MEMORANDUM

To: Loudoun County Planning Commission
From: Pat Giglio, Planner III, Planning and Zoning
       Dan Galindo, AICP, Planning Manager, Planning and Zoning
Date: October 1, 2020
Re: October 8, 2020 Planning Commission Work Session
    CPAM-2020-0001, Public Facilities in the Rural Policy Area

PURPOSE
The purpose of the Comprehensive Plan Amendment (CPAM) is to amend the Loudoun County 2019 General Plan (2019 GP) to add text and policies to permit the extension of the central water and wastewater system to serve public facilities located on contiguous parcels in the Rural Policy Area (RPA) located immediately adjacent to the western boundary of the Transition Policy Area (TPA). The CPAM also amends the 2019 GP Existing Facilities Map to add a future middle school site as a feature shown on a potential County-owned public use property located along the eastern edge of the RPA where it adjoins the TPA. The potential future public middle school site is approximately 172.9 acres in size and is located on the west side of Evergreen Mills Road (Route 621), on the south side of Red Hill Road (Route 617), and southwest of Ryan Road (Route 772).

The CPAM will partially reconcile the 2019 GP’s treatment of municipal and central systems1 with regard to public sewer and water extensions into the RPA to serve public facilities and expedites the approval process for the potential future middle school which has a planned opening in the fall of 2024.

STAFF RECOMMENDATION
Staff supports a Planning Commission (Commission) recommendation of approval to the Board of Supervisors. Action on the application is time sensitive as the County’s study period on the future middle school site expires December 16, 2020 with a scheduled closing date in January 2021.

BACKGROUND
At the June 16, 2020, Board of Supervisors (Board) Business Meeting, the Board unanimously voted (9-0) to initiate the CPAM. The Board during its meeting affirmed the scope of the CPAM, which has two distinct components: 1) adding policy support for the extension of the central water and wastewater system to serve public facilities located on contiguous parcels in the RPA located immediately adjacent to the western boundary of the TPA, and 2) identifying a future middle school site as a feature shown

1 Municipal systems are operated by incorporated towns. The central system is operated by Loudoun Water.
on a potential County-owned public use property located along the eastern edge of
the RPA where it adjoins the TPA.

At the Commission’s public hearing on September 22, 2020, six members of the
public spoke on the application. Topics mentioned by the speakers included:
1. The continued inability of surrounding properties to connect to the central
utility system when the CPAM would allow the proposed school to connect and
a recommendation to move all properties in this area from the RPA to the TPA;
2. The potential traffic impacts, visual impacts, and impacts on environmental
and historic resources associated with development of a future middle school;
3. The potential for additional public schools or other public facilities to be co-
located on the site in the future; and
4. The geographic scope of the CPAM possibly allowing public facilities with
connections to central utilities along the RPA’s entire boundary with the TPA.

The Commission’s discussion of the CPAM covered many of the same topics as well
as:
1. Concern that the introduction of central water and wastewater connections in
the RPA, even to serve County-owned public facilities as contemplated in the
CPAM, would represent a historic change in County land use policies that
restrict central utilities in the RPA;
2. Process for consideration of other potential public facility uses in the RPA in
the future; and
3. Acknowledgement of the need for additional schools to serve existing and
projected student enrollment forecasted for the Dulles South Area and the
unique location of the potential future middle school site in close proximity to
existing population centers such as Brambleton and Willowsford.

The Commission voted unanimously to forward (8-1, Hayes opposed) the application
to a future Work Session for further discussion.

TOPICS FOR DISCUSSION
In response to requests and questions raised at the Planning Commission Public
Hearing, Staff has compiled the following summaries by topic. The summaries
provide additional background as a basis to facilitate the Commission’s discussion of
the CPAM.

Board of Supervisors Motion to Initiate CPAM-2020-0001
At the June 16, 2020, Board Business Meeting, the Board unanimously voted (9-0)
to initiate the CPAM. Although some Board members expressed concerns regarding
the introduction of central water and wastewater into the RPA, the Board ultimately
affirmed that the limited scope of the CPAM was appropriate. The Board considered
a motion to limit central utility service to only schools but concluded the language
would preclude other appropriate County-owned facilities from being established in
the area. The Board noted that each future public facility proposal in the area would
be reviewed on its own merits through the Commission Permit process (see additional
discussion below) and affirmed that the potential middle school site should be identified as a feature shown on the County’s existing facilities map (Attachment 1).

Legal Advertisement and CPAM Scope
In keeping with direction from the Board’s initiation of the CPAM, the legal ad advertising the Planning Commission Public Hearing for CPAM-2020-00001 was narrowly defined and only considers 1) policy text amendments to allow the extension of central water and wastewater to serve public facilities located on contiguous parcels within the RPA and immediately adjacent to the western boundary of the TPA and 2) revision to the existing facilities map to identify a future middle school as a feature shown on a property located along the eastern edge of the RPA where it adjoins the TPA.

The draft amendments (Attachment 2) presented in the Planning Commission Staff Report and the legal advertising for the Planning Commission Public Hearing on September 22, 2020 are limited in scope, in keeping with the direction provided by the Board’s initiation of the CPAM. The Board has tasked the Commission to review the CPAM within the limited scope; however, the Commission may take several courses of action on the CPAM. The Commission may recommend approval of the CPAM as presented, recommend approval of the CPAM with revisions, or recommend disapproval of the CPAM. However, as part of their deliberations, the Commission may make additional recommendations to the Board related to the content of this CPAM or the initiation of alternative planning initiatives.

Specifically, consideration of other planning initiatives such as redesignating existing portions of the RPA to the TPA as discussed during the Planning Commission Public Hearing would be outside of the scope of the current CPAM and the provision included in the legal advertisement. If the Commission believes the proposed middle school site and surrounding properties should be moved from RPA to TPA, it is within the Commission’s purview to include a recommendation to the Board to that effect. This recommendation should be separate and distinct from the recommendation on the land use issue before the Commission as described in CPAM-2020-0001.

Infrastructure and Development Overview for Proposed Middle School Site
In response to specific questions raised by the Commission at the September 22, 2020 Public Hearing, Loudoun County Public Schools (LCPS) has provided a letter dated September 28, 2020 with information on potential comparative development costs of onsite water and wastewater, traffic assessments, and potential uses on the potential County-owned public use property (Attachment 3).

Future Public Facilities


3 Moving the proposed middle school site and surrounding properties from the RPA to the TPA was contemplated in early drafts of the 2019 GP, but the Board ultimately decided this area would remain within the RPA in the adopted 2019 GP.
Although some public hearing speakers referenced a preliminary site plan from 2008 prepared for LCPS that depicted three schools on the property, the CPAM currently under Commission review would add only a single middle school site as a feature shown on the public facilities map within the 2019 GP. The addition of this middle school and its potential impacts should be the only considerations of the Commission when evaluating the CPAM. Any future school or other public facility proposed to be located on the middle school site (or any other site within the County) will require the submission and approval of a Commission Permit application under a separate legislative review unless the facility is already shown in the 2019 GP. The purpose of a Commission Permit is to determine whether a proposed facility’s location, character and extent comply with the adopted comprehensive plan.

Geographic Scope
As noted at the Public Hearing, the geographic scope of the policy change proposed by the CPAM would allow for the possibility of future public facilities connected to the central utility system along the entire length of the RPA’s boundary with the TPA. If the Commission determines that the geographic scope should be narrowed, the Commission can amend the draft policy language accordingly. Specifically, narrowing the applicability of the policy statement to the immediate area of the potential middle school site could take the form of a revised text amendment as highlighted below. Staff is also available to work with the Commission on language for other alternative geographic limitations if desired.

Actions
A. Prohibit extension of central water and wastewater service into the Rural Policy Area, except as allowed herein to address a public health threat to an existing rural community or to serve public facilities on contiguous parcels immediately adjacent to the western boundary of the Transition Policy Area Evergreen Mills Road and on the south side of Red Hill Road.

Draft Motions
As noted above, the Planning Commission may take several courses of action on the CPAM. In addition to the proposed motions below, the Commission may further move additional recommendations for the Board’s consideration.

Recommend Approval as Presented
I move that the Loudoun County Planning Commission adopt the proposed Resolution Recommending Approval of CPAM-2020-0001 included as Attachment 4 to the Department of Planning & Zoning Memorandum dated October 1, 2020.

Recommend Approval as Amended
I move that the Loudoun County Planning Commission adopt the proposed Resolution Recommending Approval of CPAM-2020-0001 included as Attachment 4 to the Department of Planning and Zoning Memorandum dated October 1, 2020, with the
following revisions:_________________. I further move that the Planning Commission direct staff to prepare a revised resolution consistent with this motion and authorize the Chairman to sign the resolution as revised.

Recommend Disapproval
I move that the Loudoun County Planning Commission adopt the proposed Resolution Recommending Denial of CPAM-2020-0001 included as Attachment 5 to the Department of Planning & Zoning Memorandum dated October 1, 2020.

ATTACHMENTS
1. Copy Teste, June 16, 2020, Board of Supervisors Business Meeting. *Initiation of CPAM-2020-0001 to Allow Certain Public Facilities in the Rural Policy Area to Connect to Central Water and Wastewater and to Identify the Sites of Future Schools (Blue Ridge/Catoctin)*
2. Draft Revisions to the Text and Policies of the *Loudoun County 2019 General Plan*
3. Loudoun County Public Schools Letter, date September 28, 2020
4. Resolution Recommending Approval of CPAM-2020-0001
5. Resolution Recommending Denial of CPAM-2020-0001
At a business meeting of the Board of Supervisors of Loudoun County, Virginia, held in the County Government Center, Board of Supervisors’ Meeting Room, 1 Harrison St., S.E., Leesburg, Virginia, on Tuesday, June 16, 2020 at 5:00 p.m.

IN RE: Initiation of CPAM-2020-0001 to Allow Certain Public Facilities in the Rural Policy Area to Connect to Central Water and Wastewater and to Identify the Sites of Future Schools (Blue Ridge/Catoctin)

Supervisor Buffington moved that the Board of Supervisors initiate CPAM-2020-0001 to allow public facilities on contiguous parcels in the Rural Policy Area located immediately adjacent to the western boundary of the Transition Policy Area to connect to central water and wastewater.

Supervisor Buffington further moved that connections to the extension of central water and wastewater into the Rural Policy Area be strictly limited to public facilities, and that no other use be permitted to connect to any portion of such authorized extensions of central water and wastewater into the Rural Policy Area.

Supervisor Buffington further moved that the Board of Supervisors approve the workplan for CPAM-2020-0001 as proposed in the June 16, 2020, Board of Supervisors Business Meeting Action Item.

Seconded by Chairman Randall.

Supervisor Buffington accepted Supervisor Turner’s Friendly Amendment to amend the first paragraph of the motion as follows:

Supervisor Buffington moved that the Board of Supervisors initiate CPAM-2020-0001 to allow public facilities on contiguous parcels in or planned in the Rural Policy Area located immediately adjacent to the western boundary of the Transition Policy Area to connect to central water and wastewater.

Voting on the Amended Motion: Supervisors Briskman, Buffington, Glass, Kershner, Letourneau, Randall, Saines, Turner, and Umstattd – Yes; None – No.
COPY TESTE:

[Signature]

DEPUTY CLERK TO THE LOUDOUN COUNTY
BOARD OF SUPERVISORS
Attachment 2

CPAM-2020-0001, Public Facilities in the Rural Policy Area

New proposed language for the Loudoun County 2019 General Plan is shown underlined in red below. Proposed existing language to be struck is shown in red strike-through. In addition, the Plan’s Existing Facilities Map (Map Number 2018-147) is also proposed to be revised as an Existing and Planned Facilities Map depicting the location of a future middle school site on the eastern edge of the RPA bordering the TPA within the area of the circle as shown on the map.

Chapter 6 - Fiscal Management & Public Infrastructure

Countywide Strategies

Strategy
4.2 Define specific service areas for utility systems to protect the viability of County land use goals.

Actions
A. Establish the geographic limits of standards-based utility service, and ensure adequate capacity and supply safeguards through the Commission Permit process prior to expanding existing service boundaries, or adding new boundaries in the case of the Rural Policy Area.

B. Prohibit connection to water distribution and wastewater collection systems when such requires crossing land outside a defined water or sewer service area, except as allowed herein.

Rural Policy Area – On site and Community Systems

Strategy
4.5 Protect the rural character of western Loudoun by considering the ability of an area to support onsite or community water and wastewater systems for any areas proposed for development.

Actions
A. Prohibit extension of central water and wastewater service into the Rural Policy Area, except as allowed herein to address a public health threat to an existing rural community or to serve public facilities on contiguous parcels immediately adjacent to the western boundary of the Transition Policy Area.
Loudoun County
Existing and Planned Facilities
2019 General Plan

- Animal Control
- Commissary
- Courts
- Fire & Rescue
- General County Facility
- Historic Site
- Library
- Park
- Park & Ride
- Parking
- Recreational
- School Administration
- School Elementary
- School High
- School Middle
- School Technology Center
- Sheriff
- Social Service
- Waste Mgt

County Owned & Leased
- County Work Site
- County Leased
- County Owned

Loudoun County IS NOT LIABLE for any use of or reliance upon this map or any information contained herein. While reasonable efforts have been made to obtain accurate data, the County makes no warranty, expressed or implied, as to its accuracy, completeness, or fitness for use of any purpose.
Chapter 7 - Implementation

Implementation Matrix

The ability to monitor and evaluate the progress of the *Loudoun County 2019 General Plan* is crucial to determining whether the Plan is achieving the community’s vision and goals. The implementation matrix that follows summarizes all action items found in the Plan that require subsequent County action, such as studies, analyses, program development, and regulatory changes. The implementation matrix is provided as a tool for the Board to use as the framework for developing a work program to implement the Plan.

**IMPLEMENTATION MATRIX**

<table>
<thead>
<tr>
<th>Chapter 6</th>
<th>Fiscal Management and Public Infrastructure</th>
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<tbody>
<tr>
<td>Action</td>
<td>Responsibility (Loudoun County Department or Agency)</td>
</tr>
<tr>
<td>4.2.B.</td>
<td>Prohibit connection to water distribution and wastewater collection systems when such requires crossing land outside a defined water or sewer service area, except as allowed herein.</td>
</tr>
<tr>
<td>4.5.A.</td>
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Mr. Patrick Giglio, Project Manager  
County of Loudoun  
Department of Planning and Zoning  
1 Harrison Street, SE  
Leesburg, VA 20175  

RE: CPAM-2020-0001, Public Facilities in the Rural Policy Area and Designation of Middle School as Feature on Public Facilities Map

Dear Mr. Giglio:

At the September 22, 2020 Planning Commission Public Hearing, the Planning Commission requested additional information specific to the proposed middle school use. The purpose of this letter is to offer additional information for the Commission’s consideration.

Cost Analysis of Extension of Central Utilities Compared to On-Site Treatment Facilities

In response to the question as to whether a cost analysis has been conducted for the extension of public utilities vs the provision of on-site facilities, LCPS staff responded that it has not. The reason an analysis has not been performed is because of the extensive requirements for such an analysis and, in this instance, public utilities are being requested. Without conducting a site-specific analysis, general information can be offered that will provide a perspective of the cost differential. A generally accepted cost for the extension of central sewer and water lines is $200-$300 per linear foot, depending on physical conditions. Loudoun Water utility lines are currently located in the northeast quadrant of the intersection of Evergreen Mills Road and Ryan Road, approximately 700 feet from the subject property. The lines will need to be extended from their current location into the site to serve the middle school. To be conservative, the width across the entire site is 3,100 feet. The cost to extend sewer and water lines to serve the property is estimated between $1.5 and $2.3 million dollars. 

\[(700 + 3100) \times 2 \text{ lines} \times ($200-$300)\]

The most recently bid LCPS project for an on-site utility is the replacement of the Luckets Elementary School wastewater treatment facility. This facility will serve the elementary school, the Luckets Community Center, and the Luckets Fire Station. On September 22, 2020, the School Board awarded the construction contract to the lowest responsive and responsible bid in the amount of $4,369,000.00. Design and associated costs result in a total cost for the Luckets Elementary wastewater treatment facility of $5.4M. Staff does not have a recent water treatment facility cost. Nonetheless, utilizing an example cost of one of the two facilities that would be required demonstrates the efficiency in extending central water and sewer lines to the proposed middle school site. It is also anticipated that on-site facilities would be more expensive than the Luckets facility given the comparative use size.

Attachment 3
addition to the cost benefits of extending central utilities, there will be lower maintenance and operations costs, efficiency in land utilization, and central water for fire protection. As noted at the public hearing, public buildings, such as schools, are national security assets utilized in the event of disasters and could best serve the public with the availability of central utilities.

**Due Diligence Studies Including Traffic Assessment for Proposed School Sites**

During the feasibility period of a land contract, due diligence review is conducted to ensure that the site is suitable for the use intended. Preliminary studies involve review of available records and data and further may include performing more detailed assessments as determined appropriate during the study period. These studies include review of rare and endangered species, wetlands, floodplain, topography, soils, historical and archaeological resources, utilities, and traffic.

Additional information was requested by Planning Commission members regarding the traffic assessment. During the review of a site, adjacent roads and the area transportation network are considered. Existing road conditions, planned road projects, and area development proffers are taken into account. The Countywide Transportation Plan and County Capital Improvement Plan are consulted. This information coupled with previous school project experience, enables LCPS staff to determine if the surrounding network will be sufficient and identify potential road improvements that may be necessary. In this particular case, the adjacent roads are Red Hill Road and Evergreen Mills Road. Improvements will be necessary for Red Hill Road, which is a two-lane, undivided, unpaved, local roadway. Evergreen Mills Road is a two-lane, undivided major collector, planned as a future four-lane divided roadway. The intersection of Red Hill Road and Evergreen Mills Road is signalized. Peak hour trip generation for the middle school is projected at 923 AM school, 458 PM school, and 246 PM commuter peak hour trips. Based on this information, the preliminary traffic assessment indicates that the area road network, with improvements, such as to Red Hill Road, can accommodate the proposed middle school use.

As noted at the public hearing, a detailed traffic analysis will be provided at the time of site plan. The scope of the analysis is determined by County staff and the study is reviewed by both the County and VDOT. The study will evaluate the road network, examine the proposed and planned land uses in the vicinity, incorporate background and new growth projections and recommend needed road improvements. The County will ultimately determine the road improvements required at the time of site plan.

**Proposed Uses and Potential Future Uses**

CPAM 2020-0001 seeks the identification of a middle school as a feature shown on the County’s Comprehensive Plan. Any other public use must be submitted for consideration as a Commission Permit under a separate legislative review. The purpose of a commission permit is to review the proposed use to determine if it is in compliance with the adopted comprehensive plan. In addition to the Commission Permit, any use must meet the requirements of the Zoning Ordinance, Facilities Standards Manual, and other code requirements and regulations. For the public school use, there are specific development performance standards within the Zoning Ordinance in addition to the requirements of the A-3 Zoning District.
Both the School Board and the Board of Supervisors review and approve capital projects. The proposed middle school, MS-14, is planned for the Dulles North area and is to open in Fall 2024 (2024-2025 school year). Reference to the middle school has been included in CPAM 2020-0001 for contractual reasons (i.e., to ensure that the proposed use is approved before purchasing the property) and for service delivery reasons. After land acquisition, a site plan, including the required traffic and archaeological studies, as well as construction plans and profiles must be submitted for review and approval. The engineering and approval process take approximately two years. Once the site plan and construction plans are approved, the construction process may begin which also requires +/- two years.

We appreciate the Commission’s time and consideration.

Sincerely,

Sara Howard-O’Brien, AICP
Land Management Supervisor

Enclosures: Graphic Depicting Existing Water and Sewer Lines

C: Beverly I. Tate, LCPS Planning Director
650-700 feet to property boundary
RESOLUTION OF THE LOUDOUN COUNTY PLANNING COMMISSION
RECOMMENDING APPROVAL OF CPAM-2020-0001

WHEREAS, the Board of Supervisors of Loudoun County, Virginia (“Board”), on June 16, 2020, initiated a proposed text amendment to the Loudoun County 2019 General Plan (“2019 General Plan”) to allow public facilities on contiguous parcels in the Rural Policy Area located immediately adjacent to the western boundary of the Transition Policy Area to connect to the central water and wastewater system; and

WHEREAS, the Board and the Loudoun County School Board have contracted to purchase two parcels of land totaling approximately 172.9 acres located on the westside of Evergreen Mills Road (Route 621), on the south side of Red Hill Road (Route 617), and southwest of Ryan Road (Route 772), to be used as a future middle school site (“Future Middle School Site”), pending satisfactory completion of a due diligence period by December 2020; and

WHEREAS, staff prepared CPAM-2020-0001 to include (i) the proposed text amendment to the 2019 General Plan as initiated by the Board on June 16, 2020, and (ii) a proposed amendment to the 2019 General Plan Existing Facilities Map to add the Future Middle School Site; and

WHEREAS, the Planning Commission conducted a public hearing on CPAM-2020-0001 on September 22, 2020, referring the application to work session on October 8, 2020 for further discussion and action; and

WHEREAS, for reasons identified by Commission members during the work session,

NOW, THEREFORE, BE IT RESOLVED, on this 8th day of October, 2020, the Loudoun County Planning Commission hereby recommends that the Board of Supervisors of Loudoun County approve and adopt CPAM-2020-0001 as presented to the Planning Commission.

Adopted by the Loudoun Planning Commission on October 8, 2020.
ATTEST:

Deby Dyson, Assistant Secretary
Loudoun County Planning Commission
RESOLUTION OF THE LOUDOUN COUNTY PLANNING COMMISSION
RECOMMENDING DENIAL OF CPAM-2020-0001

WHEREAS, the Board of Supervisors of Loudoun County, Virginia (“Board”), on June 16, 2020, initiated a proposed text amendment to the Loudoun County 2019 General Plan (“2019 General Plan”) to allow public facilities on contiguous parcels in the Rural Policy Area located immediately adjacent to the western boundary of the Transition Policy Area to connect to the central water and wastewater system; and

WHEREAS, the Board and the Loudoun County School Board have contracted to purchase two parcels of land totaling approximately 172.9 acres located on the westside of Evergreen Mills Road (Route 621), on the south side of Red Hill Road (Route 617), and southwest of Ryan Road (Route 772), to be used as a future middle school site (“Future Middle School Site”), pending satisfactory completion of a due diligence period by December 2020; and

WHEREAS, staff prepared CPAM-2020-0001 to include (i) the proposed text amendment to the 2019 General Plan as initiated by the Board on June 16, 2020, and (ii) a proposed amendment to the 2019 General Plan Existing Facilities Map to add the Future Middle School Site; and

WHEREAS, the Planning Commission conducted a public hearing on CPAM-2020-0001 on September 22, 2020, referring the application to work session on October 8, 2020 for further discussion and action; and

WHEREAS, for reasons identified by Commission members during the work session,

NOW, THEREFORE, BE IT RESOLVED, on this 8th day of October, 2020, the Loudoun County Planning Commission hereby recommends that the Board of Supervisors of Loudoun County disapprove and decline to adopt CPAM-2020-0001.

Adopted by the Loudoun Planning Commission on October 8, 2020.

Attachment 5