their Certified Arborist will develop a remediation plan to be approved by the County Urban Forester and implemented thereafter. In addition, any utility line that must be located within the CRZ of the Specimen Trees shall be installed using a boring technique supervised by a Certified Arborist. In the event any one of the Specimen Trees are damaged during construction and in the opinion of a Certified Arborist and/or the County Urban Forester cannot be saved, the Owner shall replace the damaged Specimen Tree with four one-inch caliper native non-invasive deciduous trees. The placement of the replacement trees shall be proximate to the area of the damaged Specimen Tree so removed, or in another area as requested by the County Urban Forester or Zoning Administrator.

**Response:** A note has been added to Sheet 6 to provide the recommended Specimen Tree Preservation Plan. The language has been modified to reflect that it is on the actual SPEX Plan and to utilize the one foot per inch critical root zone standard as defined in the County Facilities Standards Manual (Section 7.303.B).

### **Department of Planning and Zoning – Zoning Administration**

Comments Dated January 18, 2023

**Comment 1:** Zoning Administration staff defers to the Community Planning division of the Department of Planning and Zoning to opine on whether the proposed modification (SPMI-2022-0006) and compliance with the policies of the Loudoun County 2019 Comprehensive Plan.

**Response:** Acknowledged

**Comment 2:** For the election district information in the title, please include both the 2011 and 2022 election districts as follows:

- 2011 Election District: Catoclin
- 2022 Election District: Little River

**Response:** The requested change has been incorporated.

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**Comments provided by the following agencies indicate no objection to the proposed school use and request no additional information:**

- Department of Planning and Zoning – Archaeology (Community Planning)
- The Fire Marshall’s Office
- Loudoun County Health Department
- Loudoun Water
- Parks Recreation and Community Services
- Virginia Department of Transportation