

**LOUDOUN COUNTY SCHOOL BOARD
STATEMENT OF JUSTIFICATION**

Commission Permit (CMPT-2022-0003)

Special Exception (SPEX-2022-0038)

Minor Special Exception (SPMI-2022-0006)

Academies of Loudoun Service Center

August 3, 2022

Revised December 7, 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 landscape buffer modification (SPMI-2022-0006) is also requested. 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 partially within the AI (Airport Impact Overlay) District (within one mile of LDN 60 contour for the Leesburg Airport); the property contains minor floodplain (FOD, Floodplain Overlay District – Minor), and moderate and very steep slopes. 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 Little River 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 and vehicles 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 accessory 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. This use is incidental to the grounds and inclement weather operations. 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 modification pursuant to Sections 5-600 and 5-1409 (B) (2) of the Zoning Ordinance is requested. For uses such as a public utility service center, Section 5-600 allows the additional regulations to be modified by Minor Special Exception. The modification 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, will be taller than the required fence/wall/berm and will provide a year-round buffer. The details of this request are included on pages 14-15.

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.

Site Selection and Facility Need:

The existing inclement weather facility, located at the County's government center on Sycolin Road, is of inadequate size. LCPS grounds operation are also located on Sycolin Road on a separate site. Neither of these facilities meet today's needs efficiently and will not be able to

meet the future service demand. The Sycolin Road property has always been a temporary location. These facilities need to be relocated as soon as possible to accommodate other County programed facility needs.

LCPS and the County have developed a process for the review of sites needed for new school and associated support facilities, such as the proposed public utility service center. As a part of the Capital Improvement Plan the service area for planned facilities is identified along with the development scope to determine the site requirements (acreage, access, building square footage, parking, and similar project needs). Potential sites are then identified within the desired service area and evaluated to determine feasibility. LCPS staff initially identifies potential sites, conducts an analysis of these properties, and presents the sites to the Land Matrix Team (LMT). The LMT is comprised of County and LCPS staff from various departments to provide a comprehensive review. The LMT considers the sites, offers input, and may suggest additional sites for evaluation. Collectively, the LMT determines the sites to be taken forward to the decision makers (School Board and Board of Supervisors) for consideration.

The desired location for the proposed public utility service center is Central Loudoun because it affords good access to the overall County. This proposed facility was first identified in the FY2018-FY2023 School Board Adopted Capital Improvement Program (CIP), dated November 29, 2016. Initially, a site was to be provided within the County government center property on Sycolin Road. However, after consideration of various sites at this location, in 2020 it was determined an alternate site would be needed. (A change in the Countywide Transportation Plan placed a future road alignment through one desired site and physical constraints on other sites did not allow for all the service center components to be accommodated.) A search within the Central Loudoun area was undertaken to identify potential properties. **Twenty-three** sites were considered, many of which could not be utilized due to insufficient size. Other sites could not be utilized because of topography, vehicular access, insufficient utilities, zoning requirements, easements, and/or purchase by others during the study period.

After five years of searching for a site, the Academies of Loudoun property was selected because it:

- is centrally located
- possesses good access
- is physically suited for development
- is of sufficient size to combine the LCPS grounds maintenance and inclement weather operations
- will support the County's inclement weather operations
- is large enough to be developed and protect the site's environmental resources
- will allow the use to be effectively buffered from adjacent properties and Gulick Mill Road
- is already owned by LCPS (no additional land costs), and
- will meet the service needs for the foreseeable future (30 years plus).

In terms of use, the service center is predominately storage. For most of the year, the service center operates with 20 employees, 16 of which report to the site to switch into their work trucks and go to other locations for the day. Four employees will work at the small engine repair shop. The typical workday (M-F) hours are 6:30 a.m. to 3 p.m. The use generates minimal traffic, lighting, and noise. During snow and ice events, the site will be utilized as an inclement weather facility for LCPS and County facilities. These hours are typically from 4 a.m. to 8 p.m. On average, the inclement weather facility component is mobilized ten times a year. The inclement weather facility has been intentionally positioned away from the residential neighborhood located to the south and is 1200 feet from the common property boundary with the Goose Creek Bend community.

LCPS operates and maintains over 100 schools and support facilities. As the County's growth continues, so will the LCPS and County facilities necessary to meet public service demands. This facility is designed to support the current and future needs of LCPS for centralized grounds and inclement weather operations as well as the County's inclement weather operations. All aspects of the use will be addressed as a part of the site design and operation including environmental protection, a comprehensive stormwater management plan, the provision of substantial buffering, and minimized lighting.

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 exceptions 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. The proposed landscape modification seeks to utilize all evergreen tree plantings for the Type C plant units in order to provide a year-round screening surrounding the public utility service center. (Reference the Special Exception/Commission Permit Plan and pages 14-15 of this Statement)

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 common property boundary with 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. 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 parking lot and security lighting that will be directed inward and downward to the facility. A lighting plan has been provided as a part of the Special Exception/Commission Permit plan. No adverse noise, light, glare or odor impacts are anticipated.

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.

The site design recognizes the Reservoir Protection Area (RPA) and provides for its protection. The service center project will be located outside of the River and Stream Corridor Resource (RSCR) except for the small, perpendicular encroachments necessary to provide adequate drainage outfall. The on-site RSCR ranges in width from approximately 300-445 feet. Please reference the Special Exception and Commission Permit Plan.

Comprehensive Stormwater Management Plan

A comprehensive stormwater management plan addressing water quality and quantity will be provided as a part of the site plan submission for the project. Water quality for the project will be provided by multiple manufactured treatment devices compliant with Virginia Stormwater BMP Clearinghouse (the “Clearinghouse”) Practice 17 for Filtering Devices, and the creation of significant areas of Virginia Runoff Reduction Method (VRRM) land cover easement over onsite undisturbed open space and wooded areas to be determined as a part of final engineering. This easement will ensure that no development will occur within these areas, which will include the RSCR. Additional water quality treatment methods may include extended detention volumes designed in accordance with Clearinghouse Practice 15 in one or both of the proposed above ground ponds or other methods approved by the Clearinghouse and Loudoun County.

All water quality requirements for the project will be met onsite, without the purchase of offsite nutrient credit as allowed by State and Loudoun County regulations.

Water quantity for the project will be provided by two above ground detention ponds. Both ponds will be designed to reduce peak flow rates to meet the Channel Protection and Flood Protection requirements of Section 5.230 of the Loudoun County Facilities Standard Manual (FSM). Since both ponds will discharge to a natural conveyance system, Channel Protection requirements will be demonstrated per the Energy Balance methodology of FSM 5.230.A.2.c. The maximum peak flow rate of the 1-year, 24-hour rainfall event from the proposed improvements will be reduced to less than the flow that would be generated from the same area in a completely forested condition.

The proposed service center includes the parking of trucks, a truck/equipment wash, and small engine repair facility. Under the County’s FSM (Section 5.230.C.1.) these uses are considered to be stormwater hotspots. There will be a comprehensive treatment train in place for all runoff from these hotspot areas. A treatment trail utilizes multiple processes to maximize the control and treatment of pollutants.

Before the runoff is allowed to leave the site, it will be directed first to hydrodynamic separators where the runoff will be cleaned of oil, trash, debris, and other materials that are undesirable in the natural environment. As noted in the Table 10 of FSM Section 5.230, hydrodynamic separators are Loudoun County’s preferred treatment method for runoff from areas subject to oil and hydrocarbons because of their efficient separation of oil, sediment, and debris and their relative ease of maintenance.

Discharge from the hydrodynamic separators, which will have been cleaned of oil, other hydrocarbons and other debris, will then be directed to water quality filtering devices, which will provide for phosphorous removal. Finally, the discharge from the water quality devices will be directed to the above ground stormwater management ponds where peak flow reduction will occur prior to discharge into the drainage channel. The proposed treatment train will ensure that stormwater runoff from the site will strictly comply with all channel protection and flood protection requirements mandated by the County and State.

Salt Storage and Handling Management

The northern portion of the site is to be utilized for the storage of materials (salt, sand, and stone dust) that will be used to treat LCPS and County facilities during snow and ice events. The average number of yearly mobilizations for inclement weather treatment from 2016-2021 was ten. While limited in use, this facility is critical to the operations of LCPS and the County and is part of the overall County emergency response plan.

The storage and use of salt requires special handling. The proposed facility has been consciously designed for salt containment, limiting salt exposure, and capturing any stormwater runoff proximate to the salt storage, loading, and unloading area. The salt will be stored inside a roofed, walled building that will be completely protected from the elements. Salt deliveries to the facility and salt loading to individual salt trucks will occur under roof and on a partially roofed “salt pad” that will be surrounded by a containment berm. No runoff in this area will be allowed to leave the salt pad uncontrolled. The salt pad will drain to an inlet or series of inlets within the pad. Pipe(s) leading from the inlet(s) will convey the water to a valve specially designed for use in salt water. Prior to the beginning of “salt season”, which is generally defined as November through March, the valve will be pre-positioned such that all runoff from this area is directed to underground double-walled tanks. The tanks will be made of fiberglass or other material that is impervious to the effects of salt. The tanks will be completely self-contained and will not have any possibility of discharge to the downstream or natural drainage systems. The tanks will function as cisterns to capture and hold all runoff that comes from the salt storage/pad area. The tanks will be equipped with overfill and leak detection systems to prevent potential salt water from inadvertently escaping the tanks into the natural environment. As is customary for salt handling sites, the tanks will be sized such that they will be pumped out on an as needed basis to either onsite brining operations or offsite to an approved receiver of salt-water during “salt season”. The estimate of pumping operations is based on historical weather precipitation data provided by the National Weather Service, but actual pumping operations will be determined by measured precipitation and the water levels in the tanks.

The control valve will remain in its “salt season” position (directing all water to the tanks) until at least April 1 each year. Before the valve position is changed at the end of “salt season”, the “salt pad” will be thoroughly swept, washed down and cleaned of salt. After the final cleaning and rinsing of the pad, the tanks will be pumped one final time for the season so that salt water is not allowed to sit stagnant in the tanks. Once the salt pad is cleaned and the tanks are pumped

empty, the valve will be positioned to direct water from the now-clean pad to the onsite storm drainage system. The storm drainage system will route runoff to a manufactured water quality filtering device and eventually into one of the above ground stormwater management ponds that will provide the required peak flow reductions. No salt deliveries, loading, unloading, or other handling operations will occur while the valve is set to the non “salt season” position. Should any salt activities need to occur outside of “salt season”, the valve will first be set back to the “salt season” position. Upon completion of the out of season salt activities, the pad shall be thoroughly cleaned as described and the tanks pumped before returning the valve to its non “salt season” position.

There are two additional areas on the south side of the site that will require capture and storage of runoff from areas that may be subject to salt activities. Salt trucks will be parked in the three large pole barns at the south and west side of the site. Even though the pole barns will be roofed and only limited precipitation will fall on the stored salt trucks, the floor of the pole barns will be sloped such that all runoff from under the pole barn roofs will be contained and directed to an underground tank(s). Likewise, the truck wash bay will be surrounded by a small berm or depressed slightly such that all wash water will be contained and directed to an underground tank(s). As with the salt containment system on the north side of the site, these tanks will be pumped regularly and will be provided with a diverter valve so runoff from areas subject to salt is only allowed to flow into the underground tanks during the salt season. In non-salt season periods, once these areas have been thoroughly cleaned of salt, the valves may be switched so that the runoff is directed to the hydrodynamic separators, manufactured treatment devices, and stormwater management ponds.

Stormwater Pollution Prevention Plan

A comprehensive stormwater pollution prevention plan (SWPPP) will be developed by the applicant and submitted to and approved by Loudoun County prior to issuance of the Virginia Stormwater Management Program (VSMP) Permit and the approval of the Site Plan application for the improvements proposed with this Special Exception and Commission Permit. The SWPPP will contain detailed information much of which will be specifically related to the hotspot and salt storage and handling areas noted above, as well as stormwater controls related to construction of the proposed improvements and the day-to-day use of the site once construction is complete. The SWPPP will provide detail on spill prevention, control, and cleanup measures, in the unlikely event of a spill or accident. The SWPPP will provide names and contact information of responsible parties in the event of any emergencies. Detailed operation and maintenance instructions for the hydrodynamic separators and the entire system designed to capture and hold salt water will be included in the SWPPP.

- 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. Development and operation of the facility will include a comprehensive stormwater management plan. In addition, the facility will include structures designed specifically for the storage and handling of salt.
- 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 parking and 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.

Supplement Information for Minor Special Exception (SPMI-2022-0006) Modification to Landscaping Requirements

The proposed public utility service center use is regulated by Section 5-621 of the Zoning Ordinance. This section requires a Type C buffer for Public Utilities. The Type C buffer is:

- to be 25 feet in width,
- provide 120 plant units for every 100 linear feet, and
- provide a 6-foot in height fence, wall or berm, providing a minimum opacity of 95%.

Pursuant to Section 5-600, modifications may be requested to the requirements of Section 5-621, Public Utilities, through a Minor Special Exception Request. Section 5-1409 (B) (2) also allows legislative modifications to the landscaping requirements. The following modifications to the Type C landscape buffer and Sections 5-621, 5-1404, 5-1405, and 5-1408 of the Zoning Ordinance are requested:

- Allow the use of evergreen tree plantings in lieu of a 6-foot in height fence, wall or berm
- Allow the use of all evergreen trees (no deciduous tree plantings)
- Allow the plant types to be all trees (no shrubs, ornamental grass, or perennials)

It is proposed to maintain a buffer of deciduous trees surrounding the site and to supplement this deciduous buffer with the planting of evergreen trees (603 trees). In addition, there will be post and beam storage structures that consist of a 100% opaque wall to be positioned toward the southern, northern, and western property boundaries. While the conserved existing deciduous vegetation meets the number of plant unit requirements for the Buffer Yard Type C, the evergreen trees to be planted along the perimeter of the facility will fill in any gaps and provide a year-round buffer, thereby providing a more effective screen for the facility than a 6-foot in height fence, wall, or berm. Cumulatively, the deciduous tree, evergreen tree and storage structures will improve upon the existing regulations and exceed the public purpose of the existing regulation to effectively screen the proposed service center.

Justification Related to Section 6-1309: Issues for Consideration

There are six factors to be reviewed in the consideration of a Minor Special Exception. Of these, three are applicable to the proposed landscape modification:

- The proposed modification is *consistent with the policies of the Comprehensive Plan* by enhancing the proposed open space and effectively buffering the proposed use through the provision of a significant evergreen planting and strategic placement of solid structures. The proposed modification is consistent with the low-density character of the Transition Large Lot Neighborhood Place Type.
- Combined with the proposed distances from existing uses, the proposed evergreen plantings and opaque wall placement will strengthen *compatibility with uses on adjacent*

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parcels.

- The proposed evergreen tree plantings will enhance *environmental or natural features including wildlife habitat, vegetation, wetlands, water quality, and air quality.*

Approval of the proposed landscape modification is respectfully requested.