

LOUDOUN COUNTY SCHOOL BOARD
STATEMENT OF JUSTIFICATION
Commission Permit (CMPT-2022-0003)
Special Exception (SPEX-2022-0038)
Academies of Loudoun Service Center
August 3, 2022

Proposal

The Loudoun County School Board seeks approval of a Commission Permit (CMPT) and Special Exception (SPEX) to allow a public utility service center with outdoor storage to be co-located on The Academies of Loudoun 119-acre property. A copy of a buffer landscape waiver is also included in this submission and is an active application under review by the Zoning Administrator (WAIZ 2022-0010). The site is located at 42075 Loudoun Academy Drive, on the west side of Sycolin Road, to the east of Gulick Mill Road and to the southwest of the Dulles Greenway, in Leesburg and is identified as PIN 194-16-6764. Access to the site is from Sycolin Road with an emergency access only to Gulick Mill Road. The property is zoned TR-10, Transition Residential – 10, which allows public utility service centers by special exception. The property is within the AI (Airport Impact Overlay) District (within one mile of LDN 60 contour for the Leesburg Airport), the FOD (Floodplain Overlay) District – Minor, and steep slope district (moderate and very steep). As a public use, a Commission Permit is required pursuant to Section 6-1100 of the Zoning Ordinance. The property is located within the Transition Policy Area and is designated for Transition Large Lot Neighborhood. The site is located within the Catoctin Election District.

The primary purpose of the proposed public utility service center is to house the grounds and inclement weather maintenance operations of LCPS. The site would be used to store grounds maintenance equipment (trucks, trailers, mowers) as well as sand, salt, and similar materials to be accessed during inclement weather for treatment of LCPS and County of Loudoun owned properties (i.e., driveways and parking lots). LCPS has three of these facilities in the County. One is at the Western Loudoun Service Center (ZMAP 2015-0014, CMPT 2015-0011, SPEX 2015-0056 and SPMI 2015-0019) across Business 7 from Harmony Middle School, the second is at the Lightridge High School/Hovatter Elementary School campus, south of Braddock Road, at 41025 Collaboration Drive (CMPT 2017-0005 and SPMI 2017-0018), and the third is at the County Government Center site at 1002C Sycolin Road SE in Leesburg. Upon approval, the latter operation would move from the County Government Center site to the proposed location.

The proposed center would provide for the long-term storage of materials and equipment to maintain school and county (for inclement weather only) facilities, including:

- A two to three walled structure with roof of approximately 20,000 SF to keep treatment materials (road salt, sand, and stone dust) under roof and on a concrete or asphalt floor. The materials would be loaded onto spreader trucks that would drive through the proposed structure for filling. Loudoun Academy Drive, which provides access to this facility, and the accessway around the facility, allow trucks to queue for loading, drive through the building and then exit back onto Loudoun Academy Drive to go to their assigned site. Proximate to the storage materials is a proposed garage of approximately 1000 SF to store

the loaders, and a small (350 SF) brine tank building.

- Storage buildings (pole-barns) to protect equipment from the weather, total square footage of approximately 52,000 SF.
- Outside storage of vehicles (trucks), equipment (snowplows, salt spreaders, mowers, trailers, spare dumpsters and shipping containers, and similar equipment)
- A truck/heavy equipment wash

The proposed use would also include a small engine repair facility of approximately 5,000 square feet that would serve as both a location to service equipment and to be a presence at the public utility service center. Equipment to be maintained includes mowers, leaf blowers, hedge trimmers, weed eaters, snow blowers, snowplows, woodchippers and similar equipment. The small engine repair shop would be a regular work site (as compared to the inclement weather facility). The co-location of this use proximate to the materials storage center would provide the ability for repair immediately, if needed, and provide on-site workers to monitor the facility.

Daily, approximately 20 employees would report to the public utility service center. The majority (16) would arrive and switch to work trucks and depart to a designated school site for grounds maintenance. Typically, the employees work in pairs, i.e. eight trucks leaving the site for work at a designated school site. There are four employees that would work in the on-site small engine repair shop. During inclement weather, additional employees would come to the site to secure snowplows, snow blowers, and treatment materials to clear school facilities of ice and/or snow. The County would also come to this site for treatment materials during winter weather. The County would not store anything on site except a loader (for loading treatment materials into trucks). The number of days of the year this occurs is limited and frequently happens when schools are closed. There are 12 snow days built into the school calendar. Between 2016 and 2021 the average mobilization was 10 days.

Trucks utilized for inclement weather maintenance would be loaded with sand/salt and go to a designated school site for treatment. The number of times a truck would reload would depend on the weather. For most days, there would be no need to reload but if the weather were severe, a truck could reload as many as three times. As noted above, LCPS has two additional facilities (western Loudoun and Dulles South). Trucks serving those areas would reload at the area facility rather than traveling back to Leesburg.

LCPS “reclaims” sites and does not pre-treat. Treatment typically occurs in the early morning when there is a two-hour delay for schools or during the day if schools are closed. Trucks would begin as early as 4 a.m. There is no night work, and the treatment of school sites would stop by 8 p.m. The employees that are at the site regularly begin work between 6:30 a.m. and 7 a.m. and leave by 3 p.m.

A landscape buffer waiver pursuant to Section 5-1409 (A) of the Zoning Ordinance has been submitted and is an active application under review. A copy is included in this application. The waiver proposes to utilize evergreen tree plantings in lieu of a six foot in height fence, wall or

berm. The proposed buffer will be more effective by filling in any gaps, be taller than the required fence/wall/berm and provide a year-round buffer. The details of this request are included in the submitted supplemental letter.

In summary, the proposed facility would serve as the home base for small engine repair, grounds maintenance, and inclement weather treatment which are essential operations for the 100+ LCPS facilities.

Background:

On June 17, 2015, the Board of Supervisors approved Commission Permit 2015-0002 for The Academies of Loudoun. This educational center, which opened in the Fall of 2018, houses three academies:

- The Academy of Science (AOS) is an advanced four-year academic program that provides students the opportunity to deeply engage in mathematics, science, and research.
- The Monroe Advanced Technical Academy (MATA) offers a college and career ready curriculum for multiple career pathways. The program is based on an integrated STEM and entrepreneurial curriculum which includes a range of opportunities under one- and two-year options: auto service technology, biotechnology, building construction, computer science, cosmetology, culinary arts, EMT, firefighter and justice careers, environmental, health and medical careers, and video/TV production.
- The Academy of Engineering & Technology (AET) provides academic STEM (Science, Technology, Engineering and Mathematics) pathways for students to engage in the study of engineering, information technology, and entrepreneurship under two- and four-year study options.

Students attend The Academies of Loudoun on alternating days taking courses in the particular Academy's focus and attend their home school for all other subjects.

The 119-acre site is of sufficient size to accommodate the proposed public utility service center. There will be no impact to the Academies of Loudoun as the proposed use will be located at the opposite end of the site, be separated, and buffered by existing and proposed vegetation, and add minimal traffic at hours that differ from the school use.

Commission Permit and Special Exception Factors for Consideration:

Zoning Ordinance Sections 6-1101 and 6-1309 identify the factors to be considered in the review of a Commission Permit and Special Exception, respectively. Central to the review of a Commission Permit is the need to establish that the use is consistent with the applicable comprehensive plan policies.

- 1. Whether the proposed commission permit and special exception are consistent with the Comprehensive Plan.**

The proposed public use site is governed under the policies of the Loudoun County 2019 Comprehensive Plan (2019 GP). The subject property is designated for Transition Large Lot Neighborhood Place Type which includes low density residential communities with significant open space (50%) and the opportunity for serving public facilities.

The proposed public use is critical to the maintenance and operation of LCPS and County operated facilities. There are 100+ LCPS sites that require year-round routine grounds maintenance and the clearing of snow and ice after winter storms. The County will also utilize this site for treatment of snow and ice at County facilities.

The Academies of Loudoun property is zoned TR-10, which includes a 70% open space requirement. The development of the proposed use will maintain the TR-10 open space standard and protect environmental features including a small stream, wetlands, minor floodplain, and steep slopes. There are mature tree stands, which will be maintained on significant areas of the site. To implement the proposed use, it will be necessary to remove a portion of the existing trees. The site's tree cover will provide an excellent buffer to the adjacent properties and will be supplemented by the proposed evergreen buffer. (Reference the Special Exception/Commission Permit Plan)

The proposed public utility service center complies with the policies of the 2019 GP as a serving public facility. The proposal includes the provision of significant open space, the protection of environmental features, and the buffering and screening of the use. The proposal also complies with policies for co-location by placement on The Academies of Loudoun site and through the joint LCPS/County utilization of the facility. This will allow for operational efficiency as well as the efficient use of land resources.

2. Whether the level and impact of any noise, light, glare, odor or other emissions generated by the proposed use will negatively impact surrounding uses.

The proposed public utility service center is not anticipated to negatively impact the surrounding uses. While the majority of the surrounding properties are vacant, there is a residential community situated to the south. The closest portion of the proposed use is to be 250+ feet from the common property boundary with this neighborhood. Within this area there is an existing hardwood tree stand which will be supplemented by an evergreen tree buffer. The use itself has been designed to locate the back wall of the pole barn storage structures to face outward, thereby adding an additional screen to the adjacent properties and Gulick Mill Road. The inclement weather facility is planned toward the northern boundary and will be approximately 1200 feet from the Goose Creek Bend community.

There will be high activity on the site when mobilization is implemented for weather treatment at public facilities. This occurs a limited number of days during the winter months. No adverse noise, light, glare or odor impacts are anticipated. The distance between the use and the residential community, coupled with the planned buffers, will minimize potential noise or light. Lighting of the facility will consist of security lighting

that will be directed inward and downward to the facility. There will be no odors associated with the proposed use.

3. Whether the proposed use is compatible with other existing or proposed uses in the neighborhood and on adjacent parcels.

The proposed use will be compatible with the surrounding land uses:

North: Vacant Property

South: Goose Creek Bend Subdivision

East: The Academies of Loudoun (on-site)
Sycolin Road

West: Gulick Mill Road
Vacant Property

The proposed public utility service center is proposed on the rear portion of the 119-acre Academies of Loudoun property. The use itself is low intensity and predominately storage but for the few days of the year (on average 10) when bad weather occurs. On a daily basis, there will be 20 employees reporting to the site, the majority of which will work off-site at various LCPS facilities. The planned small engine repair shop is positioned to be 950+ feet from the residential use to the south and will be separated by on-site storage buildings and buffered by mature tree stands and a planned evergreen buffer. There will only be four regular employees at the repair shop. For those days when inclement weather requires treatment of LCPS and County facilities there will be an increase in activity at the site.

4. Whether the proposed special exception adequately protects and mitigates impacts on the environmental or natural features, including, but not limited to wildlife habitat, vegetation, wetlands, water quality including groundwater, air quality, topographic, scenic, archaeological or historic features, and agricultural and forestal lands.

The 119-acre property includes approximately 6.25 acres of moderately steep slopes and 1.28 acres of very steep slopes. These slopes are located outside of the project area to the north of The Academies of Loudoun building. There is a small stream on the property, 5.5 acres of minor floodplain, and approximately 16.6 acres of wetlands. These features are situated between The Academies of Loudoun site and the proposed project area. A new wetlands study was conducted for the SPEX/CMPT area in April of 2022 by Wetlands Studies and Solutions, Inc (WSSI). The wetlands identified within the project area are approximately 1.5 acres in size. The study has been submitted for jurisdictional determination review. It is not anticipated that any wetlands will be impacted but should

encroachment be necessary the appropriate permits will be secured. Development of the site will incorporate measures to address stormwater hotspots. These will be designed as a part of the site plan for the proposed use.

A review for endangered and threatened species (ETS) was also conducted in April 2022, by WSSI. A letter from the Virginia Department of Conservation and Recreation (DCR) including review results from the U.S. Fish and Wildlife Service (USFWS) indicates that no natural heritage resources have been documented in the study area. The site is within an Ecological Core (C5). Ecological Cores are areas of unfragmented natural cover with at least 100 acres of interior that provides habitat for a wide range of species. DCR recommends mitigation measures to preserve the natural patterns and connectivity of habitats including incorporating natural vegetation buffers and retaining natural corridors. The existing floodplain/wetlands area situated between The Academies of Loudoun and the proposed use will be retained. Further, the proposal intends to utilize existing vegetation as a part of the planned buffers. The ETS review recognizes species of concern including the green floater (no perennial streams within the site), the northern long-eared bat (no known hibernacula or maternity roosts are present within Loudoun County) and the monarch butterfly.

A tree survey is included on Sheet 5 of the SPEX/CMPT Plan. The existing cover is predominately upland hardwood forest ranging in age from 25-50 years and is generally of good quality. Trees of 30 inches in diameter or greater within or adjacent to the project site have been identified. Significant areas of existing forest will be retained to buffer the proposed use. An additional evergreen buffer around the site is proposed.

A Phase IA Archaeological Survey was conducted by Dovetail Cultural Resource Group in April of 2012. Approximately 70% of the site was considered to have a high probability of containing archaeological sites worthy of recordation and 30% of the site was considered to have low probability. A Phase I was recommended for the area of the site considered to have a high probability for resources. Dovetail also recommended that specific surface features observed during the Phase IA be documented. These include a possible road trace, a dirt road, and the remains of three stone walls. There is a cemetery off-site and adjacent to the eastern property boundary. It was recommended that a careful visual inspection and systematic soil probes be conducted on-site in the immediate vicinity of the cemetery to determine if there are any additional unmarked graves on the property.

In October and November of 2014, Dovetail undertook a Phase IB Cultural Resource Survey to complete the archaeological and architectural investigations recommended in the Phase IA. Results from the investigation included one previously recorded and one newly recorded resource. The previously recorded off-site Etcher Family Cemetery retains its integrity of setting and location. It is situated to the east of The Academies property and is contained within stone walls. No additional unmarked graves were located. It is recommended that all site work avoid this adjacent (off-site) cemetery. The newly recorded resource identified as the Morrisworth Landscape Features (named for the property's legal description which indicates the property was previously a part of the

Morrisworth Tract) was examined but also not recommended as eligible for inclusion on the National Register of Historic Places. The features included a road trace, remains of stone boundary walls, and a horse jumping fence. The Phase IB indicated that these features are remnants of previous occupation and that the integrity of these features has been compromised. It is also noted that these types of landscape features are common throughout Loudoun County and can be found on most rural and agricultural properties throughout the County, some in much better condition. The Phase IA and Phase IB surveys combined equate to a Phase I Archaeological Investigation. No additional architectural or archaeological work was recommended.

5. Whether the proposed special exception at the specified location will contribute to or promote the welfare or convenience of the public.

Yes. The function of the proposed use is to support LCPS and County facilities which are ultimately utilized by Loudoun County citizens. This facility serves to make the public facilities safe to access during times of bad weather. Further, this facility serves as the base for ground maintenance of LCPS facilities and to maintain the equipment used for both grounds maintenance and inclement weather.

6. 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.

Yes. The infrastructure to serve the proposed public utility service center is in place. Utilities were previously extended for the development of The Academies of Loudoun. The site can be accessed via Sycolin Road, and by Gulick Mill Road for emergency purposes. The internal road between the rear of the Academies and the site will be upgraded to a paved road, 24 feet in width. The traffic associated with the proposed use is minimal and off peak. The workday for on-site employees is 6:30-7:00 AM to 3 PM. Activation for bad weather treatment typically occurs when schools are either delayed or closed. As a part of the traffic study scoping meeting, it was determined that a Trip Generation Memo was appropriate for this use due to the low trip volumes.

Summary

The proposed public use site is consistent with the policies of the 2019 Plan. Specifically:

- The School Board and the Board of Supervisors have determined the need for the proposed public utility service center as initially evidenced in the FY 2018 County of Loudoun Adopted Budget.
- The proposed site is located in central Loudoun which will afford good accessibility to the LCPS and County facilities it will support. The Transition Area is planned for low density residential growth and policies recognize the need to provide public uses. The 2019 Plan supports the co-location of facilities to increase operational efficiency and utilization of

land resources.

- Safe and convenient access will be provided to the site via Sycolin Road, a planned major collector road.
- The proposed development will take into account planning goals related to the protection of environmentally sensitive areas and the incorporation of tree save areas into proposed buffers. A wetlands delineation, archeological studies, review for rare and endangered species and tree inventory have been completed.
- The proposed site will be served by public sewer and water and will have all utilities needed to support the proposed use.
- The proposed use is compatible with the surrounding land uses. Buffers will be provided along the property boundaries with special attention adjacent to the large lot residential neighborhood to the south. Existing trees will be utilized as a part of the buffers to the extent practical and supplemented with an evergreen planting. Buildings are positioned to further screen the site. Proposed security lighting will be cutoff and shielded, directed downward and toward the interior of the property.
- The proposed use will comply with the zoning standards of the TR-10 District.
- Overall, the proposed location, character, and extent of the proposed use is in substantial accord with the County's Adopted Comprehensive Plan.

In summary, the proposed public use site is consistent with the Plan policies and will meet a critical service need. Your favorable consideration is respectfully requested.