

County of Loudoun
Department of Planning
MEMORANDUM

DATE: August 18, 2009
TO: Nicole Steele, Project Manager, Land Use Review
FROM: Pat Giglio, Planner, Community Planning
SUBJECT: SPEX 2008-0061, SPEX 2008-0062 & CMPT 2008-0020
White's Ford Park, 2nd Referral

BACKGROUND

The applicant, Northern Virginia Regional Park Authority (NVRPA) is requesting a pair of Special Exceptions (SPEXs) and a Commission Permit (CMPT) for the establishment of a public park on a 275-acre property with Potomac River frontage located southeast of Lucketts. The subject property is zoned AR-1 (Agriculture Rural-1) and is governed under the provisions of the Revised 1993 Zoning Ordinance. The proposed regional park would be programmed for passive recreational uses and will feature hiking trails, equestrian trails, camping and cabin facilities, picnic pavilions, and a boat launch with concessions. Many of the proposed passive uses are permitted by-right within the zoning district, however the proposed camping facilities (up to 100 campsites) requires a Minor Special Exception and the boat launch with concessions requires a Special Exception within the zoning district. A Commission Permit is also required for the overall use of the property for a public park.

The applicant has responded to Community Planning's first referral and several issues remain outstanding issues are discussed below. These issues should be addressed to ensure that the policies and intent of the Revised General Plan are being met with the proposed project. This referral supplements the first referral dated July 13, 2009.

OUTSTANDING ISSUES

A. COMPATIBILITY

The policies of the Revised General Plan support the establishment of uses in the Rural Policy Area that preserve the rural character of the landscape, that are compatible with the dominant rural agricultural land use pattern, and that promote opportunities for the expansion of the County's rural economic as well as environmental goals (Revised General Plan, Chapter 7, Rural Economy Policies, Policy 1). The Plan identifies private camps and parks as an appropriate use in the Rural Policy Area (Revised General Plan,

Chapter 7, Land Use Pattern and Design Strategy Policies, Policy 6). The Plan also outlines a series of performance standards that all rural business uses should meet in order to ensure that the scale and intensity of the use is compatible with the rural character of the area (Revised General Plan, Chapter 7, Land Use Pattern and Design Strategy Policies, Policy 6). The Plan specifically identifies traffic capacity limits, site design standards (i.e. buffering, use intensity, siting, architectural features) and threats to public health, safety and welfare as performance standards which must be evaluated when reviewing applications within the Rural Policy Area (Revised General Plan, Chapter 7, Land Use Pattern and Design Strategy Policies, Policy 6).

The general use of the subject property as a regional park is consistent with the land use and rural economic policies of the Revised General Plan. In the first referral, staff had requested detailed information pertaining to the number of daily visitors, campers and the types of activities being proposed on the subject property so that the scale and intensity of the uses and their potential impact on the surrounding area and road network could be further evaluated.

Boat launch and Concessions/Boat Rental Facility

The proposed boat launch and concessions/boat rental facility as outlined in the applicant's original statement of justification would provide kayak and canoes rentals on a seasonal basis. The concession/boat rental facility would be located adjacent to the proposed boat launch and would be less than 840 square feet in size, which is permitted by-right in the floodplain per the Zoning Ordinance. The Revised General Plan specifically identifies "swimming and boating (non-powered)(where specific points of entry have been identified)" as a permitted active recreational use within the County's rivers and streams (Revised General Plan, Chapter 5, River and Stream Corridor Resources Policies, Policy 18i). However, the applicant's response to first referrals state that a small percentage of patrons to the park may be launching their own motorized fishing boats. The use of motorized boats on the County's rivers and stream is not supported by Plan policies.

Staff recommends that a condition of approval be developed to prohibit the launching of motorized boats from the subject property in conformance with Plan policies.

Campground and Facilities

The applicant is applying for a Level II campground as defined by the Loudoun County Zoning Ordinance, which permits up to 100 campsites and 16,000 square feet of related structures. The applicant envisions "approximately 60 individual campsites, 10 cabins and several group camping areas", in addition the applicant may be providing accommodations for RV and travel trailer camping as implied by their response to first referral comments to the Office of Transportation Services (OTS). The performance standards of the Plan do not support Recreation Vehicles (RV) and/or large travel trailer camping on the subject property due to safety concerns and access constraints associated with the existing road network, noise associated with generators and the

requirements for waste pump out facilities often required for these types of self-contained camping vehicles. Additionally the proposed cabins which are to be located west of Hibler Road (Route 656) should be scaled and sited to maintain a coherent relationship to each other and the surrounding landscape. The overall layout and design of the proposed campgrounds, cabins and associated restroom facilities should respect and preserve the rural character and scenic quality of the subject property.

Staff recommends that a condition of approval be developed to prohibit Recreation Vehicles (RV) and/or large travel trailer camping on the subject property because of safety and access constraints associated with the existing road network and the infrastructure demands associated with these types of self contained camping vehicles which are not in conformance with the performance standards of the Plan.

Staff recommends that the overall layout and design of the proposed campgrounds, cabins and associated restroom facilities be scaled and sited to respect and preserve the rural character and scenic quality of the subject property.

B. HISTORIC RESOURCES

The County has developed specific policy for the protection and preservation of historic resources. The policy outlines the County's commitment to protecting structures and other features of particular historical significance in the context of their natural settings while working with landowners to convey the historic value of the resource to the community at large (Revised General Plan, Chapter 5, Historic and Archaeological Resources, Policy 8). The policy actively promotes the retention and adaptive re-use of historic structures as part of any new development application (Revised General Plan, Chapter 5, Historic and Archaeological Resources, Policy 9).

The historic Lloyd Fry House (also identified as the Colonel White House) and farm complex (VDHR 053-0012-0082) is comprised of buildings dating from the nineteenth and twentieth-century, some of which are associated with the Civil War history of the subject property. The applicant is planning to use the house as a residence for employees and the farm complex as a maintenance facility for the park initially and later rehabilitate the house as an interpretative center for the regional park. In the first referral, staff recommended that the applicant develop a rehabilitation plan for the house and farm complex, as well as a stabilization and mothballing plan for those historically significant buildings not being initially utilized. The applicant has outlined the goals and objectives of the Northern Virginia Regional Park Authority (NVRPA) and their commitment to the preservation of natural and historic resources on the subject site, but has not provided any specific commitments. The applicant states that the "house and associated farm buildings are outside of the area and scope of the special exception" and "does not feel that a cultural resource management plan for the proposed park is necessary". While staff recognizes NVPRAs commitment to preservation, there are no

assurances that the existing buildings will be properly stabilized, mothballed and maintained for future use within the park.

The Lloyd Fry House (also identified as the Colonel White House) and farm complex (VDHR 053-0012-0082) are an important historic feature of the subject property and should be properly stabilized, mothballed and maintained for future use within the park in compliance with Plan policies. Staff recommends that the applicant commit to the protection, preservation and rehabilitation of these historic buildings as part of the development of a cultural resource management plan for the subject property.

RECOMMENDATIONS

Staff finds that the proposed use of the subject property as a regional park is consistent with the land use and rural economic policies of the Revised General Plan. However, staff has identified several issues relating to compatibility and the preservation of historic resources that require additional information and commitments from the applicant to ensure that proposed application complies with Plan policies.

Staff recommends the applicant commit to the following:

- Prohibition of the launching of motorized boats in conformance with Plan policies.
- Long-term maintenance and care of the vegetated landscape buffers on the perimeter of the subject property;
- Prohibition of Recreation Vehicles (RV) and/or large travel trailer camping on the subject property; and,
- Protection, preservation and rehabilitation of the Lloyd Fry House (also identified as the Colonel White House) and farm complex (VDHR 053-0012-0082) on the subject property and the development of a cultural resource management plan for the proposed park.

Staff recommends the following site design changes:

- Layout and design the proposed campgrounds, cabins and associated restroom facilities to respect and preserve the rural character and scenic quality of the subject property.

Staff finds that the application for a Commission Permit (CMPT) to establish a public park on the subject site is consistent with the land use and rural economic policies of the Revised General Plan. In addition the Capital Needs Assessment (CNA) for the western subareas of the County demonstrate a deficiency in regional and district parks; the proposed park on the subject property would assist the County in providing citizens with access to need open space and recreational amenities. Staff finds the general location and use of the subject property as a public park is consistent with the Revised General Plan and recommends approval of the Commission Permit.

Staff in reviewing the Special Exception requests has identified several issues that require additional information and commitments from the applicant to assure conformance with the performance standards and policies of the Revised General Plan. Staff cannot recommend approval of the Special Exception requests at this time.

Staff would be happy to meet with the applicant to discuss any comments or questions.

cc: Julie Pastor, AICP, Director, Planning
Cindy Keegan, AICP, Program Manager, Community Planning-via email

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County of Loudoun
Department of Planning
MEMORANDUM

DATE: July 13, 2009
TO: Nicole Steele, Project Manager, Land Use Review
FROM: Pat Giglio, Planner, Community Planning
SUBJECT: **SPEX 2008-0061, SPEX 2008-0062 & CMPT 2008-0020**
White's Ford Park

BACKGROUND

The applicant, Northern Virginia Regional Park Authority (NVRPA) is requesting a pair of Special Exceptions (SPEXs) and a Commission Permit (CMPT) for the establishment of a public park on a property with Potomac River frontage approximately 6 miles northeast of the Town of Leesburg and 2 ½ miles southeast of Lucketts. The 275-acre subject property is bisected by Hibler Road (Route 656), 1.0 mile east of the intersection of Limestone School Road (Route 661), at 43552 Hibler Road. The proposed regional park would be programmed for passive recreational uses and will feature hiking trails, equestrian trails, camping and cabin facilities, picnic pavilions, and a boat ramp with concessions. The proposed park will be served by an on-site well and drainfields.

The subject property is zoned AR-1 (Agriculture Rural-1) and is governed under the provisions of the Revised 1993 Zoning Ordinance. Many of the proposed passive uses are permitted by-right within the zoning district, however the proposed camping facilities require a Minor Special Exception and the boat ramp requires a Special Exception within the zoning district. A Commission Permit is also required for all public facilities to determine if the general location, character, and extent of the use is in substantial accord with the Comprehensive Plan. The proposed park is not shown as a public facility site on the Public Facilities Map (Revised General Plan, Chapter 3, Public Facilities Map); therefore, a Commission Permit is required.

The majority of the subject property is open grass-covered pasture used for cattle grazing, with some small wooded areas along drainages and fence lines and around the historic farm complex located near the center of the property north of Hibler Road. A review of County GIS identified a small unnamed tributary, wetlands, floodplain, steep slopes and forest cover on the subject property. A Phase I Archaeological Survey identified several prehistoric and historic sites on the subject property. All the existing nineteenth and twentieth-century houses and farm buildings on the subject property

the North Virginia Regional Park Authority (NVRPA) and others in the acquisition of land and the development of facilities such as the Potomac Heritage Trail", which will bisect the property in the future as the trail is developed (Revised General Plan, Chapter 3, Parks, Recreation, and Community Services Policies, Policy 4 and Chapter 5, Scenic Rivers and Potomac River Policies, Policy 8).

Staff finds that the proposed use of the subject property for a regional park is consistent with the planned land use and is supported by the rural policies of the Revised General Plan.

Issues pertaining to impacts to environmental features, compatibility and traffic are discussed below.

B. EXISTING CONDITIONS

The Green Infrastructure is a collection of natural, cultural, heritage, environmental, protected, passive and active resources that will be integrated in a related system. It includes stream corridors, vegetative landscapes, wildlife and endangered species habitats, and heritage resources (Revised General Plan, Chapter 5, Green Infrastructure Policies, Policy 1). Development should take place around these elements, incorporating them into the design of the site. Such an approach places a priority on preserving both sensitive environmental and man-made features.

Elements of the Countywide Green Infrastructure can be found on the subject site, including a small unnamed tributary, wetlands, floodplain, steep slopes and forest cover. Based on the submitted Special Exception Plat and Concept Sketch Plan, which feature bubble diagrams, it appears that the applicant has attempted to design and located the proposed park infrastructure and facilities (i.e. roads, camping areas, picnic pavilions, playground areas, restrooms etc.) within the existing open fields to minimize impacts on existing environmental features. Detailed Plan guidance on the treatment of individual Green Infrastructure elements is outlined in the following sections.

1. River and Stream Corridor Resources

The subject site contains river and stream corridor resources as defined by the Revised General Plan. The Potomac River forms the southern boundary of the subject property and its floodplain extends across the entire property south of Hibler Road. Staff notes preservation and protection of the scenic character and quality of the shoreline of the Potomac River is a County priority (Revised General Plan, Chapter 5, Scenic Rivers and Potomac River, text).

The Potomac River, adjoining floodplains, and adjacent steep slopes (slopes 25% or greater) within 50 feet of streams and floodplains, extending no farther than 100 feet beyond the originating stream or floodplain; along with the 50-foot management buffer surrounding the adjacent steep slopes, as called for in the Revised General Plan together constitute the river and stream corridor resource (Revised General Plan, Chapter 5, River and Stream Corridor Resources Policies, Policy 2). The Plan's intent

tree conservation areas (TCAs) on the proposed Special Exception Plat. Staff recommends commitment to the long-term maintenance of the tree conservation areas (TCAs).

3. Plant and Wildlife Habitats

The Plan states that "the County will use the Virginia Department of Conservation and Recreation, Division of Natural Heritage's Biological and Conservation Data system to identify Loudoun County's natural heritage resources. These resources include rare, threatened and endangered plant and animal species; exemplary natural communities, habitats, and ecosystems; and other natural features of the County. The County will apply this information in the evaluation of development proposals. For those development applications that have a likely presence of one or more natural heritage resources, the County will require the applicant to conduct a species assessment and develop a plan for impact avoidance in cases where the presence of the species is identified" (*Revised General Plan, Chapter 5, Plant and Wildlife Habitats Policies, Policy 8*). The Virginia Department of Conservation and Recreation (DCR) letter dated March 26, 2009 did not "indicate the presence of any State Natural Area Preserves" on the subject property and that the "current activity will not affect any documented state-listed plants or insects.

Staff concurs with the Virginia Department of Conservation and Recreation's (DCR's) review and findings.

4. Lighting

The Plan promotes sound night-lighting standards that will "reduce light pollution such as glare, energy waste, light trespass, and the deterioration of the natural nighttime environment" (*Revised General Plan, Chapter 5, Lighting and Night Sky, Policy 1*). The applicant states that "all lighting for the campgrounds and boat ramp will be designed to minimize glare on adjacent uses" (*White's Ford Park, Statement of Justification, Issues for Consideration, Issue D*). The applicant should commit to conditions that provide assurances that the proposed lighting will be the minimum intensity of lighting necessary for the operation of the proposed uses and that the lighting will be shielded and directed downward to reduce glare and spillage of light onto adjoining properties and into the night sky.

Staff recommends that the applicant commit to providing site lighting which is the minimum intensity of lighting necessary for the operation of the proposed uses within the park. The proposed site lighting should be shielded and directed downward to reduce glare and spillage of light onto adjoining properties and the night sky.

5. Historic and Archaeological Resources

Plan policies recommend that "an archaeological and historical resources survey be submitted as part of all land development applications" (*Revised General Plan, Chapter 5, Historic and Archaeological Resources Policies, Policy 11*). A Phase I archaeological

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applications will be evaluated against these Guidelines (Heritage Preservation Plan, Chapter 9, Historic Standing Structures and Their Setting Polices, Policy 9). Additionally the applicant should consider the design and siting of the proposed cabins, restroom facilities, picnic pavilions, boat concessions, etc. to ensure that they blend with the existing historic buildings and rural agricultural character of the site.

Based on staff's review of the survey reports, further consultation with the applicant and the County Staff is recommended to develop a cultural resource management plan for the property to avoid impacts to archaeological sites, ensure preservation of existing historic structure, and to site and design new structures so that they blend with the existing historic buildings and rural agricultural character of the property .

C. COMPATIBILITY

The Plan policies support the development of rural businesses that are compatible in scale, use and intensity with the rural environment. The proposed regional park, like other rural business uses, must meet established performance criteria, including traffic capacity limits, site design standards (i.e. buffering, use intensity, siting, architectural features) and pose no threat to public health, safety and welfare" (Revised General Plan, Chapter 7, Land Use Pattern and Design Strategy Policies, Policy 6).

The proposed regional park would be programmed for passive recreational uses and will feature hiking trails, equestrian trails, camping and cabin facilities, picnic pavilions, and a boat ramp with concessions. The Statement of Justification does not provide any details pertaining to the anticipated scale and intensity of use of the park; however the Traffic Impact Analysis does provide some indication of the anticipated trip generation on a weekly basis. Staff requests the applicant provide more detailed information pertaining to the number of daily visitors, campers and the types of activities being proposed on the subject property, so that the scale and intensity of use and its potential impact on the surrounding area can be evaluated.

Staff finds that the proposed use of the subject property as a regional park is consistent with the land use and rural economic policies of the Revised General Plan. However additional consideration of the scale and intensity of the use, in particular the anticipated number of visitors and types of activities, should be provided and will be evaluated to determine their impacts and overall compatibility with the surrounding rural area.

D. TRAFFIC

The proposed regional park will be accessed via Hibler Road (Route 656), a rural state maintained gravel road. The establishment of the proposed regional park on the subject property will increase the daily non-peak vehicular trips to the site, however based on the submitted traffic statement there appears to be a "minimal traffic impact" within the study area (White's Ford Park, Traffic Impact Analysis, p.19). Additionally it appears

COUNTY OF LOUDOUN
DEPARTMENT OF BUILDING AND DEVELOPMENT
ZONING REFERRAL



DATE: August 18, 2009

TO: Nicole Steele, Project Manager, Department of Planning

FROM: Teresa H. Miller, Planner, Zoning Administration *(THM)*

CC: Marilee Seigfried, Deputy Zoning Administrator

CASE NUMBER AND NAME: SPEX-2008-0061 White's Ford Park 2nd submission
SPEX-2008-0062
CMPT-2008-0020

TAX/MAP PARCEL NUMBER: /31/////////5/

MCPI: 077-36-5320

Zoning Administration has reviewed the second submission materials for the above referenced **Special Exception (SPEX)** and **Commission Permit (CMPT)** applications for conformance to the Revised 1993 Loudoun County Zoning Ordinance and has the following comments.

I. Critical Issues
None

II. Special Exception

1. SPEX-2008-0061 is an applicable for special exception to permit boat rentals and incidental structure (boat launch) associated with that use. The SPEX plat needs to be updated to list the use as permitted in Section 4-1500 of the zoning ordinance.
2. In addition to Section 6-1300, Section 4-1507(A) through (G) will need to be addressed as part of the Statement of Justification for the use located in the floodplain.

III. Commission Permit

1. Per Checklist Item C, a site plan should be submitted with the application for commission permit to establish the park use. On this plan, all park amenities need to be shown. The applicant has indicated a residual lot of approximately 20 acres will be created along the eastern portion of the property. The Concept Sketch included with the application shows a portion of the hiking/equestrian trail to be located on this residual lot. This residual lot will need to be shown within the limits of the commission permit or the trail will need to be relocated to be within the park limits.

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COUNTY OF LOUDOUN
DEPARTMENT OF BUILDING AND DEVELOPMENT
ZONING REFERRAL



DATE: March 20, 2009

TO: Nicole Steele, Project Manager, Department of Planning

FROM: Teresa H. Miller, Planner, Zoning Administration *THM*

THROUGH: Marilee Seigfried, Deputy Zoning Administrator *MS*

CASE NUMBER AND NAME: SPEX-2008-0061 White's Ford Park
SPEX-2008-0062
CMPT-2008-0020

TAX/MAP PARCEL NUMBER: /31/////////5/

MCPI: 077-36-5320

Zoning Administration has reviewed the above referenced **Special Exception (SPEX)** and **Commission Permit (CMPT)** applications for conformance to the Revised 1993 Loudoun County Zoning Ordinance and has the following comments.

I. Critical Issues

1. The parcel is within an Open Space Easement (200712060084868 OSE) granted to the Virginia Outdoors Foundation. The Virginia Outdoor Foundation will need to review the submitted application to ensure compliance with the regulations of this easement.
2. All uses/structures associated with the campground need to be shown on the special exception plat for the minor special exception, including any required service buildings. The illustration title "Concept Sketch" dated 8/1/08 revised 11/24/08, shows several restrooms/showers, which would typically be uses associated with a campground. It would appear the park office would be used for registration of incoming campers. If associated with the campground, these structures will need to be located outside of the 250' campground setback. Include any maintenance buildings, playground areas, picnic pavilions, etc.
3. The square footage of all structures located within the major floodplain will need to be given. Should any of these structures, including picnic pavilions, located in the floodplain be larger than 840 square feet, a special exception per Section 4-1506(F) will be required.

II. Special Exception Plat

1. For both the campground and boat launch, any overlays not related to the application should be removed from the plat, such as the approved drain field locations. Any setbacks associated with the campground use should not be shown on the boat launch special exception plat.
2. As the limits of the major floodplain along the Potomac River extend beyond the scenic creek valley buffer setback, the scenic creek valley buffer does not apply. Please remove the label.
3. Section 5-646(E)(3)(b) allows a campground no more than 2 points of access to a public road, not including access points for emergency vehicles only. The special exception plat is showing 4 points of access to Hibler Road.
4. A portion of the road adjacent to the yurt/cabin area for the campground extends beyond the 250' campground setback.
5. Under zoning requirements, the campground is listed as a Level II medium scale. It would appear the correct level should be Level III, Large Scale.
6. Address the location of parking areas associated with the campground use and label on the plat.
7. The parcel contains areas of very steep and moderately steep slopes. The eastern most entrance on the north side of Hibler Road will be located in close proximity to the very steep and moderately steep slopes. Ensure the road/driveway can meet the requirements of Section 5-1508(E)(4).

III. Other Comments

1. The sheet titled Concept Sketch shows two event areas, a future equestrian facility and the Colonel White House interpretive area. Should any of these uses be associated with the campground, they will need to be shown on the special exception.
2. Please see the attached ERT referral for additional comments.

DEPARTMENT OF BUILDING AND DEVELOPMENT

COUNTY OF LOUDOUN

MEMORANDUM

DATE: August 14, 2009

TO: Nicole Steele, Project Manager, Department of Planning

FROM: Michael Clem, Environmental Review Team

THROUGH: William Marsh, Environmental Review Team Leader *WM*

CC: Teresa Miller, Zoning Administrator
Pat Giglio, Community Planner

SUBJECT: SPEX-2008-0061, SPEX-2008-0062 & CMPT 2008-0020 White's Ford Park

1. The proposed boat ramp location crosses an area of very steep slopes along the bank of the Potomac. Zoning Ordinance (ZO) Section 5-1508(D) does not allow disturbance in areas where the very steep slopes are greater than 5,000 contiguous square feet. The area in which the proposed ramp is located on the submitted plat is greater than 8,000 contiguous square feet and continues to the west along the entire length of the property floodplain. To the east of the proposed boat launch area there are several small areas of moderately steep slope and one area of over 5200 contiguous square feet of very steep slope. Only passive recreation is allowed in very steep slopes, such as trails for non-motorized vehicles. A trail for launching non-motorized boats could conform to this allowed use.
2. Staff requests that the applicant provide the County with digital data depicting the Corps-approved wetland delineation (including jurisdictional wetlands and waters). Loudoun County's GIS uses ESRI software and can import .DXF data. Our coordinate system is Virginia State Plane. Datum NAD 83 data is preferable if available. Documentation on the digital data (e.g., map scale, age, etc) would be helpful.
3. Staff commends the applicant for the efforts made to avoid impacts to important archaeological and cultural resources.
4. Staff requests that the applicant commit to a condition of approval to develop a management plan for controlling and removing invasive and less desirable species of trees and vegetation from existing fencerows, and to promote the natural re-growth of desirable species in open areas while controlling and eliminating invasive trees.

Including forest and tree conservation measures within the project is consistent with Forest, Trees and Vegetation Policies on Page 5-32 of the RGP.

5. In evaluating the effect of the proposed special exception on water quality as required by Section 6-1310.H of the Revised 1993 Zoning Ordinance, staff notes that there are no proposed stormwater management facilities serving the property. To ensure that impervious surface areas are minimized, steep slopes are not eroded by stormwater runoff, and available areas of permeable soil are used for infiltration, staff recommends further discussion with the applicant regarding a stormwater pollution prevention plan for the proposed uses. Further, staff desires an agreement with the applicant on the scope of said plan prior to consideration by the planning commission.
6. Staff applauds the applicant's past efforts and successes in sustainable building design, water conservation measures, and other environmentally friendly actions. Staff recommends that the applicant commit to a sustainable building design of the proposed buildings within the park site, with a focus on conservation of energy and water, and indoor air quality, among other goals. The Revised General Plan encourages these goals in the General Water Policies supporting long-term water conservation (Policy 1, Page 2-20); and the Solid Waste Management Policies supporting waste reduction, reuse, and recycling (Policy 2, Page 2-23).
7. Staff requests a commitment from the applicant to provide the Preliminary Soils Report for the Potomac Floodplain at the first submission of the site plan for this project.
8. It has come to staff's attention that the park site may be open for recreational vehicle use. Staff recommends a condition of approval that noise generating activities, such as generators, motorboats, and other similar machinery is limited from dawn to dusk to protect the rural character of the area and to decrease the likelihood of disturbance to present and future neighboring residences. This recommendation is meant to address noise requirements in ZO section 5-1507.

DEPARTMENT OF BUILDING AND DEVELOPMENT
COUNTY OF LOUDOUN
MEMORANDUM



DATE: March 18, 2009

TO: Teresa Miller, Zoning Administrator

FROM: Michael Clem, Environmental Review Team

THROUGH: William Marsh, Environmental Review Team Leader  

CC: Nicole Steele, Project Manager, Department of Planning

SUBJECT: SPEX-2008-0061, SPEX-2008-0062 & CMPT 2008-0020 White's Ford Park

The Environmental Review Team (ERT) reviewed the subject application during the March 16, 2009, ERT Meeting. Our comments pertaining to the current application are as follows:

Comments related to the Zoning Ordinance (ZO)

Regarding steep slopes

1. The proposed boat ramp location crosses an area of very steep slopes along the bank of the Potomac. Staff recommends relocating the ramp to an area to the east that will not impact very steep slopes, consistent with ZO Section 5-1508(D).

Comments related to the Revised General Plan (RGP)

2. The proposed entrance on the eastern portion of the property north of Hibler road may impact very steep slopes, minor floodplain, and wetlands if widened beyond its current footprint. Due to these significant impacts staff recommends abandoning this proposed access point and utilizing this existing driveway as a secondary or emergency means of gaining access to the property. Please refer to the RGP Pages 5-26 (Steep Slope and Moderately Steep Slope Policies), and 5-6 (River and Stream Corridor Resources Policies). Also refer to the Loudoun County Revised Zoning Ordinance (ZO), Section 5-646, E. 3.

Regarding wetlands

3. A Wetland Delineation of the portion of the property north of Hibler Road has been prepared by Bowman Consulting and was submitted with this application. No such study has been provided for the Potomac floodplain portion of the property, Since the Loudoun County Predictive Wetland Model identifies potential wetlands within both segments of the property, staff recommends clarification of whether a wetland delineation has been conducted for the Potomac floodplain portion of the property and whether a Jurisdictional Determination has been issued by the U.S. Army Corps of Engineers (Corps). The jurisdictional determination is needed with this application to demonstrate compliance with the avoidance and minimization criteria required by Section 404 of the Clean Water Act and Section 9VAC25-210-115A of the Virginia Water Protection Permit Regulations. The jurisdictional determination is also needed to evaluate conformity with Policy 23 on Page 5-11 of the Revised General Plan (RGP) which states that "the County will support the federal goal of no net loss to wetlands in the County."

If Federal permits are required from the Army Corps of Engineers because of potential impacts to wetlands, the project may be subject to Section 106 of the National Historic Preservation Act and impact mitigation for all register eligible archaeological sites or structures may be required through the Virginia Department of Historic Resources (VDHR). Staff will be happy to work with the applicant and the VDHR (if necessary) throughout this process.

Regarding tree preservation, enhancement

4. The proposed park layout avoids the majority of the existing fencerows located on the site. Staff believes that this approach helps to maintain the rural character of this area as well as provide buffering to help separate the various components of the park. However, significant areas of the fencerows have invasive and less desirable species such as Ailanthus and black locust. Staff would support the systematic removal of Ailanthus and black locust with the subsequent replacement of native deciduous mixed hardwood as noted on sheet 5 of the submitted plans. Staff recommends that the culling, stump treatment and replanting process be done incrementally. Staff also recommends that in areas where improvements are proposed adjacent to fencerows that the applicant engages an arborist to certify that trees in proximity of the improvements do not impose a safety hazard.
5. Staff recommends contacting the Virginia Department of Forestry (DOF) concerning the possibility of reforestation within the 250 foot campground setback and elsewhere on the property. The DOF will provide guidance and other assistance for plantings in these areas. Areas designated as archaeological sites within the Potomac floodplain however should be avoided as tree plantings in the areas may prove detrimental to the site integrity. Including forest and tree conservation measures within the project is consistent with Forest, Trees and Vegetation Policies on Page 5-32 of the RGP.

Regarding water quality, conservation

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6. The Surface Water Policies within the RGP support the implementation of low impact development (LID) techniques (Page 5-17). Substantial portions of the property consist of soils that are moderately well to well drained. It is unclear from the plans what areas, including roadways, campsites, parking, and structures, will be impervious. Much of the upland portion of the property drains into an area consisting of very steep slopes, a farm pond, wetlands, and minor floodplain. Where impervious surfaces are needed, staff recommends incorporating infiltration measures for runoff.
7. Staff encourages installation of water conservation measures into the project, such as low flow and waterless urinals in proposed restrooms. Including water conservation measures within the project is consistent with General Water Policies on Page 2-20 of the RGP.

Regarding soils, archaeology, and green building

8. A Preliminary Soils Report was conducted for the upland (north of Hibler Road) portion of the property. Staff recommends conducting the same for the Potomac floodplain portion as well, in order to update County records concerning Prime Agricultural Soils as discussed in the RGP Page 5-24 (Prime Agricultural Soil Policies) and the Facilities Standards Manual (FSM) Section 6.130.
9. Staff recommends avoiding impacts to two areas of archaeological importance described in the following text. These sites are:
 - a. 44LD0365
 - b. 44LDA (temporary site number within WSSI report)

Staff notes that site 44LD0365, which is to be avoided in compliance with a Virginia Outdoor Foundation (VOF) No-Build Area, has been misidentified on the Virginia Department of Historic Resources maps and therefore is misidentified on the submitted plans. Thunderbird Archaeology has indicated that the site should be mapped on a terrace some 200-400 feet closer to the Potomac. Consequently the site is in an area designated to be a Park camp area. Staff recommends avoiding impacts to the site. Staff also notes that Thunderbird identified a new site (44LDA) along a terrace on the southwestern portion of the Potomac Floodplain. This site is a Late Woodland Village site. Surface collection has identified this as an extensive site that is quite shallow within the soil profile. This is also an area designated for camping. Staff recommends avoiding impacts to this site as well, either through avoidance or by minimizing subsurface disturbance. It is unclear from the current proposed plans what the impacts would consist of during the construction of camping spaces, parking areas, roadways, etc. Staff understands that additional archaeological work is planned for this site to further delineate the site both horizontally and vertically. It is unclear if this site will be subject to the VOF No-Build Area designation as well. The Policies regarding Historic and Archaeological Resources within the RGP, Page 5-35, discuss the County's interest in "the protection of these sites during the development process."

10. Staff supports a built design with this application that helps to sustain the natural environment, consistent with Revised General Plan (RGP) language on page 5-2. Staff also commends the Northern Virginia Regional Parks Authority for registering the Temple Hall Farm Visitor Center for Leadership in Energy and Environmental Design (LEED) Certification. Accordingly, staff recommends that the applicant implement design measures that conserve energy and water consumption, minimize waste generated during construction, and maintain interior and exterior air quality. RGP policies supporting these design measures include policy one, page 2-20; policy two, page 2-23; policy one, page 5-5; and policy one, page 5-41.

Several design approaches are available to achieve these goals, including LEED as administered by the United States Green Building Council; and Energy Star and Water Sense programs administered by the Environmental Protection Agency. The Board of Supervisors has endorsed LEED as the preferred green building rating system for non-residential construction through its support of the COG Regional Green Standard, available at <http://mwcog.org/environment/greenbuilding/>. Loudoun County also participates with the Energy Star program and uses the Energy Star Portfolio Manager to benchmark energy efficiency for public facilities. Staff recommends incorporation of these design approaches and is available to discuss design options with the applicant, thereby meeting its role as "leader and facilitator" for achieving and sustaining a built environment of high quality, as directed by RGP policy one, page 5-5.

Due to the scope of the comments provided, staff requests an opportunity to review the subsequent submission of this application. Please contact me if you need any additional information.

L. Preston Bryant, Jr.
Secretary of Natural Resources



Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

217 Governor Street
Richmond, Virginia 23219-2010
(804) 786-7951 FAX (804) 371-2674

March 26, 2009

Nicole Steele
County of Loudoun
1 Harrison Street S.E.
Leesburg, VA 20175

Re: SPEX 2008-0061, SPEX 2008-0062 & CMPT 2008-0020- White's Ford Park Waiver

Dear Ms. Steele:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to Dr. Steve Roble, DCR zoologist, potential exists for the Wisconsin snaketail (*Ophiogomphus susbehcha*, G1G2/S1S2/NL/NL) to occur along the Potomac River shoreline. Adult Odonata (dragonflies and damselflies), commonly seen flitting and hovering along the shores of most freshwater habitats, are accomplished predators. Adults typically forage in clearings with scattered trees and shrubs near the parent river. They feed on mosquitoes and other smaller flying insects, and are thus considered highly beneficial. Odonates lay their eggs on emergent vegetation or debris at the water's edge. Unlike the adults, the larvae have an aquatic larval stage where they typically inhabit the sand and gravel of riffle areas. Wingless and possessing gills, they crawl about the submerged leaf litter and debris stalking their insect prey. The larvae seize unsuspecting prey with a long, hinged "grasper" that folds neatly under their chin. When larval development is complete, the aquatic larvae crawl from the water to the bank, climb up the stalk of the shoreline vegetation, and the winged adult emerges (Hoffman 1991; Thorpe and Covich 1991). Because of their aquatic lifestyle and limited mobility, the larvae are particularly vulnerable to shoreline disturbances that cause the loss of shoreline vegetation and siltation. They are also sensitive to alterations that result in poor water quality, aquatic substrate changes, and thermal fluctuations.

Due to the potential for this site to support populations of natural heritage resources, DCR recommends an inventory for the resource in the study area from late April to mid-May. With the survey results we can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources.

DCR-Division of Natural Heritage biologists are qualified and available to conduct inventories for rare, threatened, and endangered species. Please contact J. Christopher Ludwig, Natural Heritage Inventory

Manager, at chris.ludwig@dcr.virginia.gov or 804-371-6206 to discuss arrangements for field work. A list of other individuals who are qualified to conduct inventories may be obtained from the USFWS.

In addition, to minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR also recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations.

Our files do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

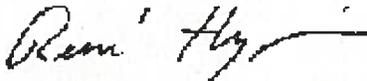
Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Shirl Dressler at (804) 367-6913.

Should you have any questions or concerns, feel free to contact me at 804-371-2708. Thank you for the opportunity to comment on this project.

Sincerely,



S. Rene' Hypes
Project Review Coordinator

Literature Cited

Hoffman, R. 1991. Arthropods. Pp. 173 in: K. Terwilliger (ed.), Virginia's Endangered Species: proceedings of a symposium. The McDonald and Woodward Publishing Company, Blacksburg, VA.

Thorpe, J.H., and A.P. Covich. 1991. Ecology and Classification of North American Freshwater Invertebrates. Academic Press, Inc., San, Diego, California.

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L. Preston Bryant, Jr.
Secretary of Natural Resources



Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

Division of Natural Heritage
217 Governor Street
Richmond, Virginia 23219-2010
(804) 786-7951 FAX (804) 371-2674

May 11, 2009

Kate Rudacille
Northern Virginia Regional Park Authority
5400 Ox Road
Fairfax Station, VA 22039



Re: Whites Ford Park

Dear Kate,

Thank you for the opportunity to survey for the globally rare Wisconsin Snaketail dragonfly (*Ophiogomphus susbehcha*) at the proposed Whites Ford Park property along the Potomac River northeast of Leesburg in Loudoun County. During my visit on May 1, 2009, I surveyed for this species along nearly the entire length (about 0.6 miles) of the river shoreline (except for a few very steep sections) that is contained within the property boundary. Although weather conditions during most of the day were not favorable for adult dragonfly activity, the shoreline was surveyed rather thoroughly for the presence of dragonfly exuviae (shed larval skins). This has proven to be an effective survey method for documenting the distribution of the Wisconsin Snaketail dragonfly along the James River in Virginia. No evidence of the Wisconsin Snaketail was found at the Whites Ford Park property, although the habitat may be suitable. This species has been documented only once (2002) from the Potomac River, at a site several miles farther upstream.

Recent floodwaters may have displaced dragonfly exuviae (from the spring 2009 emergence) that were formerly present on and near the shoreline, but I found little to no evidence of exuviae in flood debris or higher up the bank. In general, the number of exuviae present along this stretch of the Potomac River was very low. I found a total of only 9 exuviae and 1 live nymph (which had recently crawled out of the river and later emerged as an adult within the next hour) of a common dragonfly, the Ashy Clubtail (*Gomphus lividus*), during the survey. When the skies cleared later in the afternoon, I captured adults of two additional dragonfly species, Springtime Darner (*Basiaeschna janata*) and Spine-crowned Clubtail (*Gomphus abbreviatus*), at the southern edge of the fallow fields bordering the riparian forest. The latter species was represented by one fresh adult female, which had likely emerged from the river within the

*State Parks • Soil and Water Conservation • Natural Heritage • Outdoor Recreation Planning
Chesapeake Bay Local Assistance • Dam Safety and Floodplain Management • Land Conservation*

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Re: Whites Ford Park

previous 24 hours. Due to the discovery of several new populations of the Spine-crowned Clubtail in Virginia in 2008, this species was recently removed from the Virginia Department of Conservation and Recreation's rare animal list and placed on our informal watchlist. However, the Spine-crowned Clubtail is still considered to be very rare in Maryland. The adult found at Whites Ford Park is only the fourth known record for this species from the Potomac River. The capture location is marked on the enclosed map.

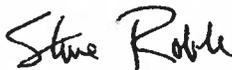
In my professional opinion, the proposed boat ramp is not likely to impact the habitat of any rare dragonflies, particularly if it is not used by large motorized boats that are capable of creating significant wakes which can potentially impact emerging adults. It appears that the shallow depths of this section of the river will preclude such large boats. Maintaining the narrow strip of riparian forest within the park to the fullest extent possible is recommended. Among various other species, Prothonotary Warblers were particularly common in this habitat. Garlic mustard, an invasive, exotic plant, was also extremely abundant in the riparian strip and has displaced native spring wildflowers such as Virginia bluebells and violets; very few stems of either of these species were noted. Consideration should be given to controlling the continued spread of this species on the park property.

The attached species list is a summary of the fauna that I recorded during my visit. In addition, many mayflies (Ephemeroptera) and caddisflies (Trichoptera) had recently emerged from the river, and stonefly (Plecoptera) exuviae and adults (few) were noted..

Thank you again for the opportunity to survey this property. An invoice in the amount of \$770.00 is enclosed for services rendered.

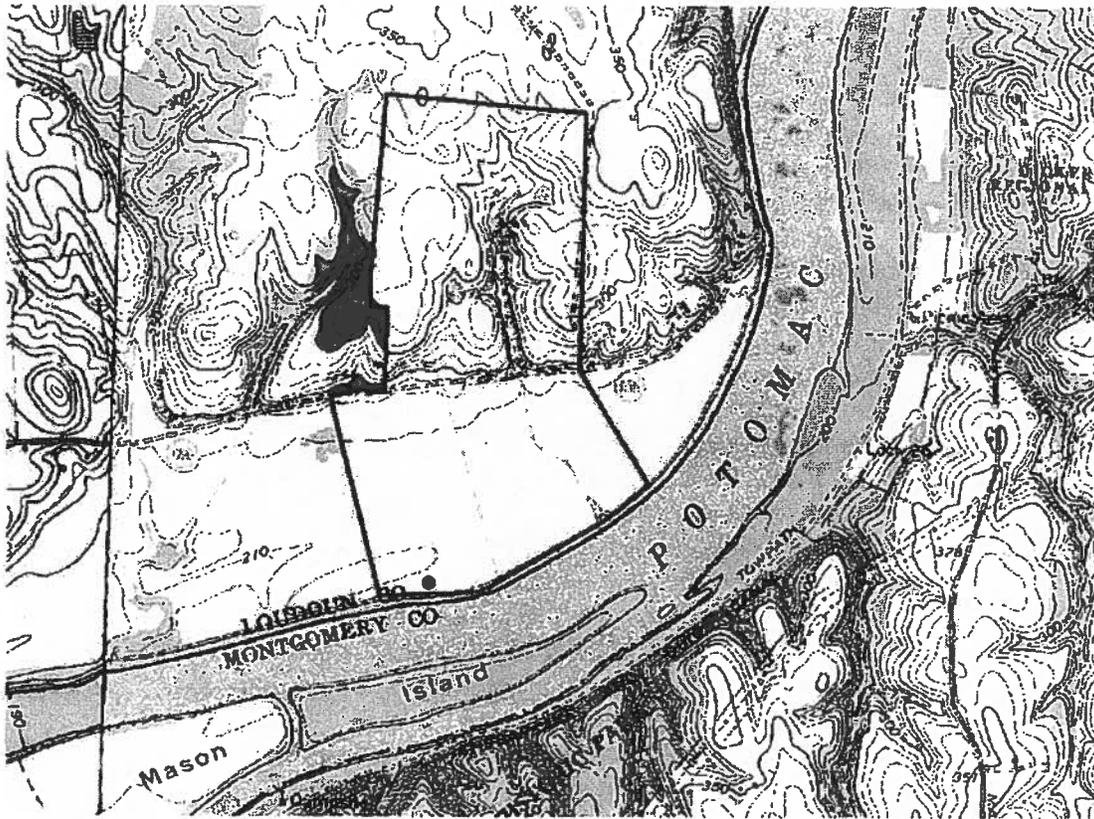
Please do not hesitate to contact me if you have any questions about this survey.

Sincerely,



Steven M. Roble, Ph.D.
Staff Zoologist
804-786-8633
steve.roble@dcr.virginia.gov

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Approximate location (dot) where a teneral adult female Spine-crowned Clubtail (*Gomphus abbreviatus*) was captured on 1 May 2009 at the proposed Whites Ford Park (approximate boundary in purple), Loudoun County, Virginia.

Whites Ford Park, Loudoun County, Virginia
Animal species recorded on May 1, 2009

by

Dr. Steven M. Roble, Staff Zoologist
Virginia Department of Conservation and Recreation
Division of Natural Heritage
217 Governor Street
Richmond, Virginia 23219

Dragonflies (3)

Springtime Darner (*Basiaeschna janata*)
Spine-crowned Clubtail
(*Gomphus abbreviatus*)
Ashy Clubtail (*Gomphus lividus*)

Butterflies (6)

Spicebush Swallowtail
Zebra Swallowtail
Cabbage White
Eastern Tailed-Blue
American Lady
Silver-spotted Skipper

Mussels and clams (3)

Eastern Elliptio (*Elliptio complanata*)
Lampmussel (*Lampsilis* sp.)
Asian Clam (*Corbicula fluminea*)

Amphibians (4)

American Toad
Spring Peeper
Eastern Gray Treefrog
Pickerel Frog

Birds (44)

Double-crested Cormorant
Great Blue Heron
Canada Goose
Wood Duck
Mallard
Black Vulture
Turkey Vulture
Bald Eagle
Red-shouldered Hawk
Red-tailed Hawk

Birds (continued)

Killdeer
Spotted Sandpiper
Mourning Dove
Yellow-billed Cuckoo
Barred Owl
Chimney Swift
Red-bellied Woodpecker
Downy Woodpecker
Great Crested Flycatcher
Eastern Kingbird
Purple Martin
Blue Jay
American Crow
Carolina Chickadee
Tufted Titmouse
White-breasted Nuthatch
Carolina Wren
House Wren
Blue-gray Gnatcatcher
Wood Thrush
Northern Mockingbird
Cedar Waxwing
Warbling Vireo
Prothonotary Warbler
Louisiana Waterthrush
Common Yellowthroat
Northern Cardinal
Indigo Bunting
Field Sparrow
Grasshopper Sparrow
Song Sparrow
Brown-headed Cowbird
Red-winged Blackbird
American Goldfinch

Mammals (3)

Eastern Cottontail
Raccoon
White-tailed Deer

County of Loudoun
Office of Transportation Services

MEMORANDUM

DATE: September 11, 2009
TO: Nicole Steele, Project Manager, Department of Planning
FROM: Marc Lewis-DeGrace, Transportation Planner *MLDG*
SUBJECT: SPEX 2008-0061, SPEX 2008-0062, CMPT 2008-0020
White's Ford Park
(Second Referral)

Background

This referral serves as an update to the status of issues identified in the first OTS referral (dated April 13, 2009) on these applications (two special exceptions (SPEX) and one commission permit (CMPT)), which request approval of a park administered by the Northern Virginia Regional Park Authority (NVRPA).

The site consists of approximately 275 acres and is located both north and south of Hibler Road (Route 656) between Harrison Hill Lane and the Potomac River. The site will have access from Hibler Road, which connects to James Monroe Highway (US Route 15) via Limestone School Road (Route 661) and Spinks Ferry Road (Route 657).

The proposed park land is currently zoned Agricultural Rural – 1 (AR-1). The proposed park will be implemented in two phases, the first will include the installation of a boat launch and camping facilities and will be completed by 2015. The second phase will include equestrian trail facilities that will be completed at a future date not yet determined.

The proposed development does not seek to change the current AR-1 zoning, and “community, neighborhood, or regional park, active recreational uses” are permitted by the Revised 1993 Loudoun County Zoning Ordinance. The boat launch, which will be constructed along the Potomac River and the camping facilities, will each require a special exception.

This update is based on review of materials received from the Department of Planning on August 10, 2009, namely (1) a letter responding to first referral comments, dated July 30, 2009, (2) a revised special exception plat prepared by Christopher Consultants, Ltd.,

dated November 26, 2008 and (3) concept sketch prepared by Christopher Consultants, Ltd., dated August 7, 2008, and revised through June 29, 2009.

Status of Transportation Issues/Comments

Staff comments from the first OTS referral as well as the Applicant's responses (quoted directly from its July 30, 2009 response letter) and current issue status, are provided below.

1. **Initial Staff Comment (1st Referral)**: It is not clear from the traffic study whether the applicant is seeking approval for any Phase II uses. The study indicates that these activities have not been "finally determined," and also states that no additional traffic is anticipated. However, depending on what uses are proposed, this may or may not be the case. Please clarify.

Applicant's Response (July 30, 2009): The applicant has near-term plans for those uses identified in Phase I. Should the Applicant choose to further develop the by-right park, some or all of the uses identified in Phase II uses may be provided. However, no additional staffing or traffic are associated with Phase II; rather, those additional recreational activities and uses would complement the Phase I uses.

Issue Status: Issue not resolved. Since the Applicant has indicated that "... additional recreational activities and the build-out year for Phase II are not finally determined." OTS recommends that these applications be limited to the proposed Phase I uses.

2. **Initial Staff Comment (1st Referral)**: Gorove/Slade notes that existing traffic counts were conducted on Tuesday, November 11, 2008 a federal holiday. In addition, additional "spot counts" were conducted on November 18, 2008 in order adjust the counts conducted on the 11th. OTS questions why 1) Gorove/Slade chose to conduct traffic counts on a federal holiday; 2) how the "spot counts" were used to adjust the original counts; and 3) why new AM and PM peak hour counts were not conducted.

Applicant's Response (July 30, 2009): The critical count measure at this location was the through traffic along Route 15. Historical counts and VDOT ADT data were a primary source of data. In addition, counts were conducted on two separate days to get through and turning traffic at this location. In order to expedite the analysis prior to the holiday season, counts were performed on November 11, 2008, a federal holiday, but not in Loudoun County School holiday. To clarify that the federal holiday did not substantially alter traffic patterns, follow up counts were conducted the following week. The follow up counts, or spot counts are a means of focusing in on critical peak hour and doing a full update of that hour. They are essentially new AM and PM counts, just during a focused time period. "Spot counts" were used to adjust the original counts obtained on November 11 in order to reflect actual traffic

conditions during a typical weekday. An increase was applied to the volumes obtained on November 11 to account for the difference in traffic between a typical weekday and a federal holiday. OTS was consulted prior proceeding with the data collection on November 11, 2008. The count schedule was accepted with the understanding that follow-up spot counts would be conducted to validate and update the data taken November 11.

Issue Status: Issue not resolved. OTS accepts the Applicant's explanation regarding traffic counts taken on a federal holiday, but will not accept such counts in the future.

Appendix C of the TIA provides "Adjusted Volumes" for traffic counts for November 11, 2008 and November 18, 2008. However, the data is not depicted showing the raw data for each day individually, nor how the data was verified with a spot check. In addition, the TIA (Appendix C) provides raw volumes from September 6, 2008. Please explain the relevance of this data.

- Initial Staff Comment (1st Referral):** OTS is concerned about the unacceptable LOS on westbound Limestone School Road at US 15. The traffic generated by the proposed uses will exacerbate this situation. OTS recommends that the applicant make a fair share contribution for the purpose of constructing a traffic signal at this intersection when warranted. Preliminary calculations indicate that this contribution should be approximately 16% of the cost of the traffic signal at the time of construction. OTS is available to discuss this issue further with the applicant.

Applicant's Response (July 30, 2009): The intersection of US Route 15 and Limestone School Road currently operates and will continue to operate at an unacceptable LOS on westbound Limestone School Road at US 15. Therefore, the costs of any needed improvements would be spread among the traffic generators that currently exist, not the proposed park facility, which would generate less than 1 percent of the total traffic projected at this intersection. However, no mitigation measures have been recommended because there is not enough volume on the westbound approach to warrant roadway/signal improvements under existing and future scenarios based on the traffic analysis. Therefore, the applicant finds it outside its mitigation measures to contribute to the installation of a traffic signal at the study intersection now or if warranted in the future.

Issue Status: Issue not resolved. See comment #4 below.

- Initial Staff Comment (1st Referral):** Gorove/Slade provides a signal warrant analysis in Appendix H of the TIA. This signal warrant analysis is based on "Estimated Average Daily Traffic" ("To be used only for NEW INTERSECTIONS or other locations where actual traffic volumes cannot be counted.") The volumes used in this analysis appear to be less than actual existing counts from several years ago as provided in the traffic study. The analysis should reflect projected conditions at site buildout. Please explain the methodology used for this analysis.

Applicant's Response (July 30, 2009): As agreed upon at the scoping meeting, a traffic signal warrant analysis was performed at the intersection of US Route 15 and Limestone School Road under future conditions with development (2015) based on the Manual on Traffic Signal Design (MTSD) guidelines. A full traffic signal warrant study was not required.

The future volumes with the proposed development were considered in the traffic signal warrant analysis. They were multiplied by 10, which is a k-factor commonly used in the transportation engineering field, to estimate average daily traffic at the study intersection. Therefore, these volumes were higher than the actual recorded counts since an inherent growth rate of 3 percent compounded annually over a seven-year period was added to the existing through traffic on US Route 15 to account for regional increases in traffic due to background growth and development outside the study area. Please refer to Figure A and Appendix H in the Traffic Study for traffic volume comparisons.

Issue Status: Issue not resolved. OTS believes the methodology used in the warrant analysis is flawed and requires further discussion. OTS is available to meet with the applicant to discuss this issue and comment #3 as it relates to the warrant analysis. Additional comments may be provided depending on the outcome of those discussions.

5. Initial Staff Comment (1st Referral): The applicant notes in their Traffic Impact Analysis (TIA) that a right-turn taper is warranted on northbound US 15 (Appendix H). The applicant should construct the warranted taper.

Applicant's Response (July 30, 2009): A wide shoulder was recently added as part of a VDOT project, to northbound US 15 at its intersection with Limestone School. The shoulder was considered the alternative at the time of its installation. Although not included in the TIA, it should be noted that a review of existing volumes shows that a right-turn taper is warranted under existing conditions. Should this shoulder be converted into a right-turn taper, the Applicant will contribute its fair share toward the restriping of the current asphalt area once the County is in receipt of the remaining money.

Issue Status: Issue not resolved. While the Applicant's TIA shows that at least a taper is required on US Route 15 at Limestone School Road, OTS recommends that a full-length right-turn lane be installed at this location by the Applicant due to the length of vehicles that are anticipated to access the park uses. There is sufficient existing ROW for such improvements.

6. Initial Staff Comment (1st Referral): There are several stream crossings along the roadways leading to the proposed site. In particular, OTS is concerned that the one-lane bridge stream crossing on Limestone School Road (west of Temple Hall Lane) will cause conflicts with opposing traffic towing boats. The applicant should work

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with VDOT to ensure that the traffic generated by the proposed uses has no adverse impact on the operation of the local road network, particularly with respect to these crossings. One option to address the one-lane bridge concerns may be to investigate having park patrons enter the park via Limestone School Road and exit via Spinks Ferry Road. Such a traffic management scheme could potentially improve the LOS at Limestone School Road and reduce conflicts at the above mentioned bridges. However, changes to the traffic management scheme would necessitate the applicant revise the TIA and investigate the LOS at Spinks Ferry Road. Further discussion with VDOT is necessary.

Applicant's Response (July 30, 2009): The Applicant anticipates 20-weekend boat launches and two-weekday boat launches, the majority of which will be canoes or kayaks, which are carried on top of the car and not in boat trailers. These estimates are based on the usage trends at Algonkian Regional Park in eastern Loudoun, which experiences an estimated seven launches a day, and at Fountainheads Regional Park in Fairfax, both of which have 60% of launches by car-top. The launches expected at White's Ford are below those seen at Algonkian because the proposed park is in a less populated area. With so few daily boat launches, a conflict on any one of the bridges would be rare and could easily be mitigated by establishing a yield pattern.

It is unlikely that Park traffic would utilize Spinks Ferry Road because its intersection with US 15 is quite far from the site. As noted by OTS, a change in the site distribution would affect the entire traffic study since it was previously agreed that the intersection of US Route 15 and Spinks Ferry did not need to be studied.

Issue Status: Issue not resolved. The Applicant should provide data of relevant boat usage at Fountainhead Regional Park and Algonkian Regional Park to justify the assumptions put forth. The Applicant should also make improvements on Limestone School Road at the location of one-lane bridge to improve sight distance and facilitate safe traffic operations; these improvements should include yield signs. The Applicant should also direct traffic exiting the site to access US 15 via Spinks Ferry Road, so as to avoid possible conflicts at the one lane bridge on Limestone School Road.

7. Initial Staff Comment (1st Referral): OTS recommends that the applicant ensure there is adequate parking within the proposed park. As noted by the applicant in its special exception plat, specific number and location of parking spaces will be determined at site plan approval. OTS will defer to the Department of Building and Development (Zoning Administration) for their findings and recommendations.

Applicant's Response (July 30, 2009): The Applicant will ensure that Parking complies with all regulations, at time of site plan.

Issue Status: Issue resolved.

8. Initial Staff Comment (1st Referral): The applicant notes in their TIA, in Appendix A that no Recreational vehicles or 5th-wheel trailers will be allowed in the park. OTS welcomes this restriction and believes that this should be included as a condition for approval.

Applicant's Response (July 30, 2009): Rather than set a restriction on a certain type of vehicle, the Applicant finds it more appropriate to restrict vehicles based on their length. Therefore, the Applicant will agree to restrict vehicles that are greater than 25 feet in length and trailers that are greater than 25 feet in length. However, should Hibler Road be improved at some point, the Applicant proposes that the length limitations increase to 35 feet for an individual vehicle and 35 feet for a trailer.

Issue Status: Issue not resolved. OTS concurs with the Applicant's TIA and reiterates its position that no recreational vehicles or 5th-wheel trailers should be allowed in the park. The introduction of large recreational vehicles/trailers of any length onto admittedly a narrow unpaved Hibler Road will cause safety concerns. Hibler Road is too narrow to have large recreational vehicles safely oppose each other.

9. Initial Staff Comment (1st Referral): OTS recommends that the applicant ensure that the future road connecting existing Hibler Road to the proposed boat launch be built to private road standards as established by the FSM. OTS defers to the Department of Building and Development (Zoning Administration) for their findings and recommendations on the road classifications.

Applicant's Response (July 30, 2009): Comment Acknowledged.

Issue Status: Issue resolved.

10. Initial Staff Comment (1st Referral): OTS recommends that the applicant ensure that all internal roads and existing Hibler Road are upgraded or built to FSM standards to provide safe pedestrian and horse crossings.

Applicant's Response (July 30, 2009): [The Applicant did not provide a response to this comment].

Issue Status: Issue not resolved. (See comment #12 below regarding recommended improvements to Hibler road.)

Supplemental Comments

11. OTS concurs with VDOT comments (dated March 27, 2009) regarding the Applicant's use of the ITE codes. OTS believes that using the ITE code 417 (Regional Park) based on acreage, and not number of employees, is the appropriate method for trip generation. As such OTS believes that the Applicant should revised certain parts of the traffic study using the acreage-based ITE code. These revisions

should include turn-lane analysis and traffic signal analysis. OTS is available to discuss these changes to the traffic study with the Applicant.

12. OTS concurs with VDOT comments (dated March 27, 2009) that Hibler Road should be upgraded to a GS-4 standard by the Applicant as it is not adequate to serve the proposed uses in its current form, particularly if recreational vehicles are to be permitted in the park. Hibler Road should be upgraded to a GS-4 standard along its entire length.

Conclusion

OTS cannot support approval of this proposal in its current form. A meeting with the Applicant and VDOT is necessary to discuss the transportation issues identified in this referral.

cc: Andrew Beacher, Assistant Director, OTS
Lou Mosurak, Senior Coordinator, OTS
Tom VanPoole, Senior Transportation Engineer, VDOT

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**County of Loudoun
Office of Transportation Services**

MEMORANDUM

DATE: April 13, 2009
TO: Nicole Steele, Project Manager, Department of Planning
FROM: Marc Lewis-DeGrace, Transportation Planner *MLDG*
THROUGH: Shaheer Assad, Senior Transportation Engineer/Planner *Assad*
SUBJECT: **SPEX 2008-0061, SPEX 2008-0062 CMPT 2008-0020
White's Ford Park**

Background

This application consists of three separate applications all concerning a proposed regional park administered by the Northern Virginia Regional Park Authority (NVRPA). In its consideration of this application, OTS reviewed a Statement of Justification dated November 26, 2008 and a traffic study, dated November 25, 2008, prepared by Gorove/Slade Associates.

The site is approximately 275 acres and is located north and south of Hibler Road (Route 656) between Harrison Hill Lane and the Potomac River. The site will have access from Hibler Road, which will connect to James Monroe Highway (US Route 15) via Limestone School Road (Route 661) and Spinks Ferry Road (Route 657).

The proposed park land is currently zoned Agricultural Rural – 1 (AR-1). The proposed park will be implemented in two phases, the first will include the installation of a boat launch, and camping facilities and will be completed by 2015. The second phase will include equestrian trail facilities that will be completed at a future date not yet determined.

The proposed development does not seek to change the current zoning AR-1, and “community, neighborhood, or regional park, active recreational uses” are permitted by the Revised 1993 Loudoun County Zoning Ordinance. The boat launch, which will be constructed along the Potomac River and along the camping facilities, will each require a special exception.

Existing, Planned and Programmed Roads

US Route 15 (James Monroe Highway) is a two-lane rural highway. It serves heavy commuter traffic during peak hours. The proposed main entrance for the White's Ford Park at US 15 and

Limestone School Road has recently been improved by the Virginia Department of Transportation (VDOT). There is a left-turn lane for southbound traffic on US 15 turning onto Limestone School Road and a paved shoulder for northbound traffic on US 15 turning onto Limestone School Road. According to the most recent data provided by VDOT (2007) this section of US 15 carried 21,000 vehicles per day. The Countywide Transportation Plan (CTP) makes no mention of Limestone School Road or Hibler Road. The CTP states that there are no planned improvements to this section of US 15.

Limestone School Road (Route 661) is a narrow unpaved road that is approximately 20 feet wide with no shoulders. According to the most recent data provided by VDOT (2005), this section of Route 661 carries 520 vehicles per day.

Hibler Road (Route 656) is a narrow unpaved road that is approximately 20 feet wide with no shoulders. According to the most recent data provided by VDOT, this section of Route 656 carries 150 vehicles per day.

Existing and Forecasted Traffic Volumes and Levels of Service

The traffic impact analysis that was provided to OTS shows that the existing intersection of US 15 and Limestone School Road will not be adversely affected by the proposed development. Based on 2008 field observations and traffic counts, the westbound approach (Limestone School Road approaching US 15) is at a failing level-of-service (LOS) F in the AM and PM peak hours. The southbound left-turn movement (US 15 south turning onto Limestone School Road) is at an acceptable LOS in the AM peak hour (LOS A) and also in the PM peak hour (LOS B). Existing LOS are shown below.

Existing (2008) Intersection Capacity Analysis

Intersection (Approach/Movement)	Existing Conditions			
	AM Peak Hour		PM Peak Hour	
	LOS	Delay	LOS	Delay
US Route 15 and Limestone School Road Overall Intersection (Unsignalized)	N/A	N/A	N/A	N/A
Westbound Approach	F	55.6	F	60.2
Southbound Left Turn Movement	A	8.4	B	11.1

Source: Gorove/Slade Associates.

Using Institute of Transportation Engineers (ITE) guidelines for trip generation, the traffic consultant forecasts minimal impact on the existing road network during weekday peak hours. Using ITE trip generation code 417 (Regional Park), it is forecast that the site will generate 160 daily weekday trips, including 15 vehicle trips in the AM peak hour and 26 vehicle trips in the PM peak hour. A summary of trip generation, as well as future conditions at the intersection of US 15 and Limestone School Road are included below.

Proposed Trip Generation based on ITE Standards

Land Use	ITE Code	Size	Weekday				Weekend										
			AM Peak Hour		PM Peak Hour		Daily		Saturday Peak Hour		Daily		Sunday Peak Hour		Daily		
			In	Out	Total	In	Out	Total	Total	In	Out	Total	Total	In	Out	Total	Total
Regional Park	417	2 Employees	9	6	15	12	14	26	160	17	17	34	257	14	27	41	326

Source: Gorove/Slade Associates.

Future Conditions with Development (2015) Intersection Analysis

Intersection (Approach/Movement)	Future Conditions with Development (2015)			
	AM Peak Hour		PM Peak Hour	
	LOS	Delay	LOS	Delay
US Route 15 and Limestone School Road Overall Intersection (Unsignalized)	N/A	N/A	N/A	N/A
Westbound Approach	F	150.7	F	168.4
Southbound Left Turn Movement	A	8.7	B	13.1

Transportation Comments

The Office of Transportation Services (OTS) references for this plan are the CTP and The Loudoun County Facilities Standards Manual (FSM). OTS has reviewed the plans and we have the following comments:

1. It is not clear from the traffic study whether the applicant is seeking approval for any Phase II uses. The study indicates that these activities have not been "finally determined," and also states that no additional traffic is anticipated. However, depending on what uses are proposed, this may or may not be the case. Please clarify.
2. Gorove/Slade notes that existing traffic counts were conducted on Tuesday, November 11, 2008 a federal holiday. In addition, additional "spot counts" were conducted on November 18, 2008 in order adjust the counts conducted on the 11th. OTS questions why 1) Gorove/Slade chose to conduct traffic counts on a federal holiday; 2) how the "spot counts" were used to adjust the original counts; and 3) why new AM and PM peak hour counts were not conducted.
3. OTS is concerned about the unacceptable LOS on westbound Limestone School Road at US 15. The traffic generated by the proposed uses will exacerbate this situation. OTS recommends that the applicant make a fair share contribution for the purpose of constructing a traffic signal at this intersection when warranted. Preliminary calculations indicate that this contribution should be approximately 16% of the cost of the traffic signal at the time of construction. OTS is available to discuss this issue further with the applicant.
4. Gorove/Slade provides a signal warrant analysis in Appendix H of the TIA. This signal warrant analysis is based on "Estimated Average Daily Traffic" ("To be used only for NEW INTERSECTIONS or other locations where actual traffic volumes cannot be counted.") The volumes used in this analysis appear to be less than actual existing counts

from several years ago as provided in the traffic study. The analysis should reflect projected conditions at site buildout. Please explain the methodology used for this analysis.

5. The applicant notes in their Traffic Impact Analysis (TIA) that a right-turn taper is warranted on northbound US 15 (Appendix H). The applicant should construct the warranted taper.
6. There are several stream crossings along the roadways leading to the proposed site. In particular, OTS is concerned that the one-lane bridge stream crossing on Limestone School Road (west of Temple Hall Lane) will cause conflicts with opposing traffic towing boats. The applicant should work with VDOT to ensure that the traffic generated by the proposed uses has no adverse impact on the operation of the local road network, particularly with respect to these crossings. One option to address the one-lane bridge concerns may be to investigate having park patrons enter the park via Limestone School Road and exit via Spinks Ferry Road. Such a traffic management scheme could potentially improve the LOS at Limestone School Road and reduce conflicts at the above mentioned bridges. However, changes to the traffic management scheme would necessitate the applicant revise the TIA and investigate the LOS at Spinks Ferry Road. Further discussion with VDOT is necessary.
7. OTS recommends that the applicant ensure there is adequate parking within the proposed park. As noted by the applicant in its special exception plat, specific number and location of parking spaces will be determined at site plan approval. OTS will defer to the Department of Building and Development (Zoning Administration) for their findings and recommendations.
8. The applicant notes in their TIA, in Appendix A, that no Recreational vehicles or 5th-wheel trailers will be allowed in the park. OTS welcomes this restriction and believes that this should be included as a condition for approval.
9. OTS recommends that the applicant ensure that the future road connecting existing Hibler Road to the proposed boat launch be built to private road standards as established by the FSM. OTS defers to the Department of Building and Development (Zoning Administration) for their findings and recommendations on the road classifications.
10. OTS recommends that the applicant ensure that all internal roads and existing Hibler Road are upgraded or built to FSM standards to provide safe pedestrian and horse crossings.

Conclusion

The Office of Transportation Services may have additional comments after first submission responses are provided.

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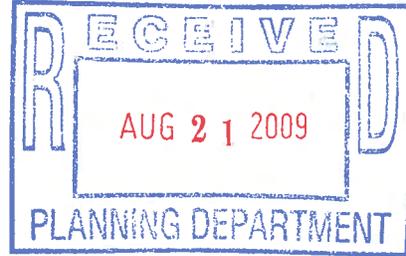
COMMONWEALTH of VIRGINIA

DAVID S. EKERN, P.E.
COMMISSIONER

DEPARTMENT OF TRANSPORTATION

14685 Avion Parkway
Chantilly, VA 20151
(703) 383-VDOT (8368)

August 17, 2009



Ms. Nicole Steele
County of Loudoun
Department of Planning MSC#62
1 Harrison Street, S.E.
P.O. Box 7000
Leesburg, Virginia 20177-7000

Re: Whites Ford Park
Loudoun County Application Numbers CMPT 2008-0020, SPEX 2008-0061,
and SPEX 2008-0062

Dear Ms. Steele:

We have reviewed the above application as requested in your August 10, 2009 transmittal (received August 14, 2009). Our March 27, 2009 comments continue to apply as follows:

1. The estimated traffic generation using acreage is much greater than the estimates using number of employees.
2. Are there traffic counts from similar sites available to substantiate the NVRPA attendance estimates and related vehicle occupancy assumptions (Tables 4A and 4B and Appendix A)?
3. We believe that some site generated trips would use Route 657 Spinks Ferry Road in preference to Route 661 Limestone School Road to access the site, if they are aware of the option. Since Route 657 is paved from Route 15 to Route 661, it may be desirable to publicize Route 657 as a route to the park.
4. This development will at least double the weekday traffic on Route 656 Hibler Road, and significantly increase traffic on Route 661 Limestone School Road, which are narrow, unpaved, substandard roads. Any improvements provided through the development process will be desirable. We support any recommendations by county staff to that effect.

ATTACHMENT 1f

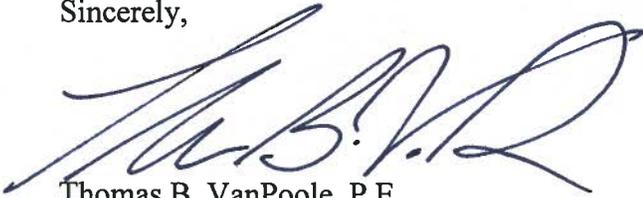
A-47

Whites Ford Park
August 17, 2009
Page 2

5. At a minimum, we would expect this development to improve the lanes, shoulders, and ditches of Route 656 Hibler Road along the site frontage in accordance with standard GS-4. While the applicant's response expresses concern with impact on trees along the road, most such trees do not appear to be very close to the road.

If you have any questions, please call me at (703) 383-2424.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. B. VanPoole', written in a cursive style.

Thomas B. VanPoole, P.E.
Senior Transportation Engineer

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COMMONWEALTH of VIRGINIA

DAVID S. EKERN, P.E.
COMMISSIONER

DEPARTMENT OF TRANSPORTATION

14685 Avion Parkway
Chantilly, VA 20151
(703) 383-VDOT (8368)

March 27, 2009

Ms. Nicole Steele
County of Loudoun
Department of Planning MSC#62
1 Harrison Street, S.E.
P.O. Box 7000
Leesburg, Virginia 20177-7000

Re: Whites Ford Park
Loudoun County Application Numbers CMPT 2008-0020, SPEX 2008-0061,
and SPEX 2008-0062

Dear Ms. Steele:

We have reviewed the above application as requested in your February 20, 2009 transmittal (received February 25, 2009). We offer the following comments:

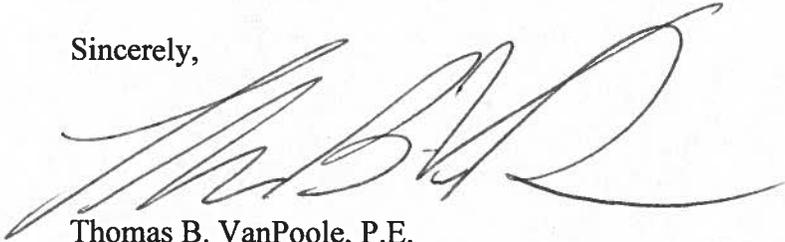
1. Show the estimated traffic generation using acreage for comparison with the estimates using number of employees. Why does the traffic consultant feel that estimates based on the size of the park are less representative than estimates based on number of park employees?
2. Provide additional background on the sources of the NVRPA attendance estimates and related vehicle occupancy assumptions (Tables 4A and 4B and Appendix A).
3. Would any site generated trips use Route 657 Spinks Ferry Road in preference to Route 661 Limestone School Road to access the site? Since Route 657 is paved from Route 15 to Route 661, it may be desirable to publicize Route 657 as a route to the park.
4. This development will at least double the weekday traffic on Route 656 Hibler Road, and significantly increase traffic on Route 661 Limestone School Road, which are narrow, unpaved, substandard roads. Any improvements provided through the development process will be desirable.

Whites Ford Park
March 27, 2009
Page 2

5. At a minimum, we would expect this development to improve the lanes, shoulders, and ditches of Route 656 Hibler Road along the site frontage in accordance with standard GS-4.

If you have any questions, please call me at (703) 383-2424.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. VanPoole', written in a cursive style.

Thomas B. VanPoole, P.E.
Senior Transportation Engineer



Loudoun County Health Department

P.O. Box 7000
Leesburg VA 20177-7000



Environmental Health
Phone: 703 / 777-0234
Fax: 703 / 771-5023

Community Health
Phone: 703 / 777-0236
Fax: 703 / 771-5393

20 February 2009

MEMORANDUM TO: Nicole Steele, Project Manager
Department of Planning, **MSC 62**

FROM:  Matthew D. Tolley
Sr. Env. Health Specialist
Division of Environmental Health, **MSC 68**

SUBJECT: **SPEX 2008-0061 & 62 & CMPT 2008-0020;**
White's Ford Park
LCTM: 31/5 (PIN 070-36-5320)

The Health Department recommends approval of this application. The proposed development will utilize numerous previously approved drainfield sites. The details of water and sewerage needs have not been worked out with NVPA but suffice to say there is capacity enough for what appears to be their ultimate plan. The plat reviewed was prepared by Christopher Consultants and was dated 30 January 2009.

Attachments Yes ___ No X

If further information or clarification on the above project is required, please contact Matt Tolley at 771-5248.

MDT/JEL/mt
c:subdvgd.ref



ATTACHMENT 1g

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From: Boyd Church
To: Nicole Steele
Date: 3/19/2009 3:15:42 PM
Subject: SPEX 2008-0061, SPEX 2008-0062 & CMPT 2008-0020

Dear Nicole:

DGS has review the plans and since no stormwater concept was submitted, we reserve our comments until the project progresses to the development review stage.

Boyd

CC: Randy Williford

ATTACHMENT 1h

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LOUDOUN COUNTY, VIRGINIA
Department of Fire, Rescue and Emergency Management

803 Sycolin Road, Suite 104 Leesburg, VA 20175
Phone 703-777-0333 Fax 703-771-5359



Memorandum



To: Nicole Steele, Project Manager
From: Maria Figueroa Taylor, Fire-Rescue Planner
Date: August 11, 2009
Subject: White's Ford Park, second referral
SPEX 2008-0061, SPEX 2008+0062 & CMPT 2008-0020

Thank you for the opportunity to review the applicant's response to referral comments dated April 1, 2009 regarding the above captioned applications.

Staff requested more details regarding the internal road network. While the Applicant stated that the roadways will meet FSM specifications, the Fire and Rescue Planning Staff respectfully requests an opportunity to review the site plan to ensure adequate emergency vehicle access and circulation throughout the parcel. Review of the site plan will also allow the Fire-Rescue Staff to learn more specifics of the proposed structures and pre-plan emergency response to the facility.

If you have any questions or need additional information, please contact me at 703-777-0333.

c: Project file

Teamwork

ATTACHMENT 1

** Service*

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Loudoun County, Virginia
Department of Fire, Rescue and Emergency Management

803 Sycolin Road, Suite 104 Leesburg, VA 20175
Phone 703-777-0333 Fax 703-771-5359



Memorandum

To: Nicole Steele, Project Manager
From: Maria Figueroa Taylor, Fire-Rescue Planner
Date: April 1, 2009
Subject: White's Ford Park
SPEX 2008-0061, SPEX 2008+0062 & CMPT 2008-0020



Thank you for the opportunity to review the above captioned applications.

The Fire-Rescue GIS and Mapping coordinator offered the following information regarding estimated response times:

PIN	Project name	Lucketts VFRC Station 10 Travel Time
070-36-5320	White's Ford Park	7 minutes, 31 seconds

The Travel Times for each project were calculated using ArcGIS and Network Analyst extension to calculate the travel time in minutes. To get the total response time another two minutes were added to account for dispatching and turnout. This assumes that the station is staffed at the time of the call. If the station is unoccupied another one to three minutes should be added.

Project name	Lucketts VFRC Station 10 Response Times
White's Ford Park	9 minutes, 31 seconds

Staff respectfully requests that the applicant provide more detail regarding the internal road network. Staff is not able to evaluate emergency vehicle access and circulation throughout the parcel since the submitted plan does not show sufficient detail: road widths, proposed improvements etc. Staff can not provide a recommendation of approval until the requested information is provided.

Staff also recommends the applicant would consider installing a dry hydrant in the area of the boat ramp (with associated access road) to facilitate access to water for firefighting purposes not only for the proposed use but to protect neighboring uses.

If you have any questions or need additional information, please contact me at 703-777-0333.

c: Project file



**COUNTY OF LOUDOUN
PARKS, RECREATION AND COMMUNITY SERVICES
REFERRAL MEMORANDUM**

To: Nicole Steele, Project Manager, Planning Department (MSC #62)

From: *[Signature]* Brian G. Fuller, Park Planner, Facilities Planning and Development (MSC #78)

Through: *[Signature]* Mark A. Novak, Chief Park Planner, Facilities Planning and Development

CC: Diane Ryburn, Director

Steve Torpy, Assistant Director

Su Webb, PROS Board, Chairman, Catoctin District

Robert C. Wright, PROS Board, Open Space Member

James E. O'Conner, PROS Board, Open Space Member



Date: August 20, 2009

Subject: **White's Ford Park (2nd Submission)**
SPEX 2008-0061, SPEX 2008-0062, and CMPT 2008-0020

Election District: Catoctin **Sub Planning Area:** Route 15 North

MCPI #: 077-36-5320

BACKGROUND AND ANALYSIS:

The Northern Virginia Regional Park Authority (Applicant) is seeking a Special Exception to allow a boat ramp and/or pier to provide water access to the Potomac River; a Minor Special Exception to allow a campground with overnight stays in tents, cabins or other types of shelters; and a Commission Permit to allow a regional park. Proposed uses within the park include public hiking trails, camping and cabin facilities, a boat ramp, picnic pavilions, playgrounds, event areas, interpretation of the historic home, and a future equestrian facility.

The Property is currently approximately 294.6 acres, located at the end of the state-maintained portion of Hibler Road (Route 656), east of Route 15, north of Leesburg along the Potomac River. The Property is located within the AR-1 Zoning District, and portions of the property are subject to a conservation easement held by the Virginia Outdoors Foundation (VOF). The current owner of the Property (QDP, LLC) has filed a subdivision application to retain 20 acres, leaving approximately 275 for the proposed passive park. The Property was recently subject to a Preliminary Subdivision Plat, Gianna Terra (SBPL 2006-0084), approved on July 10, 2007.

POLICY:

The site is governed under the land use policies in the Revised General Plan, the Revised 1993 Zoning Ordinance, the Revised Countywide Transportation Plan (CTP), and the Loudoun County Bicycle and Pedestrian Mobility Master Plan (BPMMP). The subject site is located within the Rural-20 Policy Area. The Planned Land Use Map adopted with the Revised General Plan identifies the subject site as planned for Rural 20 (low-density housing).

COMMENTS:

The Department of Parks, Recreation and Community Services (PRCS) has reviewed the Applicant's responses dated July 1, 2009 to referral comments dated March 25, 2009 and the revised SPEX Plat dated July 1, 2009. The following is a summary of the current status of new comments identified by PRCS:

1. Staff notes that the Applicant is proposing in their Statement of Justification to retain Hibler Road (Route 656) as a rural, gravel road. However, Staff is familiar with the existing conditions of the current road, and notes that the road is essentially one-lane wide in most places, and may not be able to adequately accommodate the potential traffic to and from a Regional Park. Furthermore, direct access to Hibler Road from Route 15 south of the subject property is served by Limestone School Road (Route 661). Limestone School Road crosses a fork of Limestone Branch over a one-lane bridge, which may not be able to adequately handle the volume of traffic to a Regional Park. In addition, since the subject property is located at the end of the state-maintained portion of Hibler Road, there is not a secondary point of access to relieve potential traffic. Given the desire and demand for public equestrian facilities, campgrounds and boat ramps on the Potomac River in Loudoun County, the Applicant may be underestimating the potential popularity of such facilities and the traffic impacts they may have on these rural roads.

Applicant Response: Hibler Road and Limestone School Road in the vicinity of the project are two-lane, 20-foot-wide unpaved rural roads. The unpaved surface is consistent with the rural character of the surrounding farms and residences and acts as a traffic-calming measure as it limits operating speeds. The Applicant is proposing to maintain these roads largely in their current condition, in compliance with the Loudoun County Revised General Plan policy that states: "protecting the rural character and scenic quality of rural roads is fundamental to the rural strategy" (Revised General Plan, Chapter 7).

Although the proposed facility is a regional park, that name is driven by the Park Authority being a regional agency, not by the services offered at the park. The proposed development is expected to generate a maximum of 350 daily trips, which would occur over the weekend. When combined with the 150 existing trips, Hibler Road would be carrying 500 vehicles on a peak day. State and local rural road plans specify that rural roads that carry less than 1,000 vehicles per day remain as unpaved, substandard roads to preserve the rural nature of the area. Therefore, the Applicant plans to leave Hibler Road in its existing, rural condition, which will be able to accommodate existing and anticipated traffic while maintaining the road's rural and scenic quality.

Staff has reviewed the provided Traffic Study, and notes that the main studied intersection (Route 15 and Limestone School Road) currently operates at Level F for westbound traffic and will continue to do so throughout the build-out of the proposed park. However, no traffic mitigation measures are warranted or recommended. The Traffic Study adequately calculated current levels and future growth at the Route 15 and Limestone School Road, but did not take into account or make any recommendation on the existing condition of Hibler Road.

Applicant Response: *No improvements are proposed at the intersection of Rt. 15 and Limestone School Road or along Hibler Road. The proposed park use is expected to generate less than 1 percent of the traffic at that intersection and therefore will not have any impact to speak of on the functionality of the intersection, which staff recognizes in this comment. That said, it should be noted that this intersection was recently improved by VDOT to include a 300-foot southbound left turn lane bay and a continuous northbound paved shoulder in order to facilitate conflicting movements in the major approach.*

As stated above, the Applicant proposed to leave Hibler Road in its current, rural condition, a decision guided by the County's Revised General Plan and the state and local road plans that specify that rural roads carry less than 1,000 vehicles per day can remain as unpaved, substandard roads to preserve the rural nature of the area.

While PRCS supports the Applicant's intentions to preserve the rural quality and character of Hibler Road per the Revised General Plan, the Plan did not originally intend for a Regional Park to be located at the end of Hibler Road. The area around Hibler Road is very agricultural in nature and farm equipment frequently crosses and/or utilizes the roadway. The current road is narrow and contains several blind turns and dips that may be hazardous to park patrons, especially those pulling boat trailers to the proposed boat ramp on the river.

Applicant Response: *There will be no swimming pool, ball fields or golf course at White's Ford Park, all significant traffic generators. Rather, the park is designed for campers, hikers, and river users.*

It should be noted that NVRPA is seeking up to 100 total camping sites. This is a slight increase from what was considered in the traffic assessment. Even with this change it is only expected to generate up to 172 weekday vehicles trips and at most 350 weekend daily trips. When added to the existing traffic on Hibler Road, collective trips remain below the 1,000-vehicle threshold that encourages rural roads to be upgraded and paved. In addition, it's important to note that the road's current design and surface serve as traffic calming measures that tend to result in lower operating speeds of vehicles, and the posted speed limit is low in order to prevent accidents. The revised trip generation is discussed further in the VDOT response comments.

Staff recommends that the Applicant consider improvements along Hibler Road to include widening the travel lanes and improving the shoulders and ditches along the road. The Applicant should consult directly with the Office of Transportation Services (OTS) and the Virginia Department of Transportation (VDOT) to better define what improvements are necessary.

Applicant Response: *Per the previous response, no improvements are planned for Hibler Road, which is both in keeping with the policies of the Revised General Plan that rural roads should be maintained in their current condition and guidance in the traffic study that the park traffic combined with the existing traffic will be less than 1,000 vehicles per day, which can be accommodated by the road in its existing condition.*

Furthermore, Staff notes that Hibler Road (Route 656) serves up to eight (8) existing private residential lots and one (1) proposed residential lot beyond the subject property. Please provide more information on how the Applicant is proposing to accommodate through-traffic on Hibler Road within the park.

Applicant Response: *Planned park operations will not interfere with the operations of Hibler Road, which will remain open to the public and accommodate traffic across the Property.*

Issue Status: Unresolved. PRCS maintains our original stance, that while it is admirable that the Applicant desires to maintain the rural quality of the roadways per the Revised General Plan, Limestone School Road and Hibler Road may jeopardize patron safety. Portions of Hibler Road are much narrower than the Applicant's claim of a 20' width, and the several blind curves and hills (regardless of the road width), make travel precarious in its current condition, not even speaking of the potential recreational

A'62

vehicles (RVs), large travel trailers (5th-wheels), and/or boat trailers that would patronize this facility.

In addition, Staff concurs with the initial comments from VDOT and OTS that recommend restricting traffic to use Spinks Ferry Road instead of Limestone School Road. While it may cause a longer trip to the park, it is a much safer road. Staff also supports the recommendation from OTS to restrict RVs and 5th-wheel trailers from the park for patron safety concerns due to the nature of Hibler Road.

Furthermore, with these recommendations and the Applicant's projected user increase from the initial traffic study, Staff recommends that a revised Traffic Impact Analysis (TIA) be completed and submitted for review.

2. Staff has reviewed the provided Archeological Investigations on the subject property. The property lies within the Catoctin Rural Historic District. The Phase I study for the northern +/-150 acres identifies three (3) sites that are considered to be potentially eligible for inclusion on the National Register of Historic Places, and avoidance of these sites or Phase II evaluations are recommended. Furthermore, an intensive architectural survey is recommended for the historic farm complex (including the Colonel White House). The Phase IA study for the southern +/-131 acres identified two (2) previously recorded sites and one new site, which was recommended for a full Phase I investigation.

Applicant Response: The Applicant will either avoid the identified areas of significance or commission localized Phase II studies before moving forward with development plans in any of the locations identified in the Phase I study. The Phase I study was conducted for the portions south of Hibler Road that the Phase IA study identified for study; that study is included with this submission. As for the Colonel White House, it is not part of this application; however, when the Applicant moves forward with restoration plans, NVRPA will consult a historical architect.

Staff notes that on the colored Concept Sketch, the Applicant is proposing to develop "Individual/Family Campsites and Youth Group Camping" within Site 44LD-A and the revised Probable Location of Site 44LD0365. These areas include a high number of artifact locations (Phase IA Exhibit 16), are noted to have a high archeology probability (Phase IA Exhibit 19) and are recommended for avoidance and/or controlled surface collection (Phase IA Exhibit 20). PRCS recommends revising the proposed location of these campsites to avoid any impact or disturbance to these areas, as they may be significant in nature and may include human burials.

Applicant Response: *The Applicant commissioned Thunderbird Archeology to conduct a Phase I study in the areas identified as Site 44LDA and the revised probable location of 44LD0365 mentioned above. That report is included with this submission. The campgrounds and parking areas that were previously located within those areas have been relocated. A road, however, will need to cross site 44LD0365 to provide access to the river, and Thunderbird has studied potential road crossings to identify areas that are void of artifacts. The road crossings are indentified on the revised Concept Sketch and Special Exception plat.*

In addition, the Applicant is proposing a "Colonel White House Interpretive Area" within Site 44LD1364 / VDHR 050-0012-0082. Staff requests more information on the proposed uses within the proposed interpretive area, and recommends that the Applicant coordinate any development in the area with the Virginia Department of Historic Resources, as the house and its ancillary structures are considered to be a contributing architectural resource to the Catoctin Rural Historic District.

Applicant Response: *Any interpretive area associated with the Colonel White House is not part of the special exception application before staff. When NVRPA is ready to move forward with this interpretive area, it will contact the Virginia Department of Historic Resources.*

PRCS requests that the aforementioned recommended Phase I and Phase II investigations be completed as a Special Exception Condition of Approval prior to Site Plan (STPL) approval. Furthermore, PRCS recommends that the Applicant apply for applicable listings on the National Register of Historic Places for the Colonel White House farmstead.

Applicant Response: *The Applicant commissioned a Phase I study for areas south of Hibler Road that were identified in the Phase IA study as having the potential for containing a high-level of artifacts, having archeological probability or being recommended for avoidance. That report is included with this submission and the Concept Sketch and Special Exception plat have been revised to relocate facilities out of those areas. If an area identified in the Phase I study cannot be avoided, the Applicant agrees to commission a Phase II study for that specific area before impacting it. Because of the Property's size, the Applicant finds it superfluous to automatically conduct such extensive studies for the entire Property, when so much of it will be left undisturbed. As for the Colonel White House, it is not part of this application.*

Issue Status: It appears that the SPEX Plat and Concept Sketch no longer show a road needing to cross archeology site 44LD0365, and that issue is resolved. Furthermore, in regards to Staff's previous recommendation of

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completing Phase I and Phase II studies on specific, identified locations with the site, it appears that the Applicant has already completed or has committed to these studies, and that issue is resolved. At no time did Staff previously recommend these studies to be completed for the entire property without recommendation from the initial studies.

However, in regards to the "Colonel White House Interpretive Area", the Applicant must demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the requirements of Section 6-1101(A) of the Revised 1993 Zoning Ordinance will be satisfied.

3. In addition to Comment 2, Staff notes that there are two separate Plat Notes (#7 and #18) on Sheet 1 discussing different identified Archeological Resources. Please revise or explain this discrepancy.

Applicant Response: The notes on Sheet 1 have been clarified.

Issue Status: Resolved.

4. Staff has reviewed the provided Wetlands Delineation Report on the subject property. The report states that there are several locations where areas of palustrine emergent wetlands and stream channels have been significantly disturbed by previous and current cattle operations on the subject property. PRCS recommends that the Applicant consult with the United States Army Corps of Engineers (USACE) and the Loudoun County Environmental Review Team (ERT) on methods for restoring and enhancing these critical environmental resources and habitats. Specific restoration methods should be included as a Special Exception Condition of Approval prior to Site Plan (STPL) approval.

Applicant Response: As noted above, the wetlands were disturbed by past operations and are not a cause of the proposed park use; therefore, the restoration of those areas cannot be required as a Special Exception condition. However, the Applicant will consult with the Army Corps of Engineers and/or ERT for recommendations on mitigating the existing disturbances that are identified in the Wetlands Delineation Report and will implement the appropriate methods at its discretion as funding permits.

Issue Status: Resolved. While Staff understands the fact that the Applicant did not originally cause the existing, disturbed wetland conditions, Staff recommends that the Applicant work toward mitigating these impacts as appropriate.

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5. The Special Exception Plat shows potential impact to wetlands and stream corridors throughout the proposed park, specifically along the proposed location of Primary Park Road in the northern half of the subject property. The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the potential impact to wetlands and stream corridors will be mitigated.

Applicant Response: *The Applicant will obtain all necessary state and federal permits prior to disturbing any jurisdictional waters or wetlands. In addition, the applicant will make a good faith effort to mitigate impacts to wetlands in accordance with the hierarchy of wetland mitigation established by Loudoun County and recommendations from the Army Corps of Engineers.*

Issue Status: Unresolved. In order to preserve the existing driveway conditions along the proposed secondary road to the Colonel White House and to minimize wetland and stream impacts, Staff recommends gating and/or signing the secondary road to keep campsite traffic from entering and/or exiting via this route.

6. The Special Exception Plat shows potential impact to moderately steep slopes throughout the proposed park, specifically along the proposed location of Primary Park Road in the northern half of the subject property. The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the potential impact to moderately steep slopes will be mitigated.

Applicant Response: *The portion of the road mentioned above provides access to the house, not the campsites and other park facilities, and will be maintained in its current condition. Since that road will not be altered, nor will it serve to carry large amounts of park traffic, no impacts to the surrounding topography are envisioned. To clearly differentiate between the function of this road – which is intended to provide access to the house, if needed – and the road that will serve the campsites, the Concept Sketch has been revised and different emphasis has been placed on the different types of roads.*

Issue Status: Unresolved. In order to preserve the existing driveway conditions along the proposed secondary road to the Colonel White House and to minimize steep slope impacts, Staff recommends gating and/or signing the secondary road to keep campsite traffic from entering and/or exiting via this route.

7. The Special Exception Plat shows potential impact to minor floodplain throughout the proposed park, specifically along the proposed location of Primary Park Road in the northern half of the subject property. The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the potential impact to minor floodplain will be mitigated.

Applicant Response: As stated above, no changes are envisioned to this road, which will continue to serve the house, not the park facilities that are part of this application. Should this roadway need to be widened or re-aligned, an associated floodplain alteration application will be prepared and submitted at that time.

Issue Status: Unresolved. In order to preserve the existing driveway conditions along the proposed secondary road to the Colonel White House and to minimize minor floodplain impacts, Staff recommends gating and/or signing the secondary road to keep campsite traffic from entering and/or exiting via this route.

8. Staff notes that per the colored Concept Sketch, campsite areas, restrooms/showers and picnic pavilions are located within the Potomac River major floodplain. Typically, structures such as restroom/shower facilities and picnic pavilions are not permitted within a major floodplain. In addition, please provide more information on what type of amenities are proposed within each campsite (e.g., tent pads, picnic tables, lantern posts, water spigots, etc.).

Applicant Response: The Concept Sketch has been revised to more accurately reflect what will be located in the floodplain; however, the specific details and locations of amenities have not been decided. That additional detail will be provided at time of site plan.

Issue Status: Unresolved. The Applicant must demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the standards of Section 4-1507 of the Revised 1993 Zoning Ordinance will be satisfied.

Staff again reminds the Applicant that structures such as picnic pavilions and/or playground equipment are not typically permitted within the major floodplain, as shown on the revised Concept Sketch. Such structures become barriers to the natural flow of floodplain waters and debris, and can be damaged causing a greater expense to the Applicant.

9. Please provide a Phasing Plan for the proposed development of the park. Staff notes that phasing appears to be proposed in the Traffic Study, but not clearly discussed on the Plat or within the Statement of Justification.

Applicant Response: *The uses requested in this Special Exception application – the boat ramp and campsites – are all included in the Phase 1 identified in the traffic study. A detailed phasing plan is not required as part of a Special Exception application.*

Issue Status: Resolved.

10. Staff notes that a land development application for the subject property, Gianna Terra (SBPL 2006-0084) was approved on July 10, 2007. Please revise the Preliminary Soils Review (PSR) note on Sheets 1 and 2 to include the previous land development application number for which the PSR was submitted.

Applicant Response: *These notes have been revised.*

Issue Status: Resolved.

11. Staff requests more information concerning the proposed “passive” uses within the park. Please provide additional details and/or illustrative drawings to better describe the proposed camping cabins/yurts, picnic pavilions, restrooms/showers and the “incidental seasonal” (temporary) concession/boat rental facility per Special Exception Checklist Item K6a.

Applicant Response: *The location and design of the park's facilities are still conceptual in nature. As the plans evolve, additional detail will be provided at time of site plan. At present, the Applicant anticipates a few group camping sites, approximately 100 family campsites and 10 cabins; however, this mixture of overnight facilities may change as plans develop but collectively will not exceed the 100 sites permitted for Level II campgrounds as defined in Section 5-646 (A) of the Zoning Ordinance. Any concession/boat rental facility would be located proximate to the boat ramp and be less than 840 square feet, which is permitted by-right in the Floodplain Overlay District. Restrooms are planned to be located north and south of Hibler Road, but the exact location and design of those facilities, which are permitted by-right, have not been determined. Picnic shelters, also a by-right use, will be provided and disbursed throughout the Property. The Applicant has vast experience and success creating and managing parks throughout Northern Virginia and will use that knowledge to ensure uses are located appropriately throughout the site to ensure compatibility and ease of use.*

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Issue Status: Unresolved. The Applicant must demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the standards of Section 4-1507 and Section 6-1101(A) of the Revised 1993 Zoning Ordinance will be satisfied.

Staff understands the Applicant's permitted by-rights uses (e.g., restrooms and picnic shelters); however, they are shown as a part of the application, and Staff notes that they will have an impact on the environment.

12. Please provide more information of the proposed boat launch and rentals. While a boat launch/ramp is permitted by Special Exception, the Revised General Plan, Chapter 5, River and Stream Valley Corridor Policy 18.i, states that in order to "support or enhance the biological integrity and health of the river and stream corridor... Active recreation on the rivers and streams only – including swimming and boating (non-powered) (where specified public points of entry have been identified)."

Applicant Response: *The Applicant anticipates 20 weekend boat launches and two weekday boat launches, the majority of which will be canoes or kayaks. These estimates are based on the usage trends at Algonkian Regional Park in eastern Loudoun, which experiences an estimated seven launches a day. The launches expected at White's Ford are below those seen at Algonkian because the proposed park is in a less populated area. The majority of boat launches from the Applicant's similar parks are by non-motorized vessels, (60% at both Algonkian and Fountainhead Regional Park in Fairfax) although some fishermen do launch their flat-bottomed boats from the parks.*

Issue Status: Unresolved. The Applicant must demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the standards of Special Exception Checklist Items 6b and 11 and Section 4-1507 of the Revised 1993 Zoning Ordinance will be satisfied.

Staff requests additional information on the size and materials of proposed boat ramp. While Staff notes that the State of Maryland wholly incorporates the Potomac River and the land beneath it, "Virginia has a proprietary right on the south shore to low water-mark, and, appurtenant thereto, has a privilege to erect any structures connected with the shore which may be necessary to the full enjoyment of her riparian ownership, and which shall not impede the free navigation or other common use of the river as a public highway" per the Black-Jenkins Award of 1877, which upheld the original Compact of 1785, defining the boundary between Maryland and Virginia. Staff recommends that the Applicant coordinate

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with the Potomac River Fisheries Commission and the Interstate Commission on the Potomac River Basin on the design and construction of the boat ramp to avoid any potential boat ramp disputes.

Furthermore, Staff recommends that as a Condition of Approval, the Applicant restrict the launching of watercraft to non-powered boats, per the aforementioned Revised General Plan policies. While the Applicant permits all types of watercraft to launch from Algonkian Regional Park, the Potomac River is much wider and deeper in that area. The shallow nature of the river adjacent to the site would preclude most powered watercraft. Non-powered watercraft is also better suited with the rural and scenic nature of the park that the Applicant is proposing.

13. Please provide the proposed number and type (individual vs. group) of campsites within the park.

Applicant Response: The Applicant is applying for a Level II campground, which permits between 50 and 100 campsites, independent of whether they are for individuals or groups. Currently, the Applicant envisions approximately 60 individual campsites, 10 cabins and several group camping areas, although these numbers may change before site plan. Regardless of the mix of facilities, the number of campsites will not exceed 100.

Issue Status: Unresolved. In the Applicant's response to Comment 12, approximately 100 family campsites is stated, while the response to Comment 14 states 60 individual campsites. Please revise or explain this discrepancy.

In addition, the Applicant's TIA states that "*no Recreational Vehicles or 5th-wheel trailers will be allowed in the park.*" However, in response to the OTS Comment #8 (dated April 13, 2009) which supported this restriction, the Applicant states that they do not intend to restrict RVs and trailers less than 25' in length. There is no reference to RV and/or trailer camping in the Statement of Justification or identified on the SPEX Plat or Concept Sketch.

Due to the rural and precarious conditions of Hibler Road and the Applicant's unwillingness to improve it, Staff supports the recommendation from OTS to restrict RVs and 5th-wheel trailers from the park for patron safety concerns due to the nature of Hibler Road.

Should it be desirable to permit other travel trailers and campers, the Applicant will have to provide more information about the location of these different vehicular camp sites, including electrical and water hookups and gray water facilities.

14. Please provide more information on uses and structures within the proposed Future Equestrian Facility per the colored Concept Sketch. It appears that a large portion of it is located within an identified archeological resource area.

Applicant Response: *The equestrian facility, which is a by-right permitted use, is not part of this application. It is only shown in concept at this point, with details to be worked out at a later date.*

Issue Status: **Unresolved.** The Applicant must demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the requirements of Section 6-1101(A) of the Revised 1993 Zoning Ordinance will be satisfied.

Staff understands the Applicant's permitted by-rights uses; however, the equestrian facility is shown as a part of the application, and Staff notes that it will have an impact on the environment and traffic conditions along Hibler Road.

15. Please provide more information on the proposed Event Areas (e.g., types of events, proposed temporary structures, parking requirements) per the colored Concept Sketch.

Applicant Response: *The event area is not part of this application and has been removed from the Concept Sketch.*

Issue Status: **Resolved.**

16. Please provide more information on the proposed Colonel White House Interpretive Area per the colored Concept Sketch.

Applicant Response: *The Colonel White House and any related interpretive features are not part of this application.*

Issue Status: The Applicant must demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the requirements of Section 6-1101(A) of the Revised 1993 Zoning Ordinance will be satisfied.

17. In conjunction with Comment 16, please provide a detail of the existing homestead area (proposed Colonel White House Interpretive Area), including all of the structures listed in the chart on Sheet 2 of the SPEX Plat, and how they relate to the proposed uses; currently Sheet 2 is difficult to read. In addition, please provide Plat Labels as to whether or not the existing structures are to remain or be removed.

Applicant Response: Although the Colonel White House and any associated structures are not part of this application, the Concept Sketch has been revised to label these structures. As stated in the application, the house will be maintained. Additional existing structures may be maintained and reused as part of the park's facilities.

Issue Status: Unresolved. The response states that the Concept Sketch has been revised with labels and the Concept Sketch references "See Chart" which cannot be located on the Sketch or SPEX Plat. Please revise or explain this discrepancy.

Furthermore, Staff requests more information on the current condition of the house, and what the immediate plans for it may be, regardless of whether it is currently a part of the application. Is the house currently lived in? Will it be maintained as a residence within the park? Will it be "mothballed" until the Applicant has the planning and funding for future interpretive use?

18. Please demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the proposed parking will meet Section 5-100 of the Revised 1993 Zoning Ordinance per Special Exception Checklist Item K6b.

Applicant Response: Because so much of the plan is still conceptual, the Applicant requested and received a waiver from submitting a parking analysis. At time of site plan, the Applicant will provide parking in accordance with Zoning Ordinance requirements.

Issue Status: Unresolved. Please provide a copy of the parking analysis waiver.

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19. Staff requests more information on the proposed Primary and Secondary Roads and parking/loading areas throughout the park (e.g., travel lane widths, pavement materials, number of parking spaces etc.) per Special Exception Checklist Items K10b and 11. It appears on Sheet 4 that the proposed parking area for the boat launch may be undersized to accommodate multiple boat trailers. Please also provide more information on where would overflow parking be located.

Applicant Response: Because so much of the plan is still conceptual, the Applicant has not designed the parking areas or roads specified above. At time of site plan, the Applicant will provide parking in accordance with Zoning Ordinance requirements and ensure that the roads and parking are sufficient for the anticipated users. In addition, the Applicant will work with VDOT to ensure that the entrance to the Property is sufficient.

Issue Status: Unresolved. The Applicant must demonstrate to Staff, the Planning Commission, and the Board of Supervisors how Special Exception Checklist Items K10b and 11 will be satisfied.

Unless the Applicant has received a waiver for these items, the Checklist is incomplete. While Staff understands that a Special Exception may be conceptual in nature, it is difficult to appropriately analyze the plan as proposed and how it will meet the ultimate engineering standards required by the Special Exception uses.

20. Staff notes that for the previous land development application SBPL 2006-0084, the property owner drilled and located multiple test wells and drain fields for residential use. Staff requests more information on which wells and drain fields will serve the proposed facilities and if they are adequate for the proposed commercial uses.

Applicant Response: It is premature to identify what wells or drain fields will serve the proposed facilities since the exact location of those facilities have not been determined. In terms of these facilities, the Applicant will meet health department requirements at time of site plan.

Issue Status: Unresolved. The Applicant must demonstrate to Staff, the Planning Commission, and the Board of Supervisors how Special Exception Checklist Item 9 will be satisfied.

21. Staff requests more information concerning the proposed residential "outlot" straddling Hibler Road surrounded by the proposed park.

Applicant Response: *This outparcel is not part of the application.*

Issue Status: Unresolved. The Applicant must demonstrate to Staff, the Planning Commission, and the Board of Supervisors how Special Exception Checklist Items 8a and 8b will be satisfied.

22. Staff requests more information about the Virginia Outdoors Foundation (VOF) easements on the property, including the associated recorded deeds, descriptions, and resources that the "No-Build" areas are protecting.

Applicant Response: *The Applicant has consulted with VOF as it has planned its park facilities and received a preliminary determination from VOF that the proposed park uses are compatible with the easement restrictions as no facilities are planned for any of the No-Build zones established by VOF. The No-Build Zones north of Hibler Road are on the high points of the land and protect the scenic values of the Property, while the No-Build zones south of Hibler Road protect archeological resources. NVRPA will continue to coordinate its plans with VOF and will obtain any approvals from VOF necessary for compliance with the easement.*

Issue Status: Resolved.

23. The colored Concept Sketch graphically delineates hiking/equestrian trails and Sheets 3 and 4 of the Special Exception Plat do not. Please revise and/or explain this discrepancy.

Applicant Response: *There is no discrepancy. The Special Exception Plat only lists those uses for which a special exception is needed. The majority of the proposed uses are permitted by right, so they are left off of the Special Exception Plat. The Concept Sketch, on the other hand, includes both by-right and special exception uses that are planned for the park.*

Issue Status: Resolved.

24. PRCS has been directed by the Board of Supervisors to act as the lead agency for the design and implementation of the Potomac Heritage National Scenic Trail (PHNST) in Loudoun County. PRCS requests the opportunity to work with the Applicant in establishment of a section of the PHNST on the subject property, per the Revised General Plan, Chapter 5, Scenic Rivers and Potomac River

Policy 10. Furthermore, Sheets 3 and 4 of the Special Exception Plat should be revised to graphically delineate and label a proposed alignment for the PHNST.

Applicant Response: The Applicant is a partner in creating this trail and will preserve the ability to extend this trail through the Property. However, until easements are acquired for the adjacent sections of the trail, it is impossible to determine the exact location and dimension of the trail through the Property, and therefore inappropriate to depict any such alignment.

Issue Status: Unresolved. The Applicant must demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the requirements of Section 6-1101(A) of the Revised 1993 Zoning Ordinance will be satisfied.

The purpose and intent of the PHNST is to provide access to the Potomac River for recreational and scenic enjoyment. In Loudoun County, the trail is primarily a rustic hiking trail in most places. The comment response is irrelevant to the purpose of the PHNST, and while trail are permitted by-right use, a commitment to the PHNST should be made in a label for the proposed trail along the Potomac River on the Concept Sketch, at a minimum. Staff recommends that as a Condition of Approval, the Applicant commit to the establishment of their portion of the PHNST. This may be accomplished as part of the loop trail the Applicant has proposed, to be continued offsite at a future date.

NEW COMMENTS (August 20, 2009):

25. Please submit draft Conditions of Approval for Staff review.
26. Staff recommends removing the colored Concept Sketch from the application, or recommends including it in the SPEX Plat as an illustrative for purposes of satisfying Commission Permit requirements under Section 6-1101(A) of the Revised 1993 Zoning Ordinance.

CONCLUSION:

PRCS still has multiple outstanding issues that require additional information to complete the review of this application.

If you have any questions or concerns regarding these comments, please do not hesitate to contact me personally via phone at 571-258-3251, or via e-mail at brian.fuller@loudoun.gov. You may also contact Mark Novak via phone at 703-737-8992, or via e-mail at mark.novak@loudoun.gov. I look forward to attending any meetings or work sessions to offer PRCS support, or to be notified of any further information regarding this project.



**COUNTY OF LOUDOUN
PARKS, RECREATION AND COMMUNITY SERVICES
REFERRAL MEMORANDUM**

To: Nicole Steele, Project Manager, Planning Department (MSC #62)
From: *NSA* Brian G. Fuller, Park Planner, Facilities Planning and Development (MSC #78)
Through: *ND* Mark A. Novak, Chief Park Planner, Facilities Planning and Development
CC: Diane Ryburn, Director

Steve Torpy, Assistant Director

Su Webb, PROS Board, Chairman, Catoclin District

Robert C. Wright, PROS Board, Open Space Member

James E. O'Conner, PROS Board, Open Space Member



Date: March 25, 2009

Subject: **White's Ford Park**
SPEX 2008-0061, SPEX 2008-0062, and CMPT 2008-0020

Election District: Catoclin **Sub Planning Area:** Route 15 North

MCPI #: 077-36-5320

BACKGROUND AND ANALYSIS:

The Northern Virginia Regional Park Authority (Applicant) is seeking a Special Exception to allow a boat ramp and/or pier to provide water access to the Potomac River; a Minor Special Exception to allow a campground with overnight stays in tents, cabins or other types of shelters; and a Commission Permit to allow a regional park. Proposed uses within the park include public hiking trails, camping and cabin facilities, a boat ramp, picnic pavilions, playgrounds, event areas, interpretation of the historic home, and a future equestrian facility.

The Property is currently approximately 294.6 acres, located at the end of the state-maintained portion of Hibler Road (Route 656), east of Route 15, north of Leesburg along the Potomac River. The Property is located within the AR-1 Zoning District, and portions of the property are subject to a conservation easement held by the Virginia Outdoors Foundation (VOF). The current owner of the Property (QDP, LLC) has filed a subdivision application to retain 20 acres, leaving approximately 275 for the proposed passive park. The Property was recently subject to a Preliminary Subdivision Plat, Gianna Terra (SBPL 2006-0084), approved on July 10, 2007.

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POLICY:

The site is governed under the land use policies in the Revised General Plan, the Revised 1993 Zoning Ordinance, the Revised Countywide Transportation Plan (CTP), and the Loudoun County Bicycle and Pedestrian Mobility Master Plan (BPMMP). The subject site is located within the Rural-20 Policy Area. The Planned Land Use Map adopted with the Revised General Plan identifies the subject site as planned for Rural 20 (low-density housing).

COMMENTS:

With respect to Parks, Recreation and Community Services (PRCS) we offer the following comments and recommendations:

1. Staff notes that the Applicant is proposing in their Statement of Justification to retain Hibler Road (Route 656) as a rural, gravel road. However, Staff is familiar with the existing conditions of the current road, and notes that the road is essentially one-lane wide in most places, and may not be able to adequately accommodate the potential traffic to and from a Regional Park. Furthermore, direct access to Hibler Road from Route 15 south of the subject property is served by Limestone School Road (Route 661). Limestone School Road crosses a fork of Limestone Branch over a one-lane bridge, which may not be able to adequately handle the volume of traffic to a Regional Park. In addition, since the subject property is located at the end of the state-maintained portion of Hibler Road, there is not a secondary point of access to relieve potential traffic. Given the desire and demand for public equestrian facilities, campgrounds and boat ramps on the Potomac River in Loudoun County, the Applicant may be underestimating the potential popularity of such facilities and the traffic impacts they may have on these rural roads.

Staff has reviewed the provided Traffic Study, and notes that the main studied intersection (Route 15 and Limestone School Road) currently operates at Level F for westbound traffic and will continue to do so throughout the build-out of the proposed park. However, no traffic mitigation measures are warranted or recommended. The Traffic Study adequately calculated current levels and future growth at the Route 15 and Limestone School Road, but did not take into account or make any recommendation on the existing condition of Hibler Road.

While PRCS supports the Applicant's intentions to preserve the rural quality and character of Hibler Road per the Revised General Plan, the Plan did not originally intend for a Regional Park to be located at the end of Hibler Road. The area around Hibler Road is very agricultural in nature and farm equipment frequently crosses and/or utilizes the roadway. The current road is narrow and

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contains several blind turns and dips that may be hazardous to park patrons, especially those pulling boat trailers to the proposed boat ramp on the river. Staff recommends that the Applicant consider improvements along Hibler Road to include widening the travel lanes and improving the shoulders and ditches along the road. The Applicant should consult directly with the Office of Transportation Services (OTS) and the Virginia Department of Transportation (VDOT) to better define what improvements are necessary.

Furthermore, Staff notes that Hibler Road (Route 656) serves up to eight (8) existing private residential lots and one (1) proposed residential lot beyond the subject property. Please provide more information on how the Applicant is proposing to accommodate through-traffic on Hibler Road within the park.

2. Staff has reviewed the provided Archeological Investigations on the subject property. The property lies within the Catoctin Rural Historic District. The Phase I study for the northern +/-150 acres identifies three (3) sites that are considered to be potentially eligible for inclusion on the National Register of Historic Places, and avoidance of these sites or Phase II evaluations are recommended. Furthermore, an intensive architectural survey is recommended for the historic farm complex (including the Colonel White House). The Phase IA study for the southern +/-131 acres identified two (2) previously recorded sites and one new site, which was recommended for a full Phase I investigation.

Staff notes that on the colored Concept Sketch, the Applicant is proposing to develop "Individual/Family Campsites and Youth Group Camping" within Site 44LD-A and the revised Probable Location of Site 44LD0365. These areas include a high number of artifact locations (Phase IA Exhibit 16), are noted to have a high archeology probability (Phase IA Exhibit 19) and are recommended for avoidance and/or controlled surface collection (Phase IA Exhibit 20). PRCS recommends revising the proposed location of these campsites to avoid any impact or disturbance to these areas, as they may be significant in nature and may include human burials.

In addition, the Applicant is proposing a "Colonel White House Interpretive Area" within Site 44LD1364 / VDHR 050-0012-0082. Staff requests more information on the proposed uses within the proposed interpretive area, and recommends that the Applicant coordinate any development in the area with the Virginia Department of Historic Resources, as the house and its ancillary structures are considered to be a contributing architectural resource to the Catoctin Rural Historic District.

PRCS requests that the aforementioned recommended Phase I and Phase II investigations be completed as a Special Exception Condition of Approval prior to Site Plan (STPL) approval. Furthermore, PRCS recommends that the

Applicant apply for applicable listings on the National Register of Historic Places for the Colonel White House farmstead.

3. In addition to Comment 2, Staff notes that there are two separate Plat Notes (#7 and #18) on Sheet 1 discussing different identified Archeological Resources. Please revise or explain this discrepancy.
4. Staff has reviewed the provided Wetlands Delineation Report on the subject property. The report states that there are several locations where areas of palustrine emergent wetlands and stream channels have been significantly disturbed by previous and current cattle operations on the subject property. PRCS recommends that the Applicant consult with the United States Army Corps of Engineers (USACE) and the Loudoun County Environmental Review Team (ERT) on methods for restoring and enhancing these critical environmental resources and habitats. Specific restoration methods should be included as a Special Exception Condition of Approval prior to Site Plan (STPL) approval.
5. The Special Exception Plat shows potential impact to wetlands and stream corridors throughout the proposed park, specifically along the proposed location of Primary Park Road in the northern half of the subject property. The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the potential impact to wetlands and stream corridors will be mitigated.
6. The Special Exception Plat shows potential impact to moderately steep slopes throughout the proposed park, specifically along the proposed location of Primary Park Road in the northern half of the subject property. The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the potential impact to moderately steep slopes will be mitigated.
7. The Special Exception Plat shows potential impact to minor floodplain throughout the proposed park, specifically along the proposed location of Primary Park Road in the northern half of the subject property. The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the potential impact to minor floodplain will be mitigated.
8. Staff notes that per the colored Concept Sketch, campsite areas, restrooms/showers and picnic pavilions are located within the Potomac River major floodplain. Typically, structures such as restroom/shower facilities and picnic pavilions are not permitted within a major floodplain. In addition, please provide more information on what type of amenities are proposed within each campsite (e.g., tent pads, picnic tables, lantern posts, water spigots, etc.).

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9. Please provide a Phasing Plan for the proposed development of the park. Staff notes that phasing appears to be proposed in the Traffic Study, but not clearly discussed on the Plat or within the Statement of Justification.
10. Staff notes that a land development application for the subject property, Gianna Terra (SBPL 2006-0084) was approved on July 10, 2007. Please revise the Preliminary Soils Review (PSR) note on Sheets 1 and 2 to include the previous land development application number for which the PSR was submitted.
11. Staff requests more information concerning the proposed "passive" uses within the park. Please provide additional details and/or illustrative drawings to better describe the proposed camping cabins/yurts, picnic pavilions, restrooms/showers and the "incidental seasonal" (temporary) concession/boat rental facility per Special Exception Checklist Item K6a.
12. Please provide more information of the proposed boat launch and rentals. While a boat launch/ramp is permitted by Special Exception, the Revised General Plan, Chapter 5, River and Stream Valley Corridor Policy 18.i, states that in order to *"support or enhance the biological integrity and health of the river and stream corridor... Active recreation on the rivers and streams only – including swimming and boating (non-powered) (where specified public points of entry have been identified)."*
13. Please provide the proposed number and type (individual vs. group) of campsites within the park.
14. Please provide more information on uses and structures within the proposed Future Equestrian Facility per the colored Concept Sketch. It appears that a large portion of it is located within an identified archeological resource area.
15. Please provide more information on the proposed Event Areas (e.g., types of events, proposed temporary structures, parking requirements) per the colored Concept Sketch.
16. Please provide more information on the proposed Colonel White House Interpretive Area per the colored Concept Sketch.
17. In conjunction with Comment 16, please provide a detail of the existing homestead area (proposed Colonel White House Interpretive Area), including all of the structures listed in the chart on Sheet 2 of the SPEX Plat, and how they relate to the proposed uses; currently Sheet 2 is difficult to read. In addition, please provide Plat Labels as to whether or not the existing structures are to remain or be removed.

18. Please demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the proposed parking will meet Section 5-100 of the Revised 1993 Zoning Ordinance per Special Exception Checklist Item K6b.
19. Staff requests more information on the proposed Primary and Secondary Roads and parking/loading areas throughout the park (e.g., travel lane widths, pavement materials, number of parking spaces etc.) per Special Exception Checklist Items K10b and 11. It appears on Sheet 4 that the proposed parking area for the boat launch may be undersized to accommodate multiple boat trailers. Please also provide more information on where would overflow parking be located.
20. Staff notes that for the previous land development application SBPL 2006-0084, the property owner drilled and located multiple test wells and drain fields for residential use. Staff requests more information on which wells and drain fields will serve the proposed facilities and if they are adequate for the proposed commercial uses.
21. Staff requests more information concerning the proposed residential "outlot" straddling Hibler Road surrounded by the proposed park.
22. Staff requests more information about the Virginia Outdoors Foundation (VOF) easements on the property, including the associated recorded deeds, descriptions, and resources that the "No-Build" areas are protecting.
23. The colored Concept Sketch graphically delineates hiking/equestrian trails and Sheets 3 and 4 of the Special Exception Plat do not. Please revise and/or explain this discrepancy.
24. PRCS has been directed by the Board of Supervisors to act as the lead agency for the design and implementation of the Potomac Heritage National Scenic Trail (PHNST) in Loudoun County. PRCS requests the opportunity to work with the Applicant in establishment of a section of the PHNST on the subject property, per the Revised General Plan, Chapter 5, Scenic Rivers and Potomac River Policy 10. Furthermore, Sheets 3 and 4 of the Special Exception Plat should be revised to graphically delineate and label a proposed alignment for the PHNST.

CONCLUSION:

PRCS is enthusiastic about the Applicant's opportunity to provide additional public recreation facilities to the citizens of Loudoun County along the Potomac River. However, PRCS has identified above, outstanding issues that require additional information to complete the review of this application.

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If you have any questions or concerns regarding these comments, please do not hesitate to contact me personally via phone at 571-258-3251, or via e-mail at brian.fuller@loudoun.gov. You may also contact Mark Novak via phone at 703-737-8992, or via e-mail at mark.novak@loudoun.gov. I look forward to attending any meetings or work sessions to offer PRCS support, or to be notified of any further information regarding this project.

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Important! The adopted Affidavit and Reaffirmation of Affidavit forms shall not be altered or modified in any way. Any form that is altered or modified in any way will not be accepted.

REAFFIRMATION OF AFFIDAVIT

In reference to the Affidavit dated November 6, 2009
(enter date of affidavit)

For the Application White's Ford Park, with Number(s) SPEX 2008-0061, SPEX 2008-0062,
CMPT 2008-0020
[enter Application name(s)] [enter Application number(s)]

I, Molly M. Novotny, do hereby state that I am an

- (check one) Applicant (must be listed in Paragraph C of the above-described affidavit)
- Applicant's Authorized Agent (must be listed in Paragraph C of the above-described affidavit)

And that to the best of my knowledge and belief, the following information is true:

(check one) I have reviewed the above-described affidavit, and the information contained therein is true and complete as of _____, or;
(today's date)

I have reviewed the above-described affidavit, and I am submitting a new affidavit which includes changes, deletions or supplemental information to those paragraphs of the above-described affidavit indicated below:

- (Check if applicable)
- Paragraph C-1
 - Paragraph C-2
 - Paragraph C-3
 - Paragraph C-4(a)
 - Paragraph C-4(b)
 - Paragraph C-4(c)



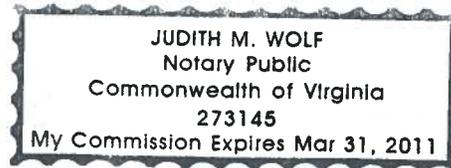
WITNESS the following signature:

Molly M. Novotny
check one: Applicant or Applicant's Authorized Agent
Molly M. Novotny, Senior Urban Planner
(Type or print first name, middle initial and last name and title of signee)

Subscribed and sworn before me this 16th day of February, 2010, in the State/Commonwealth of Virginia, in the County/City of Fairfax.

Judith M. Wolf
Notary Public

My Commission Expires: 3/31/2011
Notary Registration Number: 273145



I, Molly M. Novotny, do hereby state that I am an

Applicant

Applicant's Authorized Agent listed in Section C.1. below

in Application Number(s): SPEX 2008-0061, SPEX 2008-0062 and CMPT 2008-0020

and that to the best of my knowledge and belief, the following information is true:

C. DISCLOSURES: REAL PARTIES IN INTEREST AND LAND USE PROCEEDINGS

1. REAL PARTIES IN INTEREST

The following constitutes a listing of the names and addresses of all **APPLICANTS, TITLE OWNERS, CONTRACT PURCHASERS** and **LESSEES** of the land described in the application* and if any of the forgoing is a **TRUSTEE**** each **BENEFICIARY** of such trust, and all **ATTORNEYS**, and **REAL ESTATE BROKERS**, and all AGENTS of any of the foregoing.

All relationships to the persons or entities listed above in **BOLD** print must be disclosed. Multiple relationships may be listed together (ex. Attorney/Agent, Contract Purchaser/Lessee, Applicant/Title Owner, etc.) For a multiple parcel application, list the Parcel Identification Number (PIN) of the parcel(s) for each owner(s).

<i>PIN</i>	<i>NAME (First, M.I., Last)</i>	<i>ADDRESS (Street, City, State, Zip Code)</i>	<i>RELATIONSHIP (Listed in bold above)</i>
	Northern Virginia Regional Park Authority - Thaddeus E. Hafner - Katherine H. Rudacille - Paul E. McCray - Christopher W. Pauley - Paul A. Gilbert - Joan G. Rokus - Su A. Webb - James I. Mayer (former)	5400 Ox Road Fairfax Station, VA 22039	Applicant
	christopher consultants, ltd. - Giovanni B. "John" Rinaldi - Brian G. Nolan (former) - Louis (nmi) Canonico - Christopher D. Glassmoyer (former) - Charlene (nmi) Parker	9900 Main Street, 4 th Floor Fairfax, VA 22031	Civil Engineer/Agents

* In the case of a condominium, the title owner, contract purchaser, or lessee of 10% or more of the units in the condominium.

** In the case of a TRUSTEE, list Name of Trustee, name of Trust, if applicable, and name of each beneficiary.

Check if applicable:

There are additional Real Parties in Interest. See Attachment to Paragraph C-1.

I, Molly M. Novotny, do hereby state that I am an
 ___ Applicant

X Applicant's Authorized Agent listed in Section C.1. below

in Application Number(s): SPEX 2008-0061, SPEX 2008-0062 and CMPT 2008-0020
 and that to the best of my knowledge and belief, the following information is true:

C. DISCLOSURES: REAL PARTIES IN INTEREST AND LAND USE PROCEEDINGS

1. REAL PARTIES IN INTEREST

The following constitutes a listing of the names and addresses of all **APPLICANTS, TITLE OWNERS, CONTRACT PURCHASERS** and **LESSEES** of the land described in the application* and if any of the forgoing is a **TRUSTEE**** each **BENEFICIARY** of such trust, and all **ATTORNEYS**, and **REAL ESTATE BROKERS**, and all AGENTS of any of the foregoing.

All relationships to the persons or entities listed above in **BOLD** print must be disclosed. Multiple relationships may be listed together (ex. Attorney/Agent, Contract Purchaser/Lessee, Applicant/Title Owner, etc.) For a multiple parcel application, list the Parcel Identification Number (PIN) of the parcel(s) for each owner(s).

<i>PIN</i>	<i>NAME (First, M.I., Last)</i>	<i>ADDRESS (Street, City, State, Zip Code)</i>	<i>RELATIONSHIP (Listed in bold above)</i>
	Gorove/Slade Associates, Inc. - Christopher M. Tacinelli - Daniel B. VanPelt - Sonya I. Viera (former) - Tushar A. Awar	1140 Connecticut Ave., NW Suite 700 Washington, DC 20036	Traffic Engineer/Agents
077-36-5320	QDP, LLC - William J. Clougherty	3043 Jeannie Anna Court Oak Hill, VA 20171	Owner
	Cooley Godward Kronish LLP -Antonio J. Calabrese -Mark C. Looney -Colleen P. Gillis Snow -Jill D. Switkin -Brian J. Winterhalter -Shane M. Murphy -John P. Custis -Jeffrey A. Nein -Molly M. Novotny -Ben I. Wales	11951 Freedom Drive, Suite 1500 Reston, VA 20190-5656	Attorney/Agents

* In the case of a condominium, the title owner, contract purchaser, or lessee of 10% or more of the units in the condominium.

** In the case of a TRUSTEE, list Name of Trustee, name of Trust, if applicable, and name of each beneficiary.

Check if applicable:

___ There are additional Real Parties in Interest. See Attachment to Paragraph C-1.

2. CORPORATION INFORMATION (see also Instructions, Paragraph B.3 above)

The following constitutes a listing of the **SHAREHOLDERS** of all corporations disclosed in this affidavit who own 10% or more of any class of stock issued by said corporation, and where such corporation has 100 or fewer shareholders, a listing of all of the shareholders, **and if such corporation is an owner of the subject land,** all **OFFICERS** and **DIRECTORS** of such corporation. (Include sole proprietorships, limited liability companies and real estate investment trusts).

Name and Address of Corporation: (complete name, street address, city, state, zip code)

Gorove/Slade Associates, Inc., 1140 Connecticut Ave., NW, Suite 700, Washington, DC 20036

Description of Corporation:

There are 100 or fewer shareholders and all shareholders are listed below.

There are more than 100 shareholders, and all shareholders owning 10% or more of any class of stock issued by said corporation are listed below.

There are more than 100 shareholders but no shareholder owns 10% or more of any class of stock issued by said corporation, and no shareholders are listed below.

There are more than 500 shareholders and stock is traded on a national or local stock exchange.

Names of Shareholders:

<i>SHAREHOLDER NAME (First, M.I., Last)</i>	<i>SHAREHOLDER NAME (First, M.I., Last)</i>
Christopher M. Tacinelli	
Chad A. Baird	
Daniel B. VanPelt	
Erwin N. Andres	

Names of Officers and Directors:

<i>NAME (First, M.I., Last)</i>	<i>Title (e.g. President, Treasurer)</i>
Christopher M. Tacinelli	President
Chad A. Baird	Vice President
Daniel B. VanPelt	Vice President
Erwin N. Andres	Vice President

Check if applicable:

There is additional Corporation Information. See Attachment to Paragraph C-2.

2. CORPORATION INFORMATION (see also Instructions, Paragraph B.3 above)

The following constitutes a listing of the **SHAREHOLDERS** of all corporations disclosed in this affidavit who own 10% or more of any class of stock issued by said corporation, and where such corporation has 100 or fewer shareholders, a listing of all of the shareholders, and if such corporation is an owner of the subject land, all **OFFICERS** and **DIRECTORS** of such corporation. (Include sole proprietorships, limited liability companies and real estate investment trusts).

Name and Address of Corporation: (complete name, street address, city, state, zip code)

Northern Virginia Regional Park Authority, 5400 Ox Road, Fairfax Station, VA 22039

Description of Corporation:

There are 100 or fewer shareholders and all shareholders are listed below.

There are more than 100 shareholders, and all shareholders owning 10% or more of any class of stock issued by said corporation are listed below.

There are more than 100 shareholders but no shareholder owns 10% or more of any class of stock issued by said corporation, and no shareholders are listed below.

There are more than 500 shareholders and stock is traded on a national or local stock exchange.

Names of Shareholders:

<i>SHAREHOLDER NAME (First, M.I., Last)</i>	<i>SHAREHOLDER NAME (First, M.I., Last)</i>
<p>The Northern Virginia Regional Park Authority, established in 1959, is a body politic and corporate formed under the Virginia Park Authorities Act of the Code of Virginia. The Authority is comprised of six participating political subdivisions as follows:</p> <p>City of Alexandria, Arlington County, City of Fairfax, Fairfax County, City of Falls Church, Loudoun County</p> <p>The Authority is governed by a 12-member Board with each participating jurisdiction appointing two members.</p>	

Names of Officers and Directors:

<i>NAME (First, M.I., Last)</i>	<i>Title (e.g. President, Treasurer)</i>
Su A. Webb	Chairman
Brian D. Knapp	Vice Chairman
Barry D. Buschow	Treasurer
Paul (nmi) Ferguson	Board Member
Jean R. Packard	Board Member
Judy (nmi) Braus	Board Member
Jeffrey (nmi) Tarbert	Board Member
Michael A. Nardolilli	Board Member
Arthur F. Little	Board Member
Justin M. Wilson	Board Member
David M. Pritzker	Board Member
Joan G. Rokus	Board Member
James I. Mayer (former)	
William C. Dickinson (former)	

Check if applicable:

There is additional Corporation Information. See Attachment to Paragraph C-2.

2. CORPORATION INFORMATION (see also Instructions, Paragraph B.3 above)

The following constitutes a listing of the **SHAREHOLDERS** of all corporations disclosed in this affidavit who own 10% or more of any class of stock issued by said corporation, and where such corporation has 100 or fewer shareholders, a listing of all of the shareholders, **and if such corporation is an owner of the subject land**, all **OFFICERS** and **DIRECTORS** of such corporation. (Include sole proprietorships, limited liability companies and real estate investment trusts).

Name and Address of Corporation: (complete name, street address, city, state, zip code)

christopher consultants, ltd., 9900 Main Street, 4th Floor, Fairfax, VA 22031

Description of Corporation:

There are 100 or fewer shareholders and all shareholders are listed below.

There are more than 100 shareholders, and all shareholders owning 10% or more of any class of stock issued by said corporation are listed below.

There are more than 100 shareholders but no shareholder owns 10% or more of any class of stock issued by said corporation, and no shareholders are listed below.

There are more than 500 shareholders and stock is traded on a national or local stock exchange.

Names of Shareholders:

<i>SHAREHOLDER NAME (First, M.I., Last)</i>	<i>SHAREHOLDER NAME (First, M.I., Last)</i>
Christopher W. Brown	
William R. Goldsmith, Jr.	
Louis (nmi) Canonico	
William R. Zink	
Ruth R. Fields	

Names of Officers and Directors:

<i>NAME (First, M.I., Last)</i>	<i>Title (e.g. President, Treasurer)</i>
Christopher W. Brown	President
William R. Goldsmith, Jr.	Exec. V.P./Secretary
Louis (nmi) Canonico	Vice President
William R. Zink	Vice President
Ruth R. Fields	Treasurer

Check if applicable:

There is additional Corporation Information. See Attachment to Paragraph C-2.

2. CORPORATION INFORMATION (see also Instructions, Paragraph B.3 above)

The following constitutes a listing of the **SHAREHOLDERS** of all corporations disclosed in this affidavit who own 10% or more of any class of stock issued by said corporation, and where such corporation has 100 or fewer shareholders, a listing of all of the shareholders, and if such corporation is an owner of the subject land, all **OFFICERS** and **DIRECTORS** of such corporation. (Include sole proprietorships, limited liability companies and real estate investment trusts).

Name and Address of Corporation: (complete name, street address, city, state, zip code)

QDP, LLC, 3043 Jeannie Anna Court, Oak Hill, VA 20171

Description of Corporation:

There are 100 or fewer shareholders and all shareholders are listed below.

There are more than 100 shareholders, and all shareholders owning 10% or more of any class of stock issued by said corporation are listed below.

There are more than 100 shareholders but no shareholder owns 10% or more of any class of stock issued by said corporation, and no shareholders are listed below.

There are more than 500 shareholders and stock is traded on a national or local stock exchange.

Names of Shareholders:

<i>SHAREHOLDER NAME (First, M.I., Last)</i>	<i>SHAREHOLDER NAME (First, M.I., Last)</i>
Barbara M. Clougherty	
William J. Clougherty	
Michael A. Magnotti	
Robert H. Schwarzmann	
Lawrence E. Tucker	
Stephen M. Turner	

Names of Officers and Directors:

<i>NAME (First, M.I., Last)</i>	<i>Title (e.g. President, Treasurer)</i>
William J. Clougherty	Managing Member

Check if applicable:

There is additional Corporation Information. See Attachment to Paragraph C-2.

3. PARTNERSHIP INFORMATION

The following constitutes a listing of all of the **PARTNERS**, both **GENERAL** and **LIMITED**, in any partnership disclosed in the affidavit.

Partnership name and address: (complete name, street address, city, state, zip)

Cooley Godward Kronish LLP, 11951 Freedom Drive, Suite 1500, Reston, VA 20190

X (check if applicable) The above-listed partnership has no limited partners.

Names and titles of the Partners:

<i>NAME</i> <i>(First, M.I., Last)</i>	<i>Title</i> <i>(e.g. General Partner, Limited Partner, etc)</i>
Jane K. Adams	Partner
Gian-Michele a Marca	Partner
Maureen P. Alger	Partner
Gordon C. Atkinson	Partner
Michael A. Attanasio	Partner
Jonathan P. Bach	Partner
Celia Goldwag Barenholtz	Partner
Frederick D. Baron	Partner
James A. Beldner	Partner

Check if applicable:

X Additional Partnership information attached. See Attachment to Paragraph C-3.

NAME (First, M.I., Last)	Title (e.g. General Partner, Limited Partner, etc)	NAME (First, M.I., Last)	Title (e.g. General Partner, Limited Partner, etc)
Keith J. Berets	Partner	Lester J. Fagen	Partner
Laura A. Berezin	Partner	Brent D. Fassett	Partner
Russell S. Berman	Partner	David J. Fischer	Partner
Laura Grossfield Birger	Partner	M. Wainwright Fishburn, Jr.	Partner
Barbara L. Borden	Partner	M. Manuel Fishman (former)	Partner
Jodie M. Bourdet	Partner	Keith A. Flaum (former)	Partner
Wendy J. Brenner	Partner	Grant P. Fondo (former)	Partner
Matthew J. Brigham	Partner	Daniel W. Frank	Partner
Robert J. Brigham	Partner	Richard H. Frank	Partner
John P. Brockland (former)	Partner	William S. Freeman	Partner
James P. Brogan	Partner	Steven L. Friedlander	Partner
Nicole C. Brookshire	Partner	Thomas J. Friel, Jr.	Partner
Alfred L. Browne, III	Partner	Koji F. Fukumura	Partner
Matthew D. Brown	Partner	James F. Fulton, Jr.	Partner
Matthew T. Browne	Partner	Philip J. Gall (former)	Partner
Robert T. Cahill	Partner	William S. Galliani	Partner
Antonio J. Calabrese	Partner	Stephen D. Gardner	Partner
Linda F. Callison	Partner	John M. Geschke	Partner
Roel C. Campos	Partner	Kathleen A. Goodhart	Partner
William Lesse Castleberry	Partner	Lawrence C. Gottlieb	Partner
Lynda K. Chandler	Partner	Shane L. Goudey	Partner
Dennis (nmi) Childs	Partner	William E. Grauer	Partner
Ethan E. Christensen	Partner	Jonathan G. Graves	Partner
Richard E. Climan (former)	Partner	Kimberley J. Kaplan-Gross	Partner
Samuel S. Coates	Partner	Paul E. Gross	Partner
Alan S. Cohen	Partner	Kenneth L. Guernsey	Partner
Thomas A. Coll	Partner	Patrick P. Gunn	Partner
Joseph W. Conroy	Partner	Zvi (nmi) Hahn	Partner
Jennifer B. Coplan	Partner	John B. Hale	Partner
Carolyn L. Craig	Partner	Andrew (nmi) Hartman	Partner
John W. Crittenden	Partner	Bernard L. Hatcher	Partner
Janet L. Cullum	Partner	Matthew B. Hemington	Partner
Nathan K. Cummings	Partner	Cathy Rae Hershcopf	Partner
John A. Dado	Partner	John (nmi) Hession	Partner
Craig E. Dauchy	Partner	Gordon K. Ho	Partner
Darren K. DeStefano	Partner	Suzanne Sawochka Hooper	Partner
Scott D. Devereaux	Partner	Mark M. Hrenya	Partner
Jennifer Fonner DiNucci	Partner	Christopher R. Hutter	Partner
James J. Donato (former)	Partner	Jay R. Indyke	Partner
Michelle C. Doolin	Partner	Craig D. Jacoby	Partner
John C. Dwyer	Partner	Eric C. Jensen	Partner
Robert L. Eisenbach, III	Partner	Robert L. Jones	Partner

Check if applicable:

X Additional information for Item C-3 is included on an additional copy of page C-3.

NAME (First, M.I., Last)	Title (e.g. General Partner, Limited Partner, etc)	NAME (First, M.I., Last)	Title (e.g. General Partner, Limited Partner, etc)
Barclay J. Kamb	Partner	Timothy J. Moore	Partner
Richard S. Kanowitz	Partner	Webb B. Morrow, III	Partner
Jeffrey S. Karr	Partner	Kevin P. Mullen	Partner
Scott L. Kaufman	Partner	Frederick T. Muto	Partner
Sally A. Kay	Partner	Ryan (nmi) Naftulin	Partner
J. Michael Kelly	Partner	Stephen C. Neal	Partner
Jason L. Kent	Partner	James E. Nesland (former)	Partner
James C. Kitch	Partner	Alison (nmi) Newman	Partner
Michael J. Klisch	Partner	William H. O'Brien	Partner
Michael H. Knight (former)	Partner	Thomas D. O'Connor	Partner
Jason (nmi) Koral	Partner	Vincent P. Pangrazio	Partner
Barbara A. Kosacz	Partner	Timothy G. Patterson	Partner
Kenneth J. Krisko	Partner	Anne H. Peck	Partner
John G. Lavoie	Partner	D. Bradley Peck	Partner
Robin J. Lee	Partner	Susan Cooper Philpot	Partner
Shira Nadich Levin	Partner	Benjamin D. Pierson	Partner
Alan (nmi) Levine	Partner	Frank V. Pietrantonio	Partner
Michael S. Levinson	Partner	Mark B. Pitchford	Partner
Elizabeth L. Lewis	Partner	Michael L. Platt	Partner
Michael R. Lincoln	Partner	Christian E. Plaza	Partner
James C. T. Linfield	Partner	Lori R.E. Ploeger	Partner
David A. Lipkin	Partner	Thomas F. Poche	Partner
Chet F. Lipton	Partner	Anna B. Pope	Partner
Cliff Z. Liu	Partner	Marya A. Postner	Partner
Samuel M. Livermore	Partner	Steve M. Przesmicki	Partner
Douglas P. Lobel	Partner	Seth A. Rafkin	Partner
J. Patrick Loofbourrow	Partner	Frank F. Rahmani	Partner
Mark C. Looney	Partner	Marc (nmi) Recht	Partner
Robert B. Lovett	Partner	Thomas Z. Reicher	Partner
Andrew P. Lustig	Partner	Eric M. Reifschneider (former)	Partner
Michael X. Marinelli	Partner	Michael G. Rhodes	Partner
John T. McKenna	Partner	Michelle S. Rhyu	Partner
Daniel P. Meehan	Partner	Julië M. Robinson	Partner
Beatriz (nmi) Mejia	Partner	Ricardo (nmi) Rodriguez	Partner
Thomas C. Meyers (former)	Partner	Adam C. Rogoff (former)	Partner
Erik B. Milch	Partner	Jane (nmi) Ross (former)	Partner
Robert H. Miller	Partner	Richard S. Rothberg	Partner
Chadwick L. Mills	Partner	Adam J. Ruttenberg	Partner
Brian E. Mitchell	Partner	Adam (nmi) Salassi (former)	Partner
Patrick J. Mitchell	Partner	Thomas R. Salley, III	Partner
Ann M. Mooney	Partner	Richard S. Sanders	Partner
Gary H. Moore (former)	Partner	Glen Y. Sato	Partner

Check if applicable:

Additional information for Item C-3 is included on an additional copy of page C-3.

NAME (First, M.I., Last)	Title (e.g. General Partner, Limited Partner, etc)	NAME (First, M.I., Last)	Title (e.g. General Partner, Limited Partner, etc)
Martin S. Schenker	Partner	John H. Toole	Partner
Joseph A. Scherer	Partner	Robert J. Tosti	Partner
Paul H. Schwartz (former)	Partner	Michael S. Tuscan	Partner
Renee (nmi) Schwartz (former)	Partner	Edward Van Geison	Partner
William J. Schwartz	Partner	Miguel J. Vega	Partner
Brent B. Siler	Partner	Erich E. Veitenheimer, III	Partner
Gregory A. Smith	Partner	Aaron J. Velli	Partner
Whitty (nmi) Somvichian	Partner	Robert R. Vieth	Partner
Mark D. Spoto	Partner	Lois K. Voelz	Partner
Wayne O. Stacy	Partner	Craig A. Waldman (former)	Partner
Neal J. Stephens	Partner	Kent M. Walker	Partner
Donald K. Stern	Partner	David A. Walsh	Partner
Michael D. Stern	Partner	David M. Warren	Partner
Anthony M. Stiegler	Partner	Steven K. Weinberg	Partner
Steven M. Strauss	Partner	Thomas S. Welk	Partner
Myron G. Sugarman	Partner	Christopher A. Westover	Partner
Christopher J. Sundermeier	Partner	Francis R. Wheeler	Partner
Ronald R. Sussman	Partner	Brett D. White	Partner
C. Scott Talbot	Partner	Peter J. Willsey	Partner
Mark P. Tanoury	Partner	Nancy H. Wojtas	Partner
Philip C. Tencer	Partner	Jessica R. Wolff	Partner
Gregory C. Tenhoff	Partner	Nan (nmi) Wu	Partner
Michael E. Tenta	Partner	John F. Young (former)	Partner
Timothy S. Teter	Partner	Kevin J. Zimmer	Partner
ADDITIONS:			
Mazda K. Antia	Partner	Ian (nmi) O'Donnell	Partner
Elias J. Blawie	Partner	Amy E. Paye	Partner
Connie N. Bertram	Partner	John W. Robertson	Partner
Wendy (nmi) Davis	Partner	John H. Sellers	Partner
Renee R. Deming	Partner	Mark B. Weeks	Partner
Eric S. Edwards	Partner	Mark (nmi) Weinstein	Partner
Sonya F. Erickson	Partner	Mark (nmi) Windfield-Hansen	Partner
Alison J. Freeman-Gleason	Partner	Mavis L. Yee	Partner
Jon E. Gavenman	Partner	Christopher C. Campbell	Partner
Jeffrey M. Gutkin	Partner	Babak "Bo" (nmi) Yaghmaie	Partner
Chrystal N. Jensen	Partner	Thomas R. Amis	Partner
Mark L. Johnson	Partner	Christopher J. Austin	Partner
Heidi (nmi) Keefe	Partner	Jeffrey L. Cohen	Partner
Kevin F. Kelly	Partner	Charles S. Kim	Partner
Kristen D. Kercher	Partner	John S. Kyle	Partner
Mark (nmi) Lambert	Partner	Nikesh (nmi) Patel	Partner
Natasha V. Leskovsek	Partner	Audrey K. Scott	Partner
Bonnie Weiss McLeod	Partner	Ian R. Shapiro	Partner
Mark A. Medearis	Partner	Jordan A. Silber	Partner
Keith A. Miller	Partner	Colleen P. Gillis Snow	Partner
		Peter H. Werner	Partner

Check if applicable:

Additional information for Item C-3 is included on an additional copy of page C-3.

4. ADDITIONAL INFORMATION

a. One of the following options **must** be checked:

In addition to the names listed in paragraphs C. 1, 2, and 3 above, the following is a listing of any and all other individuals who own in the aggregate (directly as a shareholder, partner, or beneficiary of a trust) 10% or more of the APPLICANT, TITLE OWNER, CONTRACT PURCHASER, or LESSEE of the land:

Other than the names listed in C. 1, 2 and 3 above, no individual owns in the aggregate (directly as a shareholder, partner, or beneficiary of a trust) 10% or more of the APPLICANT, TITLE OWNER, CONTRACT PURCHASER, or LESSEE of the land:

Check if applicable:

Additional information attached. *See Attachment to Paragraph C-4(a).*

b. That no member of the Loudoun County Board of Supervisors, Planning Commission, Board of Zoning Appeals or any member of his or her immediate household owns or has any financial interest in the subject land either individually, by ownership of stock in a corporation owning such land, or through an interest in a partnership owning such land, or as beneficiary of a trust owning such land.

EXCEPT AS FOLLOWS: (If none, so state). None.

Check if applicable:

Additional information attached. *See Attachment to Paragraph C-4(b).*

c. That within the twelve-month period prior to the public hearing for this application, no member of the Loudoun County Board of Supervisors, Board of Zoning Appeals, or Planning Commission or any member of his immediate household, either individually, or by way of partnership in which any of them is a partner, employee, agent or attorney, or through a partner of any of them, or through a corporation (as defined in the Instructions at Paragraph B.3) in which any of them is an officer, director, employee, agent or attorney or holds 10% or more of the outstanding bonds or shares of stock of a particular class, has or has had any business or financial relationship (other than any ordinary customer or depositor relationship with a retail establishment, public utility, or bank), including receipt of any gift or donation having a value of \$100 or more, singularly or in the aggregate, with or from any of those persons or entities listed above.

EXCEPT AS FOLLOWS: (If none, so state). None.

Check if applicable:

Additional information attached. *See Attachment to Paragraph C-4(c).*

D. COMPLETENESS

That the information contained in this affidavit is complete, that all partnerships, corporations (as defined in Instructions, Paragraph B.3), and trusts owning 10% or more of the APPLICANT, TITLE OWNER, CONTRACT PURCHASER, OR LESSEE of the land have been listed and broken down, and that prior to each hearing on this matter, I will reexamine this affidavit and provide any changed or supplemental information, including any gifts or business or financial relationships of the type described in Section C above, that arise or occur on or after the date of this Application.

WITNESS the following signature:

Molly Novotny
check one: Applicant or Applicant's Authorized Agent

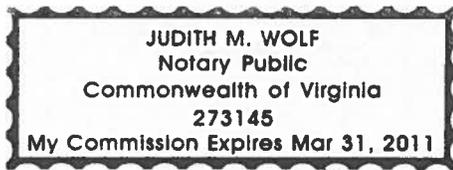
Molly M. Novotny, Senior Urban Planner
(Type or print first name, middle initial and last name and title of signee)

Subscribed and sworn before me this 16th day of February 2010, in the State/Commonwealth of Virginia, in the County/City of Fairfax.

Judith M. Wolf
Notary Public

My Commission Expires: 3/31/2011

385022 v7/RE



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